

Lambeth Local Plan Review

Sustainability Appraisal

Draft Revised Lambeth
Local Plan Proposed
Submission Version

January 2020

December 2019

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December 2008

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NON-TECHNICAL SUMMARY

Sustainability Appraisal

**Draft Revised Lambeth Local Plan
Proposed Submission Version
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1. Introduction

- 1.1 This Non-Technical Summary summarises the findings of the Sustainability Appraisal (SA) of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (DRLLP PSV 2020). An SA promotes sustainable development through the integration of social, environmental and economic considerations into the preparation of new planning documents. It is required by Section 39 of the Planning and Compulsory Purchase Act 2004.
- 1.2 The Non-Technical Summary is part of the Sustainability Report for the DRLLP PSV 2020. The SA report has been produced alongside the DRLLP PSV 2020 to provide guidance on its development. This report presents the key findings to date of the Sustainability Appraisal on the DRLLP PSV 2020 and provides background and relevant additional information.

2 The Revised Lambeth Local Plan Proposed Submission Version

- 2.1 Lambeth Council has reviewed parts of its Local Plan 2015. The existing Local Plan, adopted in 2015, contains a strong vision for the development of the borough to improve opportunities for local people. It sets the planning policies for the borough and much of it is still up-to-date and effective. However, changes to national planning law and policy, a full review of the London Plan and changes in Lambeth mean parts of the Local Plan need to be reviewed.
- 2.2 The DRLLP PSV 2020 sets out the spatial strategy, long term spatial vision, strategic objectives and policies for development, and has a limited sites for development within Lambeth to cover the period up until 2035. It is based on the social, economic and environmental objectives and priorities of the Lambeth Borough Plan 2016-2021, together with other relevant plans, programmes and strategies all of which have implications for the development and land use within the borough.
- 2.3 The borough-wide planning policies are organised by topic: housing, economic development and town centres, social infrastructure, environment, transport and quality of the built environment. Some aspects of policy in these chapters have changed quite fundamentally but in many cases the changes arise from more superficial updating or cross-referencing to the new London Plan. Some of the most significant areas of policy change include:
- Inclusion of the new London Plan borough-level housing target of 1,335 net additional dwellings per annum in Lambeth, with policies to support delivery of this target, including on smaller sites
 - Rewrite to align fully with the Draft London Plan approach to affordable housing, including Fast Track approach (whereby major development proposals that meet London Plan-set thresholds for affordable housing and other Local Plan policy requirements can follow a 'Fast Track Approach' without viability testing at planning application stage) on sites providing between 10 and 25 units; and reinstatement of the requirement for payment in lieu of affordable housing on sites providing between 1 and 9 units, subject to viability
 - A new policy specifically relating to estate regeneration schemes
 - A new policy on build to rent policy
 - Stronger protection for existing office floorspace and clear support for new floorspace to support economic growth in the borough
 - A new policy requiring major office schemes in the north and centre of the borough (including in the proposed new Brixton Creative Enterprise Zone) to provide affordable workspace for smaller creative and digital enterprises

- Reworked transport policies to support delivery of the Lambeth Transport Strategy, including Healthy Streets and a significant modal shift to walking and cycling
- A commitment to apply the emerging new London Plan policy on air quality to development proposals in Lambeth, and a stronger emphasis on urban greening (urban greening factor).

3 The Sustainability Appraisal

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

3.2 Sustainability Appraisals must follow Government guidance on Sustainability Appraisal, and must meet the requirements of the European Strategic Environmental Assessment Directive. A summary of the method used to undertake the SA on the DRLLP PSV 2020 is set out below in Table 1.

Equality Impact Assessment

3.3 It is important that the SA adequately addresses equality and diversity issues. The council has an adopted approach to undertaking Equality Impact Assessments (EqIA) and this SA seeks to integrate the principles of the EqIA across the sustainability objectives. This helps to explore the impact of the proposed policy on different equalities groups, (ie. ethnicity, gender, gender re-assignment, disability, age, sexual orientation, religion or belief, socio-economic factors, marriage and civil partnership, pregnancy and maternity, language, health). For example, whilst SA objective 5 specifically addresses issues of equality and diversity, other objectives also tease out equality impacts via appropriate sub-questions.

Health and Well-being Impact

3.4 As with the EqIA, the Health and Well-being Impact Assessment is integrated into the SA; an approach previously adopted in the SA on the Lambeth Local Plan 2015, which was discussed and agreed with NHS Lambeth. In addition, the Lambeth public health team have had a role in the preparation of the SA by providing current health statistics for the borough and up-to-date guidance and documents on public health. The public health team were also given an opportunity to comment during the preparation of the DRLLP PSV 2020 and advised about evidence for aspects of policy development. The Lambeth Clinical Commissioning Group (CCG) have been engaged in preparation of the Infrastructure Delivery Plan for the Local Plan review.

Table 1: SA process thus far

Date	Actions
SA Stage A: Setting the context and objectives, establishing the baseline and deciding on scope	
March 2016	The draft Scoping Report was made available for comment to the three statutory bodies Natural England, Environment Agency and Historic England over a five-week period from mid-March 2016. The draft Scoping Report provided a summary of the current environmental, social and economic conditions in Lambeth. This baseline information of the Scoping Report assisted in the development of the Sustainability Appraisal Framework (objectives to be used to appraise the DRLLP). Consultation responses were received from all three statutory bodies and their comments incorporated where appropriate.
Stage B: Developing and refining alternatives and assessing their effects; and Stage C: Preparing the Sustainability Appraisal Report	
October 2017	In October 2017 an initial sustainability appraisal was prepared for the Lambeth Local Plan Review Issues and Reasonable Alternatives. The SA assessed each reasonable alternative identified for the local plan issues against the sustainability objectives established through the preparation of the Scoping Report. Consultation was undertaken from October to December 2017 and thirteen representations were received on the SA Issues and Reasonable Alternatives, of which six made comments on the SA.
October 2018	The SA Report October 2018 predicted and evaluated the significant effects of the Draft Revised Lambeth Local Plan October 2018. 98 recommendations were made to address adverse effects and maximise beneficial effects.
December 2019	This SA Report predicts and evaluates the significant effects of the Draft Revised Lambeth Local Plan Proposed Submission Version 2020. It takes into account responses made by the policy team to the 98 recommendations made in the SA on the Draft Revised Lambeth Local Plan October 2018, and representations received on that SA.
Stage D: Consultation on the Draft Revised Lambeth Local Plan October 2018 and SA Report and publication of the Revised Lambeth Local Plan Proposed Submission Version and SA Report	
October – December 2018	The SA Report October 2018 along with the Draft Revised Lambeth Local Plan October 2018 were both available for public consultation for 8 weeks. The feedback received from this consultation has been considered for the Draft Revised Lambeth Local Plan Proposed Submission Version 2020.
31 st January – 13 March 2020	The Revised Lambeth Local Plan Proposed Submission Version 2020 is now available for publication in accordance with Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This SA Report (December 2019) is available as a supporting document to the Draft Revised Lambeth Local Plan Proposed Submission Version 2020.
Stage E: Monitoring the significant effects of implementing the Local Plan	
December 2019	The Sustainability Appraisal on the Revised Lambeth Local Plan Proposed Submission Version 2020 makes recommendations for how significant and uncertain effects of the Revised Lambeth Local Plan should be monitored.

4 Current environmental, social and economic conditions in Lambeth

4.1 The London Borough of Lambeth covers an area of about ten and a half square miles, including Waterloo and the South Bank, Vauxhall, the Oval, Kennington, Stockwell, Clapham, Brixton, Loughborough Junction, Herne Hill, Streatham, Tulse Hill, West Norwood and Gypsy Hill. Located in the southwest of London, Lambeth has approximately 3.2 kilometres of Thames frontage, and is situated on the southern bank of the Thames neighbouring the boroughs of Southwark, Croydon, and Wandsworth and Merton to the east south and west respectively, and Westminster and the City of London to the north across the Thames. Lambeth is an inner London borough with the north of the borough having a mix of central London activities, while the south of the borough is predominately suburban in character.

4.2 Lambeth is an area of contrasts. The northern part of the borough features internationally-significant central London activities centred around Waterloo and the South Bank area, including the South Bank Centre, major corporate offices, the

London Eye and Oval Cricket Ground. Heading south this area gives way to the diverse centres of Brixton and Clapham with their unique blend of entertainment, speciality retail and cultural industries, surrounded by a culturally-diverse residential population. Further south again are the suburbs of Streatham and Norwood which also feature locally important town centres. With no strategic industrial locations in Lambeth, locally significant sites known as Key Industrial Business Areas are protected and these are scattered throughout the borough, currently providing a total area of 48 hectares over 28 KIBAs in the borough. (The DRLLP proposes changes to KIBAs which if approved will result in a total area of 47 hectares over 31 KIBAs.)

- 4.3 The borough has an important historic environment with 62 Conservation Areas covering approximately 30 per cent of the borough including circa 2,500 listed buildings, the vast majority of which are nineteenth-century residential dwellings. There are also 17 Archaeological Priority Zones and eight historic Registered Parks and Gardens as well as protected strategic views in the north of the borough of St Pauls Cathedral and the Palace of Westminster which is a World Heritage site.
- 4.4 Lambeth is a very diverse borough ethnically, culturally, socially and economically and this diversity is constantly evolving. It is the among the most densely populated local authority in England, with over 100 people living in each hectare, more than twice the London population density. Nearly a third of a million people live in Lambeth – at least 318,000. It has a complex social and ethnic mix, with large African and Portuguese populations, and is an important focus for the UK black Caribbean population. The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. Lambeth is the 8th most deprived borough in London and 22nd most deprived in England. This is an improved relative position since 2010 when Lambeth was ranked as the 14th most deprived authority in England. The most deprived places in the borough are mostly in Brixton and Stockwell, with some in Knight's Hill.
- 4.5 Lambeth is an important part of the London economy, which has experienced growth more strongly than the rest of the UK as a whole. The north of Lambeth is an integral part of London's Central Activities Zone (CAZ), home to significant employers and cultural and tourism assets. Further south are a series of important town centres including Brixton, Clapham, Streatham and West Norwood/Tulse Hill. As well as being an important employment location, Lambeth makes a crucial contribution to London's economy as a place where young, highly skilled people live – over 45 per cent of residents are educated to degree level which is comparable with many inner London boroughs (SOB report 2016). The biggest sectors for employment within Lambeth are human health and social work and administrative and support services. Residents are more likely to be in employment than the London average. Unemployment has fallen dramatically in Lambeth since 2010 and is lower than both the London and national rate. There are 11,500 residents who are unemployed; and social housing tenants, BME residents and residents aged over 50 are more likely to be unemployed than other residents (Lambeth Investment and Opportunity Strategy 2015).
- 4.6 Lambeth has a relatively young age profile. Although it is a largely residential borough, it is a destination for young working age people, rather than families. The male and female populations have different age profiles. The young working age population is roughly even between males and females. For all ages over 50, there are slightly more females than males. This reflects national trends.
- 4.7 If trends continue, Lambeth's population is projected to grow by just over 1% per year for the next five years, and just under 1% for the five years after that. The borough

will continue to have a majority of young working age people (20-44). Although the UK population's older population is projected to increase, this will affect Lambeth less than places which are destinations for older people. Lambeth's population aged 60+ is projected to grow by a quarter in the next 10 years, compared to a 10% growth across the whole population. There are substantial differences between ethnic groups. For example, the black Caribbean 60+ population is projected to grow by almost 40%. Similarly, the older black African population, which is currently small, is projected to nearly double. The older white population, which is larger, is projected to grow by about 12%.

- 4.8 Although Lambeth is a largely residential borough with many long term residents, the proportion of people moving in and out of the borough is high, similar to many places in inner London. Approximately 12% of the population leave each year and are replaced by around 12% new arrivals. In other words, around 88% of the population each year remains the same.
- 4.9 The number of households in the borough is projected to grow from 143,655 in 2016 to 172,649 in 2036. Current household composition includes a high proportion of lone parent households with dependent children. One person households, in particular, are projected to increase. Around 67 per cent of households live in rented accommodation (both social and private rented) and 33 per cent own their own home, similar to other inner London boroughs. 17 per cent of households rented from the council in 2016, down from 29 per cent in 2001. The proportion of private renters increased from 18 per cent to 33 per cent during this period.
- 4.10 Around 40% of Lambeth's population is white with a UK background. White people make up 59% of the population. Around 40% of Lambeth residents are White British or Irish, in line with inner London (43%). 15% of the population are from other White backgrounds – around 47,000 people. About two thirds of these people are from Europe outside the UK & Ireland, 8% are from central and south America, 4% from North America and the Caribbean, and 8% from Australasia.
- 4.11 Black people make up around a third of the population (30.4%). Lambeth's largest non-white ethnic group is black African (11.5%), followed by black Caribbean (8.8%). Lambeth has the joint second largest proportion of black Caribbean people in London after Lewisham (10.7%) and Croydon (8.8%) (SOB 2016). Lambeth has a small Asian population compared to many places in London. Only 8.4% of Lambeth residents are from Asian backgrounds (including Chinese), much less than the inner London average (21%). Around 150 different languages are spoken in families in the borough. Around 17,000 people (6% of the population) speak a main language other than English, mostly EU and African languages.
- 4.12 Regional data suggests that around 3.5% of people in London are Lesbian Gay Bisexual and Transgender (LGBT). Recent health estimates suggest that Lambeth has one of the largest populations of gay men in the UK .
- 4.13 Over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest group of residents with a religion.
- 4.14 About 37,000 people in Lambeth have their day-to-day activities limited by a long term illness or disability. About 60% of people with a limiting health condition are aged over 50.
- 4.15 There are an estimated 49,000 people in poverty in Lambeth before housing costs, and 87,000 people in poverty after housing costs. A third of working age people and

a quarter of people of retirement age in Lambeth are living in poverty. However, Lambeth is not one of London's most impoverished boroughs.

4.16 Public transport provision in the Borough is generally good for people without disabilities but less good for those with disabilities or access needs. There are 14 over-ground railway stations evenly spread throughout the borough and nine underground stations predominantly in the north. However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. Access to public transport is good in north and central Lambeth however; residents in Streatham and West Norwood are dependent on rail and bus connections. As Lambeth has one of the lowest car ownership rates in London, there is even more reliance on public transport.

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

Table 2: Key sustainability statistics in Lambeth

Social	
Crime	<ul style="list-style-type: none"> ▪ There has been a 24% reduction in these priority crimes since 2012 with significant reductions in priority crime types in recent years apart from Violence with Injury (SOB 2016) ▪ Lambeth has the 6th highest crime rate in London; the 2nd highest rate for Violence with Injury, Sexual Offending and Drugs, and the third highest number of Anti-Social Behaviour (ASB) calls to Police compared to the rest of London (SOB 2016) ▪ Some categories of hate crime have increased from 2017/18 – 2018/19; Transgender hate offences have increased by 50% and homophobic offences by 13% ▪ More than nine in ten residents (97%) agree that they feel safe walking in their local area during the day.
Health	<ul style="list-style-type: none"> ▪ Both male and female life expectancy is lower than national averages. ▪ Lambeth male life expectancy is 78.5 years (one year lower than national average) ▪ Lambeth female life expectancy is 83 years (slightly above national average) ▪ In some of the most deprived wards in Lambeth, life expectancy is 5.6 and 3.8 lower for men and women respectively when compared with the borough's least deprived areas ▪ Over 85% of people in Lambeth say they are in good or very good health. ▪ About 6% of Lambeth residents have their day-to-day activities limited a lot by a long-term health problem or disability (18,600 people), and another 6.6% (20,000 people) are limited a little (SOB 2016).
Infrastructure	<ul style="list-style-type: none"> ▪ Existing transport infrastructure is very well used and over capacity in places; step-free access could be improved. ▪ With investment in West Norwood capacity would increase the amount of available burial plots to 2750 which will meet need for next 15 years ▪ There are over 60 parks and open spaces in Lambeth, 16 of which have been awarded the Green Flag award
Equality	<ul style="list-style-type: none"> ▪ About 37,000 people in Lambeth say their day-to-day activities are limited by a long term illness or disability, about 17,000 limited a lot, and 20,000 limited a little. ▪ Black people make up around a third of the population (30.4%). Lambeth's largest non-white ethnic group is black African (11.5%), followed by black Caribbean (8.8%). ▪ Around 17,000 people (6% of the population) speak a main language other than English, mostly EU and African languages ▪ Over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest group of residents by religion, which have differing ethnic profiles. ▪ None of Lambeth's twenty-one wards is in the 10% poorest in London and Clapham Common ward is in the 10% most affluent. ▪ Measuring poverty as having a household income below 60% of the median income, there are an estimated 49,000 people in poverty in Lambeth before housing costs, and 87,000 people in poverty after housing costs. ▪ IMD 2015 places Lambeth as the 8th most deprived borough in London and 22nd most deprived in England.
Housing	<ul style="list-style-type: none"> ▪ 73% of stock is flats – typical of inner London ▪ Around 67 per cent of households live in rented accommodation (both social and private rented) and 33 per cent own their own home, similar to other inner London boroughs. ▪ Seventeen per cent of households rented from the council in 2016, down from 29 per

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	<p>cent in 2001. The proportion of private renters increased from 18 per cent to 33 per cent during this period</p> <ul style="list-style-type: none"> ▪ The number of households in the borough is projected to grow from 143655 to 172649 in 2036 (Lambeth SHMA).
Liveability	<ul style="list-style-type: none"> ▪ Population churn is at around 22-24% for last few years; about 80% of population remains same each year ▪ In 2016 nine in ten (94%) residents see their local area as a place where people from different backgrounds get along well together, up from 87% in 2015.
Heritage	<ul style="list-style-type: none"> ▪ 62 Conservation Areas covering approximately 30 per cent of the borough including circa 2,500 listed buildings
Environmental	
Biodiversity	<ul style="list-style-type: none"> ▪ 7 priority habitats in Borough ▪ 48 Sites of Importance for Nature Conservation
Carbon emissions	<ul style="list-style-type: none"> ▪ Total energy consumption in Lambeth equates to 3.1 per cent of the total energy consumption in London and Lambeth ranks 20th out of the 33 London boroughs ▪ In 2017, Lambeth had lower levels of carbon dioxide emissions at 2.8 tonnes per capita than London as a whole (3.4 tonnes) and England (5.1 tonnes) and the carbon dioxide emissions continue to fall
Flood risk	<ul style="list-style-type: none"> ▪ Much of north of Borough is within flood zone 3a for 1 in 100 year flooding from Thames ▪ Some flood risk around River Wandle
Water	<ul style="list-style-type: none"> ▪ Average household water consumption is about 166.5 litres per person per day
Waste	<ul style="list-style-type: none"> ▪ Lambeth produces around 121,000 tonnes of local authority collected waste a year and around 100,000 tonnes of business waste. ▪ The majority of Lambeth's waste is exported to facilities within London in the first instance
Air	<ul style="list-style-type: none"> ▪ Whole Borough in Area Quality Management Area ▪ There are five air quality focus areas in the borough ▪ The three major sources of emissions in the borough are from residential and commercial premises (mainly gas boilers) and construction sites (dust and machinery emissions) – with emissions from construction activities noted to be increasing
Economic	
Economy	<ul style="list-style-type: none"> ▪ There are 140,500 people employed in Lambeth, with a significant concentration of jobs in the north of the borough. Employment has grown more slowly in Lambeth than the London average since 2002, while the borough also has a relatively small business base. ▪ The two biggest sectors in for employment within Lambeth are human health and social work and administrative and support services. ▪ Whilst unemployment in 2014 was the lowest in ten years, there was an increase from 6% to 7% in 2015, which is still amongst the lowest in the last decade. ▪ In the year to June 2015, 85% of white working age residents were in employment compared to 66% of BME working age residents. ▪ Lambeth has the highest rate of long-term JSA claimants in London, the second highest level of JSA claimants aged 50 and over, and young people in Lambeth are more likely to claim JSA than the London average. ▪ The business base in Lambeth is comparatively small but the number of new businesses being created in the borough has increased significantly, with 1,445 small business enterprises in the borough. ▪ Following the national trend, self-employment and part-time working have both increased in Lambeth and 35,000 Lambeth residents are estimated to be self-employed
Regeneration	<ul style="list-style-type: none"> ▪ A number of regeneration projects current in Borough including Brixton, Waterloo opportunity area, Vauxhall, Oval and Kennington Development Area, Clapham and Streatham, West Norwood and Tulse Hill town centres. ▪ Estate regeneration projects include Knight's Walk, South Lambeth Estate and Westbury and sites within the Central Hill, Cressingham Gardens, and Fenwick Estates.

5 What would happen without the Revised Lambeth Local Plan

5.1 The SA is required to look at what the effect on the current conditions would be if there was no DRLLP PSV 2020. If the Council is to drive growth, manage the consequences of it and secure benefits for residents, then it is essential to have an up-to-date Local Plan. If there was no Revised Local Plan there would be a risk that policies within the existing adopted Local Plan would be considered 'out-of-date' under the National Planning Policy Framework (NPPF), certainly by 2020. In this situation decisions would be made following national and regional policies, which may not always be appropriate for the local context of Lambeth.

- 5.2 For example, as long as development proposals meet the NPPF definition of sustainable development, applications must be approved. This may result in more student housing than desired for the borough for example, or loss of employment generating land or lower than desired standards of sustainability of the built form/public realm.
- 5.3 Another issue is that there is an increasing demand for housing and especially genuinely affordable and sustainable housing within the borough. Absence of a Revised Local Plan would not be likely to provide the amount of affordable housing needed in the right locations in the borough. There are a high proportion of apartments within Lambeth. Different types and sizes of housing are needed and this may not be achieved as effectively without an up-to-date Revised Local Plan.
- 5.4 In general, development agreed without an up-to-date Revised Local Plan may not fit local needs. For example, the right development may not happen in our town centres (for example too many food and drink uses or betting shops) and the right services and facilities might not be developed for the expected growth in population.
- 6 Key sustainability issues**
- 6.1 The diverse character of Lambeth has resulted in a number of complex sustainability issues (see Table 3 below).

Table 3: Summary of key sustainability issues in Lambeth

Lambeth key issue	London key issue¹	Notes – KEY ISSUE SUMMARY
Increase the overall supply and mix of housing, including affordable housing. Capacity for conversions.	Lack of affordable housing; Under-supply of homes which meet the needs of Londoners (size, type, tenure); High level of approvals, low level of completions; Increasing costs of housing relative to wages; Homelessness; Implications from major Government reforms to housing legislation and policy	Access to good housing; Affordable housing; Sustainable housing; Housing mix, types, tenures.
Conserve, protect and enhance heritage assets, their settings and the wider historic environment as part of reinforcing local distinctiveness and place-making	Heritage assets at risk from neglect, decay, inappropriate development and air pollution; Views and vistas to heritage assets are at risk from increased development pressures; Potential harm to the significance of heritage assets and wider historic environment through inappropriate development.	Built heritage; Views and vistas.
Provide the essential infrastructure to support population growth.	Significant increase in the population; Young profile; Ageing and more diverse population; Uncertainty of the composition of the population, including migration patterns; Insufficient secondary school places to meet growing needs; Increased pressure on London's infrastructure as a result of growth and increased economic activity; Lack of high speed and efficient connectivity (digital) across all parts of London; Need to improve sewer and wastewater infrastructure capacity	Infrastructure provision, including healthcare services and facilities; digital connectivity and schools.

¹ Taken from IIA of London Plan (Nov 2017)

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Lambeth key issue	London key issue ¹	Notes – KEY ISSUE SUMMARY
<p>Develop mixed, cohesive, safe communities accessible to all.</p>	<p>Increasing aging and diverse population; Persistent causes of Multiple Deprivation High levels of poverty in some parts of London, with rates of child poverty continuing to exceed national levels; Discrimination; Isolation; Population churn and impact on community cohesion; Gentrification; Increased threat of major incidents and unplanned events; Perceptions of lack of safety; Fear of crime creating barrier to activities leading to increased social isolation; Vulnerability of different groups of people at greater risk of crime; More vibrant night-time economy leading to increased risk of crime</p>	<p>Mixed communities; Cohesive communities; Safe communities; Accessible communities; Meeting the needs of diverse communities; Addressing social inequities; Tackling crime; Tackling terrorism; Addressing fear of crime.</p>
<p>Provide good access to local services and community facilities within neighbourhoods.</p> <p>Increase public transport accessibility and promote walking and cycling.</p>	<p>Poor orbital connectivity by all modes of public transport in outer London; Poor connectivity across the River Thames in east London; Reduced transport connectivity across London as a result of congestion and overcrowding on services and roads; Reduced connectivity across London by walking as a result of congestion and overcrowding on pavements and footpaths; Increasing airport capacity will impact on the spatial and economic fabric of the city; Barriers to using public transport; Poor design of the built environment; Loss of pubs, cinemas, creative workspace, live music and other cultural facilities and risk of harm to heritage assets; Inequality in access to cultural venues</p>	<p>Good local access to services and facilities; Tackling congestion; Increase public transport use, accessibility and provision, cycling and walking.</p>
<p>Increase the number and variety of jobs in the local economy, including local jobs for local people.</p>	<p>Disparities between rates of employment among London's residents; Disparity between wages and cost of living; Lack of diversity in jobs provided; Growth of low paid employment and zero hours contracts; Lack of support for transition from education to work, especially for young women; Large variations in educational performance across London</p>	<p>Increasing jobs, particularly local jobs for local people; Addressing high rates of child poverty; Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups; Tackling barriers to employment; London's role in the UK economy.</p>
<p>Support the growth of key economic sectors through new business development, business retention and inward investment.</p>	<p>Changing global economy; London's Productivity; Potential loss of agglomeration benefits; Increased pressure on London's infrastructure as a result of growth and increased economic activity; Risk that infrastructure could constrain economic growth; Lack of high speed and efficient connectivity (digital) across all parts of London; Loss of employment land as a result of increased pressure for housing; Insufficient amount of floorspace available to meet identified needs;</p>	<p>New business development; Business retention; Inward investment; Digital connectivity Targeting key economic sectors.</p>

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Lambeth key issue	London key issue ¹	Notes – KEY ISSUE SUMMARY
<p>Create viable, safe and well managed town centres:</p> <ul style="list-style-type: none"> ▪ Brixton ▪ Streatham ▪ Clapham ▪ Stockwell ▪ West Norwood / Tulse Hill <p>Support the regeneration of Vauxhall and Waterloo Opportunity Areas</p>	<p>Affordability of business space, particularly for small and medium sized enterprises and start-ups</p> <p>Impact of mixed use development – night-time economy and residents;</p> <p>Impact on town centres as a result of a reduction in demand for retail floorspace;</p> <p>Poor quality public realm in some parts of London which can discourage active travel;</p> <p>Risk of poor design, harm to the distinctive character of places lack of legible neighbourhoods and sense of place</p>	<p>Viable, safe and well managed town centres.</p>
<p>Support the regeneration and renewal of London Plan Opportunity Areas.</p>	<p>Development and Regeneration. The sustainable development and regeneration of London, including areas of deprivation. The Opportunity and Intensification Areas offer significant potential for sustainable development to meet London’s housing and employment needs.</p>	<p>Regeneration of London Plan Opportunity Areas.</p>
<p>Reduce carbon emissions from residents, businesses, public services and buildings.</p> <p>Implement measures to help Lambeth adapt to the consequences of inevitable climate change, including flood risk management</p>	<p>London is not currently meeting the Mayor’s CO₂ emission target;</p> <p>Transport will continue to contribute significantly to CO₂ emissions;</p> <p>CO₂ emissions from buildings continue to rise;</p> <p>London is no longer a global leader in terms of transitioning towards a low carbon economy;</p> <p>Increase in extreme weather events such as flood risk, drought and heat risk and associated impacts;</p> <p>Changing demographics such as an ageing population and more under five year olds increasing the number of potentially vulnerable people;</p> <p>Design of building causes a larger variation in temperature exposure than the Urban Heat Island (UHI) effect;</p> <p>Risk of flooding to property and people from river, surface water, tidal, sewer, ground water and reservoir;</p> <p>Increase in run-off and potential contamination and disruption of flows;</p> <p>Necessary infrastructure needs to be planned for, funded and implemented to support growth and development</p>	<p>Reducing CO₂ emissions.</p> <p>Climate change adaptation, including flood risk management</p>
<p>Maximise the efficient use and management of resources, including water, energy and waste.</p>	<p>Inability for London to accommodate required growth within its boundaries; Unsustainable patterns of development within and across London’s boundaries;</p> <p>Higher densities development;</p> <p>Competing pressures for land impacts on ability to provide social, physical and environmental infrastructure;</p> <p>Non-efficient use of land; Integration of land use and transport;</p> <p>Spatial impact and consequential development pressures resulting from decision on London’s future airport capacity;</p> <p>Relatively high and ineffective use of fossil fuels contributing towards London’s GHG emissions and air pollution;</p> <p>Insufficient low carbon energy supply;</p> <p>High number of Londoners in fuel poverty.</p> <p>Energy-inefficient building stock & transport;</p> <p>Un-utilised local energy resources;</p>	<p>Efficient use and management of resources;</p> <p>Efficient use and management of water: addressing increasing demand;</p> <p>Efficient use and management of energy;</p> <p>Efficient use and management of waste: increasing recycling rates and self-sufficiency in</p>

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

Lambeth key issue	London key issue ¹	Notes – KEY ISSUE SUMMARY
	increased recreational pressure on existing habitats and green spaces; Deficiencies in open spaces in some parts of the city; Impact of climate change and threat of new pests and diseases; Poor connectivity to green infrastructure for all	green infrastructure; Increase amount of open space and green infrastructure.

7. Sustainability Appraisal Framework

7.1

The SA Framework is a way of considering the effects of the Local Plan. It is a list of social, economic and environmental objectives that the Plan is tested against. The framework used is shown in the table below, which also shows how each objective meets SEA topic requirements. The SA Framework was developed in the Scoping Report and has since been updated in response to consultation comments received. As a result, the SA Framework presented below is slightly different to that presented in the Scoping Report.

Table 4: Revised Sustainability Objectives and SEA Topic Requirement

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

	performance of businesses.	
18	Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings, taking into account constraints such as contaminated land..	Material Assets, Soil
19	Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	Population, Material Assets

8 Sustainability Appraisal Findings

8.1 An appraisal has been carried out on the sustainability of the DRLLP PSV 2020 policies. The spatial strategy, vision and objectives are largely the same as those in the adopted Lambeth Local Plan 2015. As they were appraised then, there is no need to appraise them again. Summary results of this previous appraisal of the vision and objectives are shown below:

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

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

Effects of DRLLP PSV 2020 policies on SA Objectives

8.2 First, it is important to point out that the level of growth proposed for the borough is required by the London Plan. The Draft London Plan, in its preparation, was itself subject to SA in 2017– this was called an Integrated Impact Assessment (IIA).

8.3 The effects of the DRLLP PSV 2020 on individual SA objectives are outlined below in Table 6. On the whole it is considered that the DRLLP PSV 2020 policies have been produced with sustainability actively in mind.

8.4 Generally, the SA has found that the DRLLP PSV 2020 policies seek to achieve significant positive social and economic effects and avoid or reduce the effect of (mitigate) significant negative effects. It has found that the scale, type and level of development proposed in the DRLLP PSV 2020 will not give rise to significant negative effects on biodiversity, landscape, historic environment and natural resources. This is because of the protective nature of policies in the DRLLP PSV 2020. It is recognised that there will be increases in carbon emissions and water use associated with increased population growth, but policies which have been included in the DRLLP PSV 2020 together with London Plan policies seek to mitigate the effects. The SA was not able to be definite about this because of uncertainties about the effects of these mitigation policies, which are discussed further below.

8.5 Uncertainties on the implementation of the DRLLP PSV 2020 are mainly about delivery of required housing, transport improvements and additional social services

and facilities to support population growth, and how successful environmental policies would be.

- 8.6 Environmental issues which the SA could not be certain about were:
- whether higher environmental standards for development will be achieved (use of Passivhaus or Home Quality Mark and higher BREEAM standards);
 - achievement of target scores for the urban greening factor (and whether living roofs and walls will be included in new development);
 - how much carbon emissions will be reduced across the borough given the amount of growth proposed through the DRLLP PSV 2020;
 - whether air quality will be significantly improved;
 - ambitiousness sought by developer/secured by the council (including the rigour to which policies are applied at the planning application stage); and
 - attitude and behaviours of occupiers relating to energy, water and waste use.

SA Recommendations

- 8.7 A total of 14 recommendations have been made in this SA on the DRLLP PSV 2020 with the aim of improving the impact of policies on sustainability or reducing potential for negative effects. Many recommendations involve strengthening policies with regards to accessibility and inclusiveness. For example, policy H5 reinforcing requirements for *accessible* housing; and that children's play space should be *inclusive* as well as accessible. Policy T1 - that development should contribute towards improvement of *inclusive* access to public transport; that Lambeth will seek better *accessibility* in public transport (policy T4); and that new social infrastructure buildings and facilities are designed to promote *social inclusion*. Other recommendations include ensuring family-sized units are considered for the housing mix of market housing provision; better providing for actual useability of external amenity space; encouragement to exceed minimum internal space standards; clarification that London Plan guidance and standards apply relating to design and quality of housing; recognition of the social value of markets; and the importance of planning for safety, crime prevention and counter terrorism in visitor attractions, leisure, arts and cultural uses. Recommendations were also made regarding climate change and carbon emissions (policy EN4 and Q18). Positively all 14 recommendations were accepted by the policy team and have been incorporated into the DRLLP PSV 2020 (see Appendix 1).
- 8.8 The SA on the Draft Revised Lambeth Local Plan October 2018 resulted in 98 recommendations (see Appendix 1). The policy team considered each of these recommendations in preparing the DRLLP PSV 2020. Appendix 1 provides the full schedule of SA recommendations made in the SAs on DRLLP 2018 and DRLLP PSV 2020.
- 8.9 The Sustainability Appraisal has scored the sustainability effects of the DRLLP PSV 2020 using the symbols shown in Table 5. Table 6 presents the likely effects of the DRLLP PSV 2020 taking into account SA recommendations.

Table 5: Key symbols used in the appraisal

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

Consideration of Reasonable Alternatives to policy approach

- 8.10 Reasonable alternative (RA) approaches have been considered in the revised Lambeth Local Plan plan-making process for the ten key issues considered in the partial review: housing growth and infrastructure; affordable housing; housing for older people; self-build housing; business and jobs; town centres; hotels; waste; air quality; and transport. These issues were explored through a series of topic papers and questions to help facilitate consultation and feedback, with links to further evidence where relevant. The topic papers identified different possible ways (reasonable alternatives) of addressing the key issues. An SA was prepared on the reasonable alternatives identified in the topic papers/online surveys (see Appendix 2). The results of the SA work on the issues and reasonable alternatives has helped inform the plan-making process. As the spatial strategy, vision and objectives of the DRLLP PSV remain largely unchanged from the Lambeth Local Plan 2015, previous SA work undertaken on the Lambeth Local Plan 2015 (and Core Strategy), including on reasonable strategic alternatives remains relevant.
- 8.11 The process of preparing the DRLLP 2018 and then the DRLLP PSV 2020 has involved consideration of alternative approaches for policy, consultation responses, evolution of draft London Plan as well as SA recommendations made throughout the plan-making process. The policy team has reported that in determining the policy approach to progress for each revised local plan issue, it is important to stress that the SA on the issues and reasonable alternatives was only one consideration, alongside consultation results, evidence and conformity with regional and national policy requirements. In other words, no decision about which option to pursue was made solely on the basis of the SA. All iterations of the local plan to date (including the DRLLP PSV) have contained a strong drive towards housing growth (in line with draft London Plan targets). The balance between maintaining a stock of industrial land and retaining industrial floorspace capacity as required by draft London Plan on the one hand; and accommodating housing capacity and finding capacity for increased delivery of housing has largely remained the same throughout the plan review process.
- 9 Designated sites, including European Nature Conservation sites**
- 9.1 The council has considered whether the DRLLP PSV 2020 is likely to have an effect on European wildlife sites, as required under European legislation. No European Sites lie wholly or partly within Lambeth Borough. Four European Sites (Richmond Park, Walthamstow Reservoirs, Wimbledon Common and Epping Forest) lie partially within 15 kilometres of the Lambeth Borough boundary. An initial screening assessment was prepared on the Draft Revised Lambeth Local Plan October 2018 which concluded that the draft Plan would not have an adverse impact on the integrity of the four sites. This initial screening assessment was made available for public comment for 8 weeks and no comments were received on the screening assessment. The screening assessment has since been updated for the DRLLP PSV 2020 and similarly has not identified any likely significant adverse effects on any European Site. Accordingly it is considered that the DRLLP PSV 2020 would not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage of Habitats Regulation Assessment (HRA) is not required.
- 9.2 It is considered that the Designated Sites of Nature Conservation Importance of Metropolitan, Borough and Local Importance are well protected for by policies in the DRLLP PSV 2020.

10 Technical difficulties / data limitations

10.1 The SA process is a useful way to identify potential issues and make suggestions to reduce possible negative impacts. It tests how policies work against sustainability objectives. However, there are a number of uncertainties and limitations that exist in the sustainability appraisal process, which are summarised below:

- The principal source of difficulty undertaking the SA is the reliance on the judgement of predicting and assessing effects. However, the SA has been undertaken by a professional in town planning and sustainability issues. Consultation on the SA report has also added value to the process through the views of other 'experts' and interested stakeholders to review the effects identified and provide alternative opinions for further consideration.
- Difficulties have been experienced in predicting the impact of the DRLLP PSV 2020 in the long term (for example uncertainties under the current difficult economic climate, funding gaps for some infrastructure projects and arrangements for how the UK will leave the EU). This has made it difficult to accurately appraise the sustainability of some policies.
- Difficulties distinguishing the influence of the DRLLP PSV 2020 from other external factors. For example whilst specific local conditions such as air quality, carbon emissions or health could be getting worse, this could be due to various factors beyond the control of the DRLLP PSV 2020, and the DRLLP PSV 2020 itself may still have a positive influence in so far as planning can influence such areas.
- A further difficulty was deciding how *significant* the effects of the DRLLP PSV 2020 are. This is particularly true for sustainability objectives such as health which are influenced by a wide range of factors.

11 Conclusion

11.1 Overall, it is considered that the DRLLP PSV 2020 provides a good spatial and policy framework that is in accordance with sustainable development principles. As noted earlier, the SA has identified a number of uncertainties. These particularly relate to the effectiveness of environmental policies, and whether or not housing and supporting services and facilities, including transport infrastructure improvements will be delivered. However, in general it was found that implementation of the DRLLP PSV 2020 is likely to result in significant positive social and economic effects.

Table 6: Summary of SA findings

Score	Timescale	Probability	Permanent or temporary	Indicators to monitor significant and uncertain effects
1. Ensuring safe communities with reduced crime and disorder				
++	Medium to long term	Likely	Permanent	<ul style="list-style-type: none"> Percentage of proposals directly incorporating 'Secured by Design', 'Designing Out Crime' and 'Safer Places' principles or receiving Secure by Design accreditation Recorded crimes per 1,000 households Resident surveys on perception of crime and level of safety in town centres Resident surveys on perception of crime and level of safety in public open spaces.
2. Promoting a healthy borough with better healthcare services, reduced health inequalities and by reducing the causes of ill health				
++	Medium to long term	Likely	Permanent	<ul style="list-style-type: none"> Infrastructure Delivery Plan updates Amount of open space lost through completed planning permissions Housing supply: number of net additional dwellings completed Tenure of new affordable housing (completions and approvals) Modal Share – walking, cycling and public transport Number of cycle parking spaces provided in completed major developments Number of disabled parking spaces per completed major development Life expectancy
3. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities				
+/?/-	Public realm improvements – medium term Large scale transport improvements – long term	Likely Funding for public transport capacity/accessibility improvements uncertain at this stage	Permanent and temporary (until improvements delivered)	<ul style="list-style-type: none"> Number of disabled parking spaces per completed major development Modal Share – walking, cycling and public transport Infrastructure Delivery Plan updates Average distance of households and bus stations to health/medical centres Proximity of new housing developments to services, facilities and employment
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands				
?	Medium to long term	Likely although some infrastructure improvements (healthcare, transport) are uncertain at this time	Permanent with temporary effects until such infrastructure is delivered. Also temporary construction effects	<ul style="list-style-type: none"> Infrastructure Delivery Plan updates
5. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion				
++/?	Infrastructure to support growth – long term; otherwise short - medium term	Transport is uncertain, otherwise achievement is likely	Permanent with temporary effects until necessary infrastructure/regeneration is delivered.	<ul style="list-style-type: none"> Gross affordable housing - % of habitable rooms in major developments (completions and approvals) Tenure of new affordable housing (completions and approvals) Net additional student bedspaces completed Number of specialist older persons housing units completed

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				<ul style="list-style-type: none"> ▪ Gypsy and traveller pitches ▪ Net additional affordable workspace floorspace (completions and approvals) ▪ Number of disabled parking spaces per completed major development ▪ Infrastructure Delivery Plan updates ▪ Resident surveys on perception of crime and level of safety in town centres ▪ Resident surveys on perception of crime and level of safety in public open spaces.
6. Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity				
++/?	Mid- Long term	Likely	Permanent Temporary construction effects	<ul style="list-style-type: none"> ▪ Housing supply: number of net additional dwellings completed ▪ Gross affordable housing - % of habitable rooms in major developments (completions and approvals) ▪ Tenure of new affordable housing (completions and approvals) ▪ Net additional student bedspaces completed ▪ Number of specialist older persons housing units completed ▪ Gypsy and traveller pitches ▪ Resident survey satisfaction on housing
7. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place				
++/?	Mid-Long term	Likely	Permanent	<ul style="list-style-type: none"> ▪ Proportion of vacant units in Brixton and Streatham Major centres, Clapham and West Norwood District centres and Waterloo and Vauxhall CAZ Retail Clusters. ▪ Modal Share – walking, cycling and public transport ▪ Number of cycle parking spaces provided in completed major developments ▪ Number of disabled parking spaces per completed major development ▪ Amount of open space lost through completed planning permissions ▪ Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Infrastructure Delivery Plan updates ▪ Diversity of resident ethnicity ▪ Resident surveys on satisfaction parks and open spaces ▪ Resident surveys on perception of crime and level of safety in public ▪ Level of population churn
8. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets				
++	Historic and open spaces environments – short term and continuing; redevelopment / public realm medium to long-term as developments complete	Likely	Permanent	<ul style="list-style-type: none"> ▪ Amount of open space lost through completed planning permissions ▪ Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Number of heritage assets on the 'at risk' register ▪ Number of conservation areas with up-to-date character appraisals ▪ Infrastructure Delivery Plan updates ▪ Number of listed buildings within the borough

9. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport				
++/?	Walking and cycling short – long term; major transport infrastructure long-term	Likely but funding for some major transport infrastructure projects currently uncertain / not secured	Permanent Temporary effects associated with construction	<ul style="list-style-type: none"> ▪ Modal Share – walking, cycling and public transport ▪ Number of cycle parking spaces provided in completed major developments ▪ Number of disabled parking spaces per completed major development ▪ Infrastructure Delivery Plan updates
10. To conserve and enhance biodiversity and to bring nature closer to people				
++/?	Short-term and enhancements short-medium term	Likely	Permanent; and temporary construction effects	<ul style="list-style-type: none"> ▪ Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Amount of open space lost through completed planning permissions ▪ Change in areas of biodiversity importance ▪ Number of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls) ▪ The achievement of BAP targets ▪ The change in area and condition of BAP habitats/species ▪ The change in area of Sites of Importance for Nature Conservation ▪ Percentage of borough by area located in an access to nature deficiency area
11. To create, manage and enhance green infrastructure				
++/?	Short term and new green infrastructure provision short-medium term as it establishes.	Likely – but also dependent on rigour to which policy is applied and enforced	Permanent	<ul style="list-style-type: none"> ▪ Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Amount of open space lost through completed planning permissions ▪ Change in areas of biodiversity importance ▪ Number of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls)
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.				
+/?	Long term	Dependent on delivery of transport infrastructure, district heating networks and viability of sustainability measures in built environment	Temporary construction effects; otherwise permanent	<ul style="list-style-type: none"> ▪ The proportion of schemes achieving policy requirements relating to carbon dioxide emission reductions ▪ Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score ▪ Amount of open space lost through completed planning permissions ▪ Change in areas of biodiversity importance ▪ Number of major application approvals for non-residential developments achieving BREEAM Excellent ▪ Number of homes built to Home Quality Mark or Passivhaus standard ▪ Number of DHNs in the borough and dwellings/premises linked to them.

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13. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk				
+/?	Medium to long-term	Dependent on viability in implementing water efficiency measures; reducing flood risk is uncertain given high levels of development	Permanent	<ul style="list-style-type: none"> Number of developments which have had Surface Water Flood Risk Assessments approved by the Environment Agency and incorporate sustainable urban drainage systems Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality issues. Infrastructure Delivery Plan updates
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing reuse, recycling, remanufacturing and recovery rates				
+/?	Long-term in terms of funding and identifying and occupying new sites; short –medium term with regards to bring vacant buildings back in use	Uncertainty on funding for recycling and reuse centre (the project has not been progressed under IDP) and uncertainty of new waste operators coming forward and locating in borough	Temporary construction waste; otherwise permanent in management facilities once delivered, building back in use	<ul style="list-style-type: none"> New waste capacity (tonnes) by management type (recycling/composting, recovery, transfer and disposal) and type of wastes handled (HIC and CD&E) Loss of waste sites to other uses. Location and amount of compensatory capacity Waste exports (amount, type of waste and destination) Infrastructure Delivery Plan updates
15. To improve air quality				
?/+	Localised efforts to improve air quality – medium term Various transport infrastructure delivery (including Healthy Routes network) and Vauxhall gyratory remodelling – long term	Likely – localised improvements Uncertainty on delivery of new transport infrastructure and improved air quality	Permanent with ongoing management; and temporary with regards to construction effects	<ul style="list-style-type: none"> Percentage of residents with health problems related to air pollution/quality Improvement of air quality at the monitoring stations around the Borough Infrastructure Delivery Plan updates Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score Amount of open space lost through completed planning permissions Change in areas of biodiversity importance The proportion of schemes achieving policy requirements relating to carbon dioxide emission reductions Modal share – walking, cycling and public transport
16. To maximise the education and skills levels of the population				
+	Existing schools and community services safeguarded. Short-medium term for up skilling and apprenticeships	Likely	Permanent	
17 & 19. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses; AND Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.				
++/?	Short-term (construction) and long-term as developments occupied	Likely although may be slower to eventuate in current economic climate and uncertainty in how the UK will leave	Permanent	<ul style="list-style-type: none"> Net change in B1a floorspace through completed developments (including prior approvals) Net loss of B1a floorspace through completed Prior Approval developments (ie permitted development for change of use from office to residential) Net additional affordable workspace floorspace (completions and approvals)

Non-technical Summary

Sustainability Appraisal Draft Revised Lambeth Local Plan Proposed Submission Version 2020

		the EU		<ul style="list-style-type: none"> ▪ Net change in completed B1b, B1c, B2 and B8 floorspace in KIBAs and outside KIBAs ▪ Proportion of original ground floor units in A1 retail use in <ul style="list-style-type: none"> a) i) Lower Marsh/The Cut/Leake Street Special Policy Area ii) Streatham Hill Primary Shopping Area iii) Streatham Central Primary Shopping Area iv) Clapham Primary Shopping Area. ▪ b) Vauxhall CAZ Cluster. ▪ c) Brixton Primary Shopping Area ▪ Proportion of vacant units in Brixton and Streatham Major centres, Clapham and West Norwood District centres and Waterloo and Vauxhall CAZ Retail Clusters ▪ Proportion of original ground floor units in A3/A4/A5 food and drink use in <ul style="list-style-type: none"> i) Streatham; ii) Clapham; and iii) Brixton Primary Shopping Areas ▪ Proportion of original ground floor units in A3/A4/A5 food & drink or nightclub use in Brixton Evening Economy management area ▪ Net additional visitor accommodation bedspaces ▪ Unemployment rates ▪ Number of businesses registered in the borough ▪ Number of vacant premises in town centres ▪ Total amount of additional employment floor-space, by type ▪ Total amount of employment floor-space, by type ▪ Total amount of floor-space for 'town centre uses'
18. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in landuse through reuse of previously developed land and existing buildings.				
++	Short term and ongoing	Likely	Permanent	<ul style="list-style-type: none"> ▪ Number of existing vacant or dilapidated / derelict buildings brought back into use ▪ Number of regeneration projects completed in deprived areas. ▪ Housing supply: number of net additional dwellings completed

1.0 INTRODUCTION

- 1.0.1 Lambeth Council has prepared a Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (DRLLP PSV 2020) development plan. The existing Local Plan, adopted in 2015, contains a strong vision for the development of the borough to improve opportunities for local people. It sets the planning policies for the borough and much of it is still up-to-date and effective. However, changes to national planning law and policy, a full review of the London Plan and changes in Lambeth mean parts of the adopted Local Plan needed to be reviewed.
- 1.0.2 Section 39 of the Planning and Compulsory Purchase Act 2004 requires local authorities to undertake a Sustainability Appraisal (SA) for Development Plan Documents and Supplementary Planning Documents. The EU Directive 2001/42/EC requires the Strategic Environment Assessment (SEA) of the *environmental* effects of certain plans and programmes on the environment. The SA extends the reach of the SEA to incorporate *economic* and *social* issues relevant to the plan or programme. Therefore, this report assesses the environmental, social and economic effects of the Draft Revised Lambeth Local Plan Proposed Submission Version 2020.
- 1.0.3 Government guidance has defined Sustainability Appraisal as:
- “...A systematic and iterative appraisal process, incorporating the requirements of the Strategic Environment Assessment Directive. The main purpose of Sustainability Appraisal is to appraise the social, environmental and economic effects of plans, strategies and policies, from the outset of the preparation process, so that decisions can be made that accord with the objectives of sustainable development.”* (Office for the Deputy Prime Minister, 2005).
- 1.0.4 A SA is the systematic process undertaken during the preparation phases of a plan or strategy. The process tests the overall plan, including each policy against the sustainability objectives that have been agreed for this purpose. The purpose of the SA is to inform the decision making process, by highlighting the potential implications of pursuing a particular strategy or policy response. Therefore, the final version of the Local Plan may be altered during the process, if appropriate, to maximise benefits, and minimise adverse effects as identified in the SA process.
- 1.0.5 The Lambeth Local Plan is part of the statutory development plan for Lambeth, alongside the Mayor of London’s London Plan and any adopted neighbourhood development plans. Together these documents set the policy context for growth and development in the borough and provide the basis for determining planning applications. A London borough local plan must be ‘in general conformity’ with the London Plan. This means the strategy and policy approach should not contradict that established at regional level: borough local plan policies should be used principally to reinforce and add local detail to the London-wide approach. The London Plan underwent a full review initiated by the Mayor in 2017. The timing of the review of the Lambeth Local Plan has been designed to follow just behind the new London Plan. The new London Plan is expected to be adopted in 2020. The London Plan has itself been subject to an integrated impact assessment in 2017 (https://www.london.gov.uk/sites/default/files/draft_london_plan_ia.pdf). This combined four assessments into one document: Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Community Safety Impact Assessment (CSIA) and Equality Impact Assessment (EqIA). The integrated impact assessment has been referred to during the SA process of the Revised Lambeth Local Plan.
- 1.0.6 The overall aim of the appraisal process is to help ensure that the Revised Lambeth Local Plan plan-making process makes an effective contribution to the pursuit of ‘sustainable development’, which is widely defined as ‘development that meets the needs of the present without compromising the ability of future generations to meet their own needs’ (World Commission on Environment and Development, 1987). The UK Government Sustainable Development Strategy

(2005) describes the UK Government's position on sustainable development. The Report details the following five guiding principles to help achieve sustainable development:

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

1.0.7 In 2015 world leaders at the United Nations agreed 17 Sustainable Development Goals (SDG) as part of the 2030 Agenda for Sustainable Development. The SDGs are universal with all signatories expected to contribute to them internationally and deliver them domestically. More information, including some of the ways the Government is supporting the delivery of the Sustainable Development Goals can be found [here](#).

1.0.7 More recently and with specific relevance to planning, the National Policy Planning Framework 2019 outlines the Government's view of what sustainable development in England means in practice for the planning system. It covers three dimensions: economic role, social role and environmental role.

1.1 Objectives and Structure of the SA Report

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

Section 1 has provided background information on the preparation and process of developing the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020, the purpose of an SA Report and the supporting legislative requirements.

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

Section 3 – SA/SEA Methodology describes the SA process including the SEA requirements, consultation conducted, the SA objectives used to appraise the Draft Revised Lambeth Local Plan Proposed Submission Version 2020, and the difficulties encountered.

Section 4 – Characterisation and SA framework provides an overview of the character of Lambeth Borough and describes the process taken to developing the SA framework against which

the Draft Revised Lambeth Local Plan Proposed Submission Version 2020 was assessed.

Section 5 – Appraisal of the Draft Revised Lambeth Local Plan Proposed Submission Version 2020 is the most noteworthy section of this report. Despite only very minor changes proposed for the revised Local Plan objectives (related to updating, factual information) and that the objectives have already been appraised in the SA on the Lambeth Local Plan 2015; for totality the objectives have again been assessed for compatibility against the SA objectives set out in the framework section. Following this, the Draft Revised Lambeth Local Plan Proposed Submission Version 2020 as a whole is assessed against each SA objective. The assessment involves consideration of the following:

the following:

- National, regional, and local level guidance and policy;
- Baseline conditions, existing issues, and likely evolution without the Draft Revised Lambeth Local Plan Proposed Submission Version 2020;
- Likely significant effects of implementing the Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies as a whole, taking into account mitigation; and
- Recommendations for monitoring significant and uncertain effects.

Section 6 – Summary and Conclusions provides a summary of the Draft Revised Lambeth Local Plan Proposed Submission Version 2020, the predicted significant sustainability effects, and an overview concluding analysis of the main issues of concern in the Draft Revised Lambeth Local Plan Proposed Submission Version 2020.

1.2 Equality Impact Assessment

1.2.1 It is important that the SA adequately addresses equality and diversity issues. The council has an adopted approach to undertaking Equality Impact Assessments (EqIA) and this SA seeks to integrate the principles of the EqIA across the SA Framework. This helps to explore the impact of the proposed policy on different equalities groups, (ie. ethnicity, gender, gender re-assignment, disability, age, sexual orientation, religion or belief, socio-economic factors, marriage and civil partnership, pregnancy and maternity, language, health). For example, whilst SA Objective 5 specifically addresses issues of equality and diversity, other objectives also tease out equality impacts via appropriate sub-questions. Throughout the SA and Local Plan process, feedback has been sought from the council's Equalities Panel and team.

1.3 Health and Well-being Impact

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

1.4 Habitat Regulations Assessment

1.4.1 The council has undertaken a Habitat Regulations Assessment – Screening Analysis on the Draft Revised Lambeth Local Plan Proposed Submission Version 2020 as required under European legislation. An initial screening analysis was prepared on the Draft Revised Lambeth Local Plan October 2018 and made available for public comment (including statutory consultees) during regulation 18 public consultation. No comments were received on the initial screening analysis.

1.4.2 No European Sites lie wholly or partly within Lambeth Borough. Four European Sites (Wimbledon Common SAC, Richmond Park SAC, Walthamstow Reservoirs and Epping Forest (extreme southern tip only) lie partially within 15 kilometres of the Lambeth Borough boundary.

The screening assessment on the DRLLP PSV 2020 does not identify any likely significant adverse effects on any European Site. Similarly it is considered that the DRLLP PSV 2020 will not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage is not required on the DRLLP PSV 2020. (It can also be noted that a Habitat Regulations Assessment Screening Analysis was undertaken during the preparation of the Lambeth Local Plan 2015, and that screening assessment did not identify any likely significant adverse effects on any European Site, nor any adverse impact on the integrity of the four European Sites.)

2.0 DRAFT REVISED LAMBETH LOCAL PLAN PROPOSED SUBMISSION VERSION JANUARY 2020

- 2.0.1 The Lambeth Local Plan is part of the statutory development plan for Lambeth, alongside the Mayor's London Plan and any neighbourhood plans that may be adopted. Together these documents set the policy context for growth and development in the borough and provide the basis for determining planning applications. The procedure for preparation and review of Local Plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.0.2 The current Lambeth Local Plan was adopted by the Council in September 2015, following a statutory process of preparation and examination. The Inspector for the Local Plan examination found it sound subject to early review to take account of the higher borough-level housing target in the Further Alterations to the London Plan 2015, which had been published too late to be included in Lambeth's Local Plan 2015. In May 2016 the new Mayor of London was elected and he immediately initiated a full review of the London Plan. The examination of the new Draft London Plan finished in October 2019. The new London Plan is expected to be adopted in 2020. The DRLLP PSV 2020 has been taking into account the draft London Plan and the recommendations set out in the examination panel report.
- 2.0.3 In addition, since September 2015 there have been a number of significant changes to the national planning policy and legislative context, and others are emerging. These include the Housing and Planning Act 2016, the introduction of permissions in principle, ongoing changes to permitted development rights, national commissions into the local plan making process, new National Planning Policy Framework 2019, the Neighbourhood Planning Act 2017, the Housing White Paper 2017 and Build to Rent policy.
- 2.0.4 Like all Development Plan Documents, the Local Plan is a statutory document and will be subject to examination by an independent Inspector. Of particular relevance is the need for the Local Plan to be in general conformity with the London Plan.
- 2.0.4 The DRLLP PSV 2020 sets out the spatial strategy, long term spatial vision, strategic objectives and policies for development, and has a limited number of sites for development within Lambeth to cover the period up until 2035. It is based on the social, economic and environmental objectives and priorities of the Lambeth Borough Plan 2016-2021 (including its revision in 2019), together with other relevant plans, programmes and strategies all of which have implications for the development and land use within the borough. The spatial strategy, long term spatial vision, and strategic objectives are considered relevant and remain largely unchanged from the Lambeth Local Plan 2015. The DRLLP PSV does not include new site allocation policies; these will be brought forward through a subsequent Site Allocations Development Plan Document (SADPD), as set out in the Lambeth Local Development Scheme October 2019. Accordingly previous SA work on the site allocations carried through into the DRLLP PSV remains relevant.
- 2.0.5 The DRLLP PSV guiding spatial approach, in summary is:
- promotion of both economic and housing growth across the borough, with housing supply supporting economic growth by helping to ensure an appropriate supply of labour at both local and sub-regional levels
 - a focus for growth and development on Waterloo and Vauxhall (supporting the London Plan Opportunity Areas) and town centres – including through the regeneration of Brixton – addressing the issues of transport capacity and other physical infrastructure in key locations

- town centre regeneration to include housing in appropriate locations, with some revisions to town centre boundaries
- a centre-specific approach to managing the mix of uses in town centres
- the mix, balance and diversity of residential neighbourhoods to be maintained, with an emphasis on increasing choice in the type and location of affordable housing overall
- contributing to the Mayor’s strategic target of 50 per cent affordable housing by implementing London Plan policy alongside the preferred borough-wide tenure and dwelling-size mix for affordable housing defined in Local Plan policy, based on updated evidence of housing needs in the borough
- an updated approach to managing residential conversions, using a minimum property size threshold and clearly defined criteria
- an approach to density that reflects the London Plan approach of design-led optimisation
- support for tall buildings in appropriate locations to deliver regeneration and economic objectives in accordance with London Plan and Local Plan policies, based on local evidence
- retaining industrial floorspace capacity by updating the policy approach to Key Industrial and Business Areas (KIBAs) to align with the London Plan, but with some revisions to designations and boundaries
- support for community facilities both to enable local service delivery at neighbourhood level and to meet the changing needs of Lambeth’s communities, including planned additional school places.

2.0.6 Box 1 sets out the 19 strategic objectives of the DRLLP PSV grouped under the six key over-arching issues.

DRLLP PSV 2020 Objectives	
A	Accommodating population growth
1	Increase the overall supply of housing by at least 13,350 net additional dwellings by 2028/29, and increase the mix and quality of housing to address the need for all types of housing, including affordable housing and the needs of different groups in the community, as identified through the Strategic Housing Market Assessment.
B	Achieving economic prosperity and opportunity for all
2	Support the growth of key economic sectors and innovation through the development of new offices and commercial premises including new affordable workspace, by maintaining a varied supply of business premises and through plans for town centre regeneration and the development of a new MedTech, healthcare and life sciences cluster at Waterloo.
3	Increase the number and variety of job opportunities for local people by protecting land for commercial use within neighbourhoods and seeking contributions to employment and skills support programmes.
C	Tackling and adapting to climate change
4	Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes.
5	Safeguard and increase biodiversity through co-ordinated implementation of the Lambeth Biodiversity Action Plan.
6	Enable Lambeth to adapt to the effects of climate change, including drought, flood risk and urban heat islands, through the location of development, mix of uses and design of the built environment, sustainable design and construction, retention of existing trees, significant levels of urban greening,

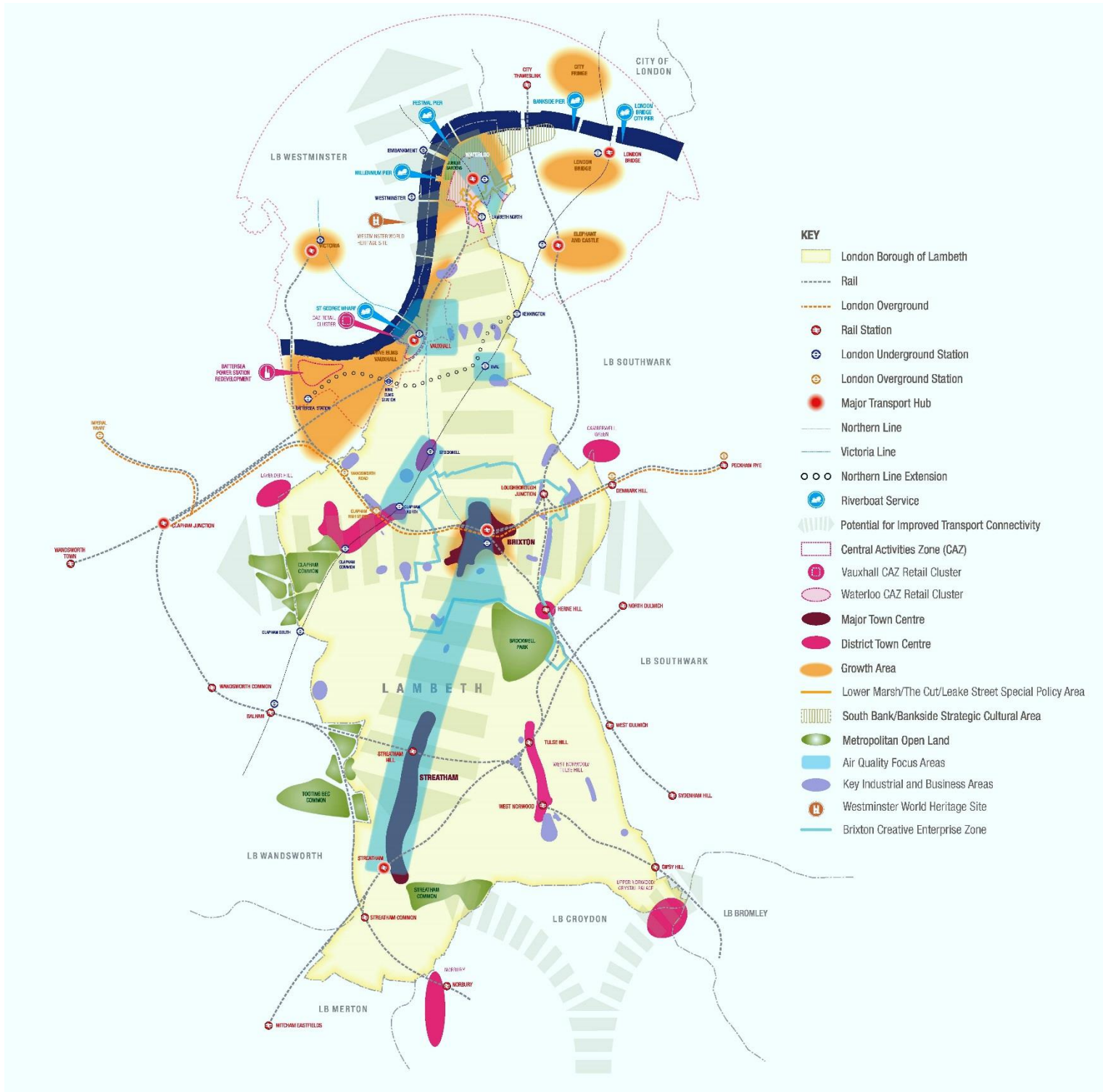
	and sustainable urban drainage, an integrated approach to water management and protection of the supply of water.
D	Providing essential infrastructure
7	Provide the essential physical, social and green infrastructure to support population and economic growth through the co-ordinated delivery of infrastructure programmes.
8	Work in partnership with government, Transport for London, Network Rail and major developers to increase public transport capacity and accessibility, reduce reliance on the private car, promote walking and cycling, and provide alternatives to road-based freight transport.
9	Provide planned additional school places to meet existing and future demand in Lambeth; and support the reconfiguration of further education premises.
10	Contribute to improving health and wellbeing and reducing health inequalities by supporting the reconfiguration and expansion of primary health care, hospital and social care facilities, and by encouraging healthy lifestyles in the design of the built environment.
11	Increase the quality of open space and multi-functional green infrastructure in Lambeth by safeguarding, linking and upgrading existing open space, improving access, retaining existing trees and planting more trees (through delivery of the Lambeth Green Infrastructure Strategy), and seek new open space wherever possible including through an extension to Jubilee Gardens.
12	Contribute to the delivery of Lambeth's Sustainable Waste Management Strategy by maintaining an appropriate supply of land for waste management and operational use and seeking the most effective waste management facilities within new developments.
13	Supporting a low carbon circular economy/circular economy principles that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible.
E	Promoting community cohesion and safe, liveable neighbourhoods
14	Develop and sustain stable neighbourhoods with a high quality, liveable, green, healthy and inclusive residential environment, respect for local amenity, good access to local services and transport, and mixed populations (including different ethnic groups, faiths and sexual orientations, the young, older people and those with disabilities).
15	Increase community safety, including reduction in youth violence and resilience to terrorism by designing out crime and fear of crime in the built environment and through joint working within the Lambeth First (LSP): Safer Lambeth Partnership Executive.
F	Creating and maintaining attractive, distinctive places
16	Create and sustain distinctive local places through excellent design of buildings and the public realm, valuing heritage, identity, cultural assets, the River Thames and the natural environment.
17	Conserve and enhance the historic environment (with a particular focus on addressing Heritage at Risk), the setting and Outstanding Universal Value of the Westminster World Heritage Site and strategic views by working in partnership with Historic England, neighbouring boroughs and community groups.
18	Support the regeneration and renewal of the London Plan Opportunity Areas at Waterloo and Nine Elms Vauxhall to reflect their role in central London, working in close partnership with the neighbouring boroughs of Southwark and Wandsworth and all key stakeholders.
19	Support the delivery of Lambeth's Creative and Digital Industries Strategy, and maintain and develop Lambeth's strength in arts and culture and the role of the South Bank as one of London's leading international cultural and tourist destinations reflecting its status as part of the South Bank/Bankside Strategic Cultural Area.

2.0.6 The spatial framework for future development and land use within the borough is outlined in the spatial strategy and shown in Map 1 below – the DRLLP PSV 2020 Key Diagram. It sets out the broad locations for delivering sustainable development and enhancement, including new housing and other important strategic development needs such as employment, retail, leisure, community, public services, transport as well as mitigating and adapting to the effects of climate change.

Sustainability Appraisal

Draft Revised Lambeth Local Plan Proposed Submission Version January 2020

DRLLP PSV Key Diagram



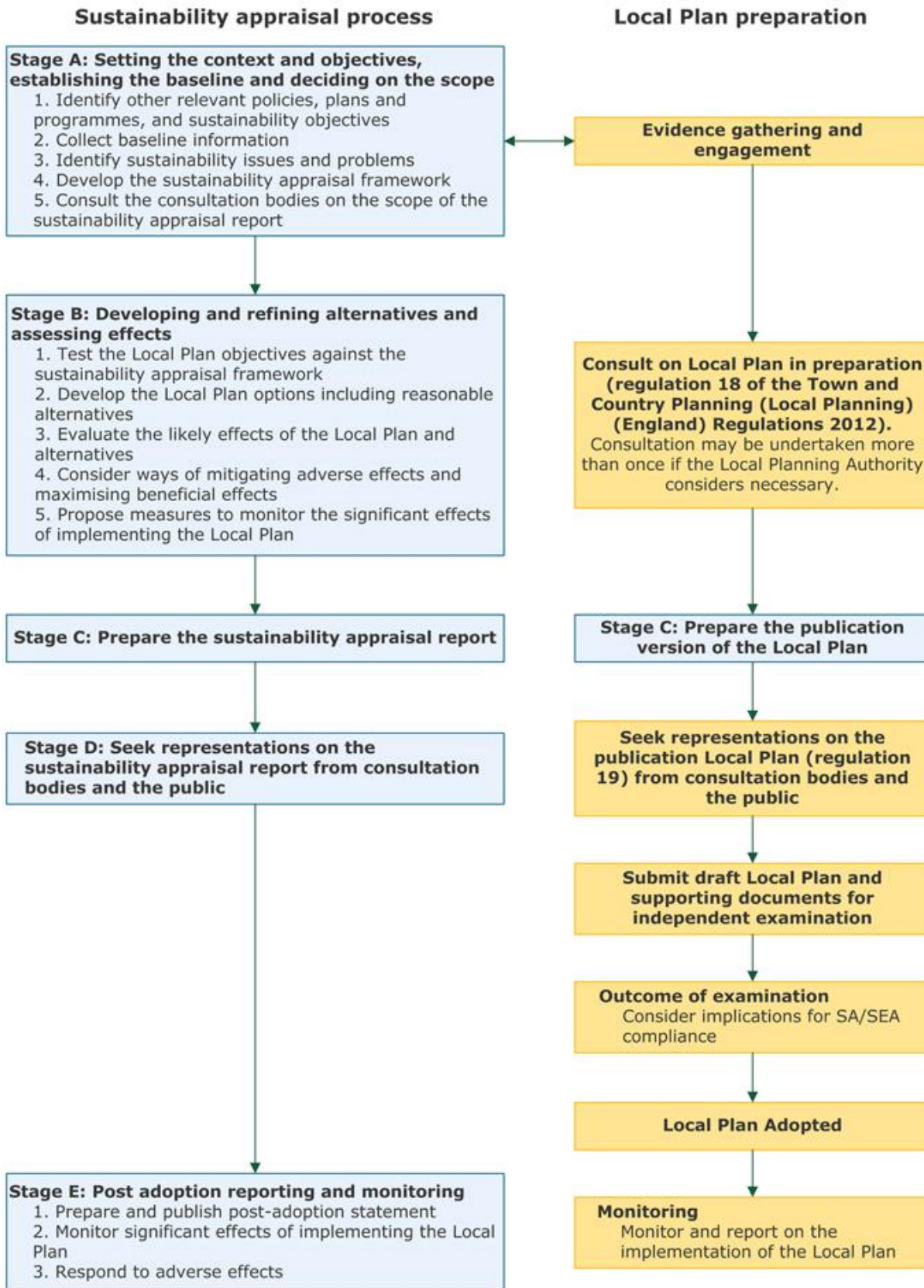
3.0 SA/SEA METHODOLOGY

- 3.0.1 This report presents the sustainability appraisal work on the DRLLP PSV 2020. The SA process assists in determining the impact the revised Local Plan is likely to have on baseline sustainability issues in the borough.
- 3.0.2 The purpose of the SA is not to identify the best option. It is to inform the decision making process, by highlighting the potential implications of pursuing a particular strategy or policy response. The findings of this SA and previous SAs have been considered and incorporated where appropriate into the final version of the DRLLP PSV 2020, thereby making an effective contribution to the provision of 'sustainable development'.
- 3.0.3 This report is the 'Sustainability Appraisal Report' for the purposes of the Town and Country Planning (Local Planning) (England) Regulations 2012 and is one of the submission documents under Regulations 17 and 22. It will be published alongside the DRLLP PSV 2020 from 31st January and 13th March; and it will be submitted to the Secretary of State in April 2020 along with the DRLLP PSV 2020 and any representations made at pre-submission publication. It will then be considered by the examining Inspector alongside the other submission documents.
- 3.0.4 Table 1 below outlines the process of producing a SA report. All of Stage A (Scoping Report October 2016) and Stages B, C and D have been completed previously for iterations of the draft local plan during its plan making process. This SA Report produces final documents for Stage D Pre-Submission Publication as it takes into consideration any changes made to the draft revised Local Plan as a result of the Regulation 18 consultation process.

Table 1: SA process and outputs

FIVE STAGES OF THE SA REPORT	Outcome
SA Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	Scoping Report 2016
SA Stage B: Developing and refining options and assessing effects	SA Issues and Reasonable Alternatives October 2017
SA Stage C: Preparing the Sustainability Appraisal Report	Draft Sustainability Appraisal Report October 2018 SA Draft Revised Lambeth Local Plan Proposed Submission Version January 2020
SA Stage D: Consulting on the reasonable alternatives of the DPD and SA Report	SA Issues and Reasonable Alternatives October 2017 and Draft Sustainability Appraisal Report October 2018 SA Draft Revised Lambeth Local Plan Proposed Submission Version January 2020
SA Stage E: Monitoring the significant effects of implementing the DPD	Post adoption of the Revised Local Plan.

Figure 1: Sustainability appraisal process and local plan preparation



3.1 Relationship to Strategic Environmental Assessment

- 3.1.1 The European Directive 2001/42/EC (SEA) requires that Development Plan Documents be subject to a strategic environmental assessment (SEA). The purpose of the SEA is to consider the likely significant effects of the Plan on the environment including issues such as population, human health, biodiversity, soil, flora, fauna, water, air, climatic factors, material assets, cultural heritage (including archaeological and built heritage) and landscape.
- 3.1.2 The requirements of undertaking a Sustainability Appraisal and a Strategic Environmental Assessment are distinct. The objectives of an SEA focus on the environmental effects, whereas SA is concerned with the full range of environmental, social and economic matters. Whilst this is the case government guidance encourages the two appraisals to be undertaken together and as such, this SA report has been written to meet the requirements of the SEA Directive.
- 3.1.3 Table 2 below sets out the requirements of the SEA Directive and where they are covered in the SA of the DRLLP PSV 2020.

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

Environmental Report requirements	Section of this Report
a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Sections 2, 5* and Scoping Report 2016
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Sections 4 and 5*
c) the environmental characteristics of areas likely to be significantly affected;	Sections 4 and 5*
d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (The Habitats Directive);	Sections 4 and 5*
e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Section 5*
f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 5*
g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 5*
h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 5*
i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 5*
j) a non-technical summary of the information provided under the above headings.	Non-technical Summary (separate report)

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

3.2 Consultation and Approach and Influence of SA to date

- 3.2.1 A draft Scoping Report was made available for comment to statutory consultees Natural England, Environment Agency and Historic England. Consultation was over a five-week period from March to April 2016. The draft Scoping Report provided a summary of the environmental, social and economic conditions in Lambeth (baseline information and the proposed Sustainability Appraisal

Framework). Given that the DRLLP PSV 2020 plan-making process involves only a partial review of some elements of the recently adopted Lambeth Local Plan (2015), the Scoping Report drew upon and further updated previous sustainability appraisal work undertaken through the Lambeth Local Plan 2015 preparation process, including the Sustainability Appraisal Framework. Responses were received from all three statutory consultees (see Appendix 3.3) and their responses were taken into account in updating the final version Scoping Report (2018) which was published alongside the draft SA Report on the Draft Revised Lambeth Local Plan October 2018 (see Appendix 3).

- 3.2.2 Appendix 3.3 sets out the responses that were received on the draft Scoping Report and the action that has been taken as a result.
- 3.2.3 In October 2017 an initial sustainability appraisal was prepared for the Lambeth Local Plan Review Issues and Reasonable Alternatives. The SA assessed each reasonable alternative identified for the local plan issues against the sustainability objectives established through the preparation of the Scoping Report. The main environmental, social and economic implications of each alternative were identified. This initial SA highlighted that not all policy options deliver environmental, social and economic benefits that are equal to one another, and that the true sustainability of each policy option is highly dependent on how the policy is implemented.
- 3.2.4 A SA on the Draft Revised Lambeth Local Plan October 2018 was published for consultation alongside the draft Local Plan for eight weeks from October to December 2018. Four representations received mention the SA (Historic England, Wandsworth Council and two individuals) and where appropriate these comments have been incorporated into this SA (see Appendix 1). The SA prepared on the Draft Revised Lambeth Local Plan October 2018 made 98 recommendations for policies and all of these have been considered in the preparation of the DRLLP PSV 2020. Appendix 1 (Table 2) sets out the schedule of SA recommendations made at that time, along with planning policy response to each recommendation.
- 3.2.5 Recommendations arising from this SA on emerging DRLLP PSV policies have been discussed, considered and, where appropriate, incorporated into policy by the policy team as and when SA recommendations have been identified. This process has helped to produce a more sustainable and complete version of the revised local plan ready for submission. See Appendix 1 (Table 1) for the schedule of SA recommendations made during the preparation of the DRLLP PSV 2020.
- 3.2.6 It is recognised that the council has engaged with adjoining boroughs during the preparation of the DRLLP PSV and discussed cross-boundary issues. Further detail of these discussions can be viewed in the Statements of Common Ground.

3.3 Assumptions and Difficulties encountered

- 3.3.1 The Sustainability Appraisal process provides a useful tool in identifying issues and suggesting possible forms of mitigation to reduce potential adverse effects. It tests the performance and robustness of policies against sustainability objectives. However, there are a number of uncertainties and limitations that exist in the sustainability appraisal process, which are summarised below:
- The principal source of difficulty in undertaking the SA is the reliance on the judgement of predicting and assessing effects. However, the SA has been undertaken by a professional with experience in town planning and sustainability issues. Consultation on draft SA reports adds value to the process through consideration of other 'experts' and interested stakeholders to review the effects identified and provide alternative opinions for further scrutiny.
 - Difficulties have been identified in respect of predicting the impact of the DRLLP PSV 2020 in the long term, which has further complicated the process of accurately appraising the sustainability of the strategy.
 - Difficulties associated with and distinguishing between and separating out the influence of the

DRLLP PSV from other external factors. For example whilst the predicted trends for a particular baseline indicator may suggest that the situation is worsening over time (for example air quality or crime or health statistics); it may be due to various factors beyond the control of the Local Plan; the Local Plan itself may still have a positive influence in so far as planning can influence such areas. Similarly there is uncertainty with regards to the UK leaving the European Union and the economic and social effects that this might present.

- A further difficulty was the identification of *significant* effects, in particular with reference to those sustainability objectives that result from a very broad range of interacting factors (for example health and health inequalities).

3.4 Next Steps

- 3.4.1 This SA report will be published alongside the DRLLP PSV 2020 for a six week period from 31st January to 13th March 2020, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 19. Notification of its availability will be made in accordance with the requirements of the Regulations.

4.0 CHARACTERISATION AND SA FRAMEWORK

- 4.0.1 This section provides a brief profile of Lambeth Borough, including an overview of key environmental, social and economic characteristics. The information provided is drawn largely from the DRLLP PSV 2020 and State of the Borough Report 2016 (which draws upon 2011 Census). More detailed information on the borough is provided as baseline data against the sustainability objectives (see Section 5C).
- 4.0.2 The London Borough of Lambeth covers an area of about ten and a half square miles, including Waterloo and the South Bank, Vauxhall, the Oval, Kennington, Stockwell, Clapham, Brixton, Loughborough Junction, Herne Hill, Streatham, Tulse Hill, West Norwood and Gypsy Hill. Located in the southwest of London, Lambeth has approximately 3.2 kilometres of Thames frontage, and is situated on the southern bank of the Thames neighbouring the boroughs of Southwark, Croydon, and Wandsworth and Merton to the east south and west respectively, and Westminster and the City of London to the north across the Thames. Lambeth is an inner London borough with the north of the borough having a mix of central London activities, while the south of the borough is predominately suburban in character.
- 4.0.3 Lambeth is an area of contrasts. The northern part of the borough features internationally-significant central London activities centred around Waterloo and the South Bank area, including the South Bank Centre, major corporate offices, the London Eye and Oval Cricket Ground. Heading south this area gives way to the eclectic centres of Brixton and Clapham with their unique blend of entertainment, speciality retail and cultural industries, surrounded by a culturally-diverse residential population. Further south again are the suburbs of Streatham and Norwood which also feature locally important town centres. With no strategic industrial locations in Lambeth, locally significant sites known as Key Industrial Business Areas (KIBAs) are protected for specific industrial, business and waste management uses. There are 28 existing KIBAs scattered across the borough which cover a total area of approximately 48 hectares. (The DRLLP PSV 2020 proposes changes to existing KIBAs and also proposes to designate four new KIBAs. If adopted, this will result in 31 KIBAs in Lambeth, covering approximately 47 hectares.)
- 4.0.4 The borough has an important historic environment with 62 Conservation Areas covering approximately 30 per cent of the borough including circa 2,500 listed buildings, the vast majority of which are nineteenth century residential dwellings. There are also 17 Archaeological Priority Zones and eight historic Registered Parks and Gardens as well as protected strategic views in the north of the borough of St Pauls Cathedral and the Palace of Westminster which is a World Heritage site.
- 4.0.5 Lambeth is a very diverse borough ethnically, culturally, socially and economically and this diversity is constantly evolving. It is among the most densely populated local authority in England, with over 11,300 people per square kilometre. Nearly a third of a million people live in Lambeth – at least 318,000 (SOB2016). It has a complex social and ethnic mix, with large African and Portuguese populations, and is an important focus for the UK black Caribbean population. The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. Lambeth is the 8th most deprived borough in London and 22nd most deprived in England. This is an improved relative position since 2010 when Lambeth was ranked as the 14th most deprived authority in England. The most deprived areas are spread throughout the borough but are particularly concentrated in Coldharbour and Vassall wards in Brixton and in parts of Knight's Hill ward, in the south of the borough.

- 4.0.6 Lambeth is an important part of the London economy, which has experienced growth more strongly than the rest of the UK as a whole. The north of Lambeth is an integral part of London's Central Activities Zone (CAZ), home to significant employers and cultural and tourism assets. Further south are a series of important town centres including Brixton, Clapham, Streatham and West Norwood/Tulse Hill. As well as being an important employment location, Lambeth makes a crucial contribution to London's economy as a place where young, highly skilled people live – over 45 per cent of residents are educated to degree level which is comparable with many inner London boroughs (SOB report 2016). The biggest sectors for employment within Lambeth are human health and social work and administrative and support services. Residents are more likely to be in employment than the London average. Unemployment has fallen dramatically in Lambeth since 2010 and is lower than both the London and national rate. There are 11,500 residents who are unemployed; and social housing tenants, BME residents and residents aged over 50 are more likely to be unemployed than other residents (Lambeth Investment and Opportunity Strategy 2015).
- 4.0.7 Lambeth is facing a period of unprecedented opportunity, and many residents have benefited from the economic recovery through rising asset prices and a strong labour market. However, there were 7,525 working age residents claiming benefits principally for the reason of being unemployed in Lambeth in November 2018 (ONS Claimant Court). By far the largest group of out-of-work benefits claimants are claiming for health reasons, with 12,350 people claiming for Incapacity Benefits in November 2016 (DWP Benefit Claimants – working age group).
- 4.0.8 Lambeth has a relatively young age profile. Although it is a largely residential borough, it is a destination for young working age people, rather than families (SOB 2016). The male and female populations have different age profiles. The young working age population is roughly even between males and females. For all ages over 50, there are slightly more females than males. This reflects national trends.
- 4.0.9 If trends continue, Lambeth's population is projected to grow by just over 1% per year for the next five years, and just under 1% for the five years after that. The borough will continue to have a majority of young working age people (20-44). Although the UK population's older population is projected to increase, this will affect Lambeth less than places which are destinations for older people. Lambeth's population aged 60+ is projected to grow by a quarter in the next 10 years, compared to a 10% growth across the whole population. There are substantial differences between ethnic groups. For example, the black Caribbean 60+ population is projected to grow by almost 40%. Similarly, the older black African population, which is currently small, is projected to nearly double. The older white population, which is larger, is projected to grow by about 12% (SOB 2016).
- 4.0.10 Although Lambeth is a largely residential borough with many long term residents, the proportion of people moving in and out of the borough is high, similar to many places in inner London. Approximately 12% of the population leave each year and are replaced by around 12% new arrivals. In other words, around 88% of the population each year remains the same (SOB 2016).
- 4.0.11 The number of households in the borough is projected to grow from 143,655 in 2016 to 172,649 in 2036 (Lambeth SHMA). Current household composition includes a high proportion of lone parent households with dependent children. One person households, in particular, are projected to increase.

- 4.0.12 Around 40% of Lambeth's population is white with a UK background. White people make up 55% of the population. Around 40% of Lambeth residents are White British or Irish, in line with inner London (43%). 15% of the population are from other White backgrounds – around 47,000 people. About two thirds of these people are from Europe outside the UK & Ireland, 8% are from central and south America, 4% from North America and the Caribbean, and 8% from Australasia (SOB 2016).
- 4.0.13 Black people make up around a third of the population (30.4%). Lambeth's largest non-white ethnic group is black African (11.5%), followed by black Caribbean (8.8%). Lambeth has the joint second largest proportion of black Caribbean people in London after Lewisham (10.7%) and Croydon (8.8%) (SOB 2016). Lambeth has a small Asian population compared to many places in London. Only 8.4% of Lambeth residents are from Asian backgrounds (including Chinese), much less than the inner London average (21%). Around 150 different languages are spoken in families in the borough. Around 17,000 people (6% of the population) speak a main language other than English, mostly EU and African languages (SOB 2016).
- 4.0.14 Regional data suggests that around 3.5% of people in London are Lesbian Gay Bisexual and Transgender (LGBT). Recent health estimates suggest that Lambeth has one of the largest populations of gay men in the UK (SOB 2016).
- 4.0.15 Over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest group of residents with a religion (SOB 2016).
- 4.0.16 About 37,000 people in Lambeth have their day-to-day activities limited by a long term illness or disability. About 60% of people with a limiting health condition are aged over 50 (SOB 2016).
- 4.0.17 There are an estimated 49,000 people in poverty in Lambeth before housing costs, and 87,000 people in poverty after housing costs. A third of working age people and a quarter of people of retirement age in Lambeth are living in poverty. However, Lambeth is not one of London's most impoverished boroughs.
- 4.0.18 Public transport infrastructure in the Borough is generally good for people without disabilities, but less good for people with disabilities or access needs, with the exception of bus services in the borough for which the majority are fully accessible. There are 14 railway stations evenly spread throughout the borough and nine underground stations predominantly in the north. The extension of the Northern underground line extension to Battersea is under construction, which will see a new station opened at Nine Elms in 2020. Accessibility at Lambeth's train stations is graded as poor at 8 of the 14 stations and of the nine underground stations, only Brixton and Vauxhall are fully step free along with the Jubilee line at Waterloo (Lambeth Transport Strategy 2019). During peak periods rail services in Lambeth are currently at or over capacity, particularly services from Clapham Junction to Waterloo and Herne Hill to Victoria (Lambeth Transport Strategy Baseline Report 2017). Investment is needed to improve conditions for passengers, to provide full access to all stations and to enable the planned increases in resident and working population.
- 4.0.19 There are many bus routes with major interchanges at Waterloo, Vauxhall and Brixton. Public transport accessibility is good in north and central Lambeth. However, residents in Streatham and Norwood are without direct access to the underground and are dependent on rail and bus connections. With bus routes focussed on the main north-south radial routes into central London and a lack of east-west services, some areas of the borough continue to have low levels of

accessibility compared to the rest of Lambeth.

4.0.20 The proportion of households with no car or van increased from 51 per cent in 2001 to 58 per cent in 2011 (Census data ONS). Traffic congestion is an issue that is prevalent in parts of the borough. Average bus speeds have suffered in recent years due to congestion and in some parts of the borough there are problems with 'rat running' where drivers cut through residential areas to avoid congestion on main roads (Lambeth Transport Strategy 2019).

4.0.21 The diverse character of Lambeth Borough has given rise to a number of complex spatial issues that have been addressed in the DRLLP PSV 2020 (Table 3).

Table 3: Key Sustainability Issues in Lambeth Borough

Lambeth key issue	London key issue (Taken from IIA of London Plan (Nov 2017))	Notes – KEY ISSUE SUMMARY
Increase the overall supply and mix of housing , including affordable housing. Capacity for conversions.	Lack of affordable housing; Under-supply of homes which meet the needs of Londoners (size, type, tenure); High level of approvals, low level of completions; Increasing costs of housing relative to wages; Homelessness; Implications from major Government reforms to housing legislation and policy	Access to good housing; Affordable housing; Sustainable housing; Housing mix, types, tenures.
Conserve, protect and enhance heritage assets , their settings and the wider historic environment as part of reinforcing local distinctiveness and place-making	Heritage assets at risk from neglect, decay, inappropriate development and air pollution; Views and vistas to heritage assets are at risk from increased development pressures; Potential harm to the significance of heritage assets and wider historic environment through inappropriate development.	Built heritage; Views and vistas.
Provide the essential infrastructure to support population growth.	Significant increase in the population; Young profile; Ageing and more diverse population; Uncertainty of the composition of the population, including migration patterns; Insufficient school places to meet growing needs; Increased pressure on London's infrastructure as a result of growth and increased economic activity; Lack of high speed and efficient connectivity (digital) across all parts of London; Need to improve sewer and wastewater infrastructure capacity	Infrastructure provision, including healthcare services and facilities; digital connectivity and schools.
Develop mixed, cohesive, safe communities accessible to all.	Increasing aging and diverse population;	Mixed communities; Cohesive communities;

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Lambeth key issue	London key issue (Taken from IIA of London Plan (Nov 2017))	Notes – KEY ISSUE SUMMARY
	<p>Persistent causes of Multiple Deprivation High levels of poverty in some parts of London, with rates of child poverty continuing to exceed national levels; Discrimination; Isolation; Population churn and impact on community cohesion; Gentrification; Increased threat of major incidents and unplanned events; Perceptions of lack of safety; Fear of crime creating barrier to activities leading to increased social isolation; Vulnerability of different groups of people at greater risk of crime; More vibrant night-time economy leading to increased risk of crime</p>	<p>Safe communities; Accessible communities; Meeting the needs of diverse communities; Addressing social inequities; Tackling crime; Tackling terrorism; Addressing fear of crime.</p>
<p>Provide good access to local services and community facilities within neighbourhoods.</p> <p>Increase public transport accessibility and promote walking and cycling.</p>	<p>Poor orbital connectivity by all modes of public transport in outer London; Poor connectivity across the River Thames in east London; Reduced transport connectivity across London as a result of congestion and overcrowding on services and roads; Reduced connectivity across London by walking as a result of congestion and overcrowding on pavements and footpaths; Increasing airport capacity will impact on the spatial and economic fabric of the city; Barriers to using public transport; Poor design of the built environment; Loss of pubs, cinemas, creative workspace, live music and other cultural facilities and risk of harm to heritage assets; Inequality in access to cultural venues</p>	<p>Good local access to services and facilities; Tackling congestion; Increase public transport use, accessibility and provision, cycling and walking.</p>
<p>Increase the number and variety of jobs in the local economy, including local jobs for local people.</p>	<p>Disparities between rates of employment among London’s residents; Disparity between wages and cost of living; Lack of diversity in jobs provided; Growth of low paid employment and zero hours contracts; Lack of support for transition from education to work, especially for young women; Large variations in educational performance across London</p>	<p>Increasing jobs, particularly local jobs for local people; Addressing high rates of child poverty; Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups; Tackling barriers to employment; London’s role in the UK economy.</p>

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Lambeth key issue	London key issue (Taken from IIA of London Plan (Nov 2017))	Notes – KEY ISSUE SUMMARY
<p>Support the growth of key economic sectors through new business development, business retention and inward investment.</p>	<p>Changing global economy; London's Productivity; Potential loss of agglomeration benefits; Increased pressure on London's infrastructure as a result of growth and increased economic activity; Risk that infrastructure could constrain economic growth; Lack of high speed and efficient connectivity (digital) across all parts of London; Loss of employment land as a result of increased pressure for housing; Insufficient amount of floorspace available to meet identified needs; Affordability of business space, particularly for small and medium sized enterprises and start-ups</p>	<p>New business development; Business retention; Inward investment; Digital connectivity Targeting key economic sectors.</p>
<p>Create viable, safe and well managed town centres:</p> <ul style="list-style-type: none"> ▪ Brixton ▪ Streatham ▪ Clapham ▪ Stockwell ▪ West Norwood / Tulse Hill <p>Support the regeneration of Vauxhall and Waterloo Opportunity Areas</p>	<p>Impact of mixed use development – night-time economy and residents; Impact on town centres as a result of a reduction in demand for retail floorspace; Poor quality public realm in some parts of London which can discourage active travel; Risk of poor design, harm to the distinctive character of places lack of legible neighbourhoods and sense of place</p>	<p>Viable, safe and well managed town centres.</p>
<p>Support the regeneration and renewal of London Plan Opportunity Areas.</p>	<p>Development and Regeneration. The sustainable development and regeneration of London, including addressing areas of deprivation. The Opportunity and Intensification Areas offer significant potential for sustainable development to meet London's housing and employment needs.</p>	<p>Regeneration of London Plan Opportunity Areas.</p>
<p>Reduce carbon emissions from residents, businesses, public services and buildings.</p> <p>Implement measures to help Lambeth adapt to the consequences of inevitable climate change, including flood risk management</p>	<p>London is not currently meeting the Mayor's CO₂ emission target; Transport will continue to contribute significantly to CO₂ emissions; CO₂ emissions from buildings continue to rise; London is no longer a global leader in terms of transitioning towards a low carbon economy; Increase in extreme weather events such as flood risk, drought and heat risk and associated impacts; Changing demographics such as an ageing population and more under five year olds</p>	<p>Reducing CO₂ emissions.</p> <p>Climate change adaptation, including flood risk management</p>

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Lambeth key issue	London key issue (Taken from IIA of London Plan (Nov 2017))	Notes – KEY ISSUE SUMMARY
	<p>increasing the number of potentially vulnerable people; Design of building causes a larger variation in temperature exposure than the Urban Heat Island (UHI) effect; Risk of flooding to property and people from river, surface water, tidal, sewer, ground water and reservoir; Increase in run-off and potential contamination and disruption of flows; Necessary infrastructure needs to be planned for, funded and implemented to support growth and development</p>	
<p>Maximise the efficient use and management of resources, including water, energy and waste.</p>	<p>Inability for London to accommodate required growth within its boundaries; Unsustainable patterns of development within and across London's boundaries; Higher densities development; Competing pressures for land impacts on ability to provide social, physical and environmental infrastructure; Non-efficient use of land; Integration of land use and transport; Spatial impact and consequential development pressures resulting from decision on London's future airport capacity; Relatively high and ineffective use of fossil fuels contributing towards London's GHG emissions and air pollution; Insufficient low carbon energy supply; High number of Londoners in fuel poverty. Energy-inefficient building stock & transport; Un-utilised local energy resources; Need to manage peak electricity demand Need to reduce per capita water consumption; Need to plan for and deliver additional new water resources; Need to improve the quality of water in London's waterbodies; Need to improve the physical form of London's waterbodies; Need to improve sewer and wastewater infrastructure capacity; Increasing pressure on waste sites and infrastructure including wharves in London to meet</p>	<p>Efficient use and management of resources; Efficient use and management of water: addressing increasing demand; Efficient use and management of energy; Efficient use and management of waste: increasing recycling rates and self-sufficiency in waste disposal; Pressure on biodiversity and open spaces.</p>

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Lambeth key issue	London key issue (Taken from IIA of London Plan (Nov 2017))	Notes – KEY ISSUE SUMMARY
	<p>demand; Wasteful economy increasing disposal costs and climate change impact; Low municipal waste recycling rate and inconsistent recycling service provision falling short of stretching recycling targets; Fragmented waste governance resulting in inconsistent recycling service provision and performance across London; Likely increase in waste arisings in particularly construction materials to meet the needs of London's growing population; Threat to London's geodiversity as a result of increased demand for development; Modifications to the landscape and subsequently geomorphological processes; Remediation of contaminated land</p>	
<p>Health and well-being, including air quality</p>	<p>Increasing health inequalities across the population; Londoners are living with complex health needs for longer period; Increasing and changing pressure on the health services and service provision; Differentials in life expectancy and healthy life expectancy across London; Widening social inequalities; Low levels of physical activity and increasing obesity levels across the population; High levels of NO_x, PM₁₀ and PM_{2.5} emissions from road transport; Little to no predicted reduction in PM₁₀ and PM_{2.5} emissions from road transport between 2013 and 2030; London is not compliant with legal limit values for NO₂; Large numbers of the population are exposed to levels of NO₂ above the EU limit value; Exposure to poor air quality is unequal across London and some areas are more exposed to poor air quality than others; The health impacts of air pollution include: an increased risk of early death as well as whole-life impacts on lung function, lung health and increased susceptibility to cardiovascular diseases, respiratory cancer, stroke, asthma and COPD;</p>	<p>Improving air quality (and meeting EU targets); Addressing health inequalities and the health needs of Lambeth's existing and new residents.</p>

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Lambeth key issue	London key issue (Taken from IIA of London Plan (Nov 2017))	Notes – KEY ISSUE SUMMARY
	<p>Parts of the population are exposed to roadside and railway noise that exceeds the threshold;</p> <p>Increasing noise levels from night-time economy, freight movement and deliveries associated with mixed use development;</p> <p>Lack of quiet and tranquil places for relaxation and enjoyment.</p>	
Biodiversity, open space and green infrastructure	<p>Loss of biodiversity and reduced ecological resilience as a result of increased pressure for development and intensification of existing development;</p> <p>Decrease in Areas of Deficiency in Access to Nature and increased recreational pressure on existing habitats and green spaces;</p> <p>Deficiencies in open spaces in some parts of the city;</p> <p>Impact of climate change and threat of new pests and diseases;</p> <p>Poor connectivity to green infrastructure for all</p>	<p>Protect and enhance existing open spaces, biodiversity and green infrastructure;</p> <p>Increase amount of open space and green infrastructure.</p>

4.1 SA Framework

4.1.1 The SA Framework is shown in Table 4 below, alongside appraisal prompt questions and targets. The SA Framework was developed in the Scoping Report and was updated in response to consultation comments received (Appendix 3.3). This SA Framework has been used to test the spatial strategy and vision, strategic objectives and policies for the DRLLP PSV 2020.

4.2 Tensions between SA Objectives

4.2.1 While each of the below objectives seeks to achieve sustainability in their own right, inevitably it is considered that inherent tensions arise between sustainability objectives seeking to improve economic and social conditions (in other words developmental objectives) and those seeking to protect or improve the natural environment (protective objectives). For example, achievement of Objectives 16 to 19 (economic stimulation) may result in potential tensions with objectives 10 to 15 (environmental protection). However the nature of sustainable development requires a holistic overall judgement of activities and assessment of effects.

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

Table 4: Sustainability Objectives

SA Objective	Appraisal prompt questions and targets	SEA topic requirement
SOCIAL		
<p>1. Crime and safety. Ensuring safe communities with reduced crime and disorder.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • reduce the opportunities to commit crime and engage in antisocial behaviour? • help address the fear of crime as well as crime itself? • create the conditions for communities to develop which will support a reduction in crime and the fear of crime? • reduce Lambeth's vulnerability to major challenges such as climate change and water shortages? • reduce Lambeth's vulnerability to terrorist action? • reduce the need for motorised travel? • encourage walking and cycling, for instance by reducing traffic accidents to pedestrians and cyclists? 	Population
<p>2. Health and well being. Promote a healthy borough, by reducing health inequalities and the causes of ill health.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • protect health and wellbeing? • reduce poverty, including child poverty and the impact of income inequality? • help reduce health inequalities? • help improve mental, emotional and physical health, and wellbeing? • encourage the development of healthy neighbourhoods? • make walking and cycling more attractive relative to other alternatives? • improve access to health care services? • help people be healthier, for longer • help people to live an inclusive and active lifestyle? • promote a sense of wellbeing? 	Population, Human Health
<p>3. Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • Improve access (including through ICT) for all residents to services, jobs, leisure and amenities near home, reducing the need to travel? Including: <ul style="list-style-type: none"> • Schools • Nurseries • GPs and hospitals • Libraries • Places of worship • Food shops (especially those selling fresh, healthy food) • Community centres • Children's play areas • Sports and recreation facilities 	Population, Human Health

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	<ul style="list-style-type: none"> • Open spaces and wildlife habitats • Police and emergency services • Banking facilities and post offices • help older, disabled and vulnerable people live independently and have control over their lives? • help vulnerable children and adults get support and protection? 	
4. Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • Ensure that appropriate infrastructure keeps pace with population growth, in particular: <ul style="list-style-type: none"> ○ water and sewerage infrastructure ○ health 'infrastructure' (facilities and services) ○ schools ○ green infrastructure ○ flood defences ○ transport. 	Population, Human Health, Material Assets
5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • promote a culture of equity, fairness and respect for people and the environment? • improve environmental conditions for Lambeth's deprived areas and deprived communities? • reduce poverty and social exclusion? • Remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination? • promote social cohesion within and between population groups? • enable social integration between minority groups and wider society? • address housing, cultural, social and employment needs of those with protected characteristics? • promote adequate accessibility, in particular for older and disabled people? 	Population, Human Health
6. Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • increase access to good housing? • promote increased supply of housing? • Increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)? • meet affordable housing targets? • meet sustainable housing standards? <ul style="list-style-type: none"> • increase the mix and type of housing, including family units?. • reduce actual noise levels and disturbances from noise? • tackle homelessness and overcrowding? • provide housing that ensures a good standard of living and promotes a healthy lifestyle? • provide Lambeth residents with more opportunities for better quality homes? 	Population, Human Health, material Assets
7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • protect and enhance the quality and quantity of open space and the public realm? • reduce the proportion of the public realm where noise precludes conversation or where other environmental factors (e.g. fumes) make it unpleasant to be? 	Population, Human Health, Material Assets, Landscape,

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<p>promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.</p>	<ul style="list-style-type: none"> • promote community engagement? • promote interactions between different sectors of the community? • promote good governance? • promote wellbeing and help to make people feel positive about the area where they live? • promote child-friendly buildings and places? • promote Lambeth as a place that people want to put down roots rather than just pass through? • support the provision of quality, affordable and healthy food? • help all Lambeth communities feel they are valued and are part of their neighbourhoods? • encourage people to take greater responsibility for their neighbourhood? • help people lead environmentally sustainable lives? 	<p>Cultural Heritage (including architectural and archaeological heritage)</p>
ENVIRONMENTAL		
<p>8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and historic assets.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • protect, conserve and enhance sites, features and areas of historical, archaeological and cultural value/potential and their settings? • enhance the provision of cultural facilities (e.g. public art) and possibilities for cultural events/activities (e.g. festivals)? • respect visual amenity and the spatial diversity of communities? • aspire to a range of buildings and architecture that reflect the cultural diversity of the borough? • protect and enhance the townscape/cityscape character, including historical, archaeological and cultural value/potential and its contribution to local distinctiveness? • increase access to, enjoyment of and understanding of, historical, archaeological and cultural sites, features and areas? • protect, enhance or create open space? • protect valued views? • identify locations where tall building are acceptable? 	<p>Landscape, Cultural Heritage (including architectural and archaeological heritage)</p>
<p>9. Transport and travel. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • reduce overall need for people to travel by improving their access to local services, jobs, leisure and amenities. • encourage a modal shift to more sustainable forms of travel: walking, cycling and public transport as well as encourage efficiency (e.g through car sharing)? • encourage greater efficiency in the transport network, such as through higher load factors? • integrate new development, especially residential development, with sustainable transport choices? • improve accessibility to work by public transport, walking and cycling? • reduce road traffic accidents, especially involving cyclists? 	<p>Population</p>
<p>10. Biodiversity. To protect, enhance and promote biodiversity, and to bring nature closer to people.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife (in particular will it avoid harm to national, London or Lambeth priority species and designated sites)? 	<p>Biodiversity, Flora, Fauna, Landscape, Soil, Water</p>

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	<ul style="list-style-type: none"> • Improve the quality and extent of designated and non-designated sites? • protect and enhance access to open space and improve the quality of publicly accessible green space? • increase and enhance the resilience of Lambeth's key priority habitats and species in line with its Biodiversity Action Plan's long term vision and objectives? • encourage replacement of valuable lost habitat? • bring nature closer to people, i.e. help conserve local nature conservation amenity, including gardens? • provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)? • Improve access to areas of biodiversity interest? • Enhance the ecological function and carrying capacity of the green space network? • Promote a network of green infrastructure? 	
11. Green infrastructure. To create, manage and enhance green infrastructure.	<ul style="list-style-type: none"> • protect existing green infrastructure or open spaces? • enhance/create good quality and accessible green infrastructure or open spaces? • promote increased access to green infrastructure where appropriate 	Biodiversity, Flora, Fauna, Landscape, Soil, Water, Climatic Factors
12. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • help minimise emissions of greenhouse gases? • increase the proportion of energy both produced and used from renewable and sustainable resources? • reduce demand and need for energy? • reduce the impacts of climate change? e.g. urban heat island effect, flooding and drought? • ensure adaptation to the future impacts of climate change? • help new and retrofitted development and infrastructure is located, designed and constructed to withstand the effects of climate change over its design life? • promote high quality, appropriate design and sustainable construction methods? • promote high standards of energy and environmental performance for new and existing buildings? • minimise embedded carbon in new buildings and development? 	Climatic Factors, Materials Assets
13. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve the quality of water and waterbodies (surface and groundwater)? • reduce piped water consumption e.g. through reducing demand and encouraging recycling in households? • reduce waste water and sewage needing processing? • support sustainable urban drainage? • minimise the risk of all types of flooding (tidal, fluvial, surface water and sewerage) to people and property and manage flood risks appropriately both now and in the long-term? 	Water, Climatic Factors
14. Waste. Ensure that Lambeth manages its	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • minimise the production of waste, maximise recycling and reuse during construction, and decrease the demand 	Population, Material Assets

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waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<p>for raw materials from unsustainable sources e.g. through reusing demolition material onsite and using products made from recycled materials?</p> <ul style="list-style-type: none"> • make waste avoidance, reuse and recycling easy for residents and visitors? • help develop markets for recycled products by using them? • enable safe storage of waste and recycling, convenient for both residents and collectors? • make appropriate provision for waste management facilities in the Borough to help meet the London Plan apportionment and self sufficiency targets? 	
15. Air quality. To improve air quality.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve air quality? • reduce emissions of greenhouse gases? • reduce emissions of PM10, NO2 and ozone depleting substances? • help to achieve national and international standards for air quality (e.g. those set out in the Air Quality Regulations 2010) as well as local air quality management targets? • support the planting of trees? • promote the 'transport hierarchy'? 	Air, Human Health
ECONOMIC		
16. Education and skills. To maximise the education and skills levels of the population.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve opportunities and facilities for formal, informal and vocational learning (including volunteering) for all ages? • contribute to up-skilling and to meeting skills shortages? • promote healthy, sustainable living? • Provide people with the skills to find work? 	Population, Material Assets, Human Health
<p>17. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.</p> <p>This should also support the development of an efficient, low carbon economy (including new green technologies) that minimise unsustainable resource use.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve the resilience of business and the economy e.g. through supporting local business, diversification, corporate social responsibility, accommodating low income workers, supporting and driving the marketplace? • support employment opportunities in the most deprived areas and groups and stimulate regeneration? • enable people to live better for a given income by reducing their need for paid goods and services? • contribute to sustainable tourism? • support development of green industries and a low carbon economy? • support and prevent loss of local businesses? • encourage business start-ups and support the growth of businesses? • Help Lambeth play a strong role in London's economy? 	Population, Material Assets
18. Regeneration and	Will the strategy/policy...	Material Assets,

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<p>efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings, taking into account constraints such as contaminated land.</p>	<ul style="list-style-type: none"> • have benefits to the most deprived areas and communities? • help make people feel positive about the area they live in? • help reduce the number of vacant and derelict buildings? • make best use of scarce land resources and reuse brownfield sites? • promote the efficient, innovative and multifunctional use of land? • ensure the provision of adequate quantities and type of public realm? • protect the Borough's soil resource? 	<p>Soil</p>
<p>19. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve accessibility to employment, especially for local people? • improve employment opportunities among Black, Asian, Ethnic and Minority groups? • protect local employment land and uses? • provide additional housing near places of work? • Help people achieve financial security? • Help all young people have opportunities to achieve their ambitions 	<p>Population, Material Assets</p>

5. LIKELY SIGNIFICANT EFFECTS OF THE DRAFT REVISED LAMBETH LOCAL PLAN PROPOSED SUBMISSION VERSION JANUARY 2020

5.0.1 This section sets out the likely significant effects, both positive and negative, identified in the appraisal work on the DRLLP PSV 2020 objectives, policies and reasonable alternatives.

5.0.2 The SEA Directive states:

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

Assessing significance

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

5A DRAFT REVISED LAMBETH LOCAL PLAN PROPOSED SUBMISSION VERSION OBJECTIVES APPRAISAL

5A.1 The strategic objectives set out how the DRLLP PSV 2020 vision will be delivered. These strategic objectives underpin the more detailed Draft Revised Lambeth Local Plan Proposed Submission Version policies; therefore it is necessary to appraise the Local Plan objectives for compatibility with the SA objectives. The DRLLP PSV 2020 objectives remain largely unchanged from the adopted Lambeth Local Plan 2015, save for some updating. Therefore, while the objectives will be appraised in this SA (for the purpose of completeness), it is not expected that the appraisal results for objectives will differ much from the SA undertaken in October 2013 on the submission version Lambeth Local Plan. Assessing the relationship between SA objectives and the high level strategic objectives helps identify whether the spatial vision for Lambeth is in accordance with sustainability principles. The results of the assessment are presented in Table 5 (next page).

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

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Table 5: Compatibility of Draft Revised Lambeth Local Plan Proposed Submission Version Objectives and SA Objectives

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

5A.2 As expected (given the objectives had previously been appraised as part of the Lambeth Local Plan 2015 SA process), the strategic objectives of the DRLLP PSV 2020 are generally compatible with sustainability principles. Table 5 shows that in general the objectives underpinning the DRLLP PSV 2020 vision are either compatible or have no relation to the Sustainability Appraisal framework (refer to the DRLLP PSV 2020 for the objectives in full). Possible areas of incompatibility and/or uncertainty concern the location of new waste management facilities and their impact on housing and the local economy. Given the highly urban residential nature of the borough, it may be a challenge to locate waste facilities in places that do not impact in some degree on residential areas. In addition, given the competition for land, maintaining land for waste management facilities could compete with the need for housing land and land for economic development. Other uncertainties arise mostly in relation to development oriented objectives and their impact on the environmental sustainability objectives. Their impact on environmental sustainability will be dependent on implementation and measures that seek to avoid or mitigate impacts. The notes below explain the uncertainties (identified by numbers):

1, 6: As briefly outlined above some sites used for waste management and operational use are within or close to largely residential areas and accordingly effects arising from this operation (such as heavy lorry vehicle use, noise, odour) will need to be carefully managed to respect local amenity and mental, emotional and physical wellbeing of residents. Development Plan policies should seek to mitigate and manage effects. Not all waste management activities have such adverse effects on residential amenity.

2-3: Delivery of the 13,350 additional dwellings (minimum) to 2028/29 will need to be located in areas that are accessible to services, jobs, leisure and amenities with appropriate provision of infrastructure to support this growth. Other objectives seek to ensure this is addressed.

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

7-9: Accommodating 13,350 additional homes together with necessary infrastructure to support the resultant population growth will likely produce additional pressures on the built and historic environment, both in terms of increased demand for accessibility to historic assets and sites, and in terms of development pressure for land for other uses such as housing, infrastructure or waste.

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

12-19, 40: Development pressures for different land-uses including housing, schools, waste sites and regeneration schemes have potential to threaten biodiversity, open spaces and green infrastructure including gardens. Accordingly potential adverse effects should be avoided or mitigated and the Lambeth

Biodiversity Action Plan and Lambeth Green Infrastructure Strategy should be used to guide and inform decisions for activities and redevelopment.

20 – 24: Growth and development will likely increase carbon emissions. Therefore such development needs to be sustainably designed and constructed to minimise carbon emissions as far as practicable. Development Plan policies should provide further detail on managing and reducing emissions.

25-38, 42: Similar to the above points; development and economic growth in the borough is likely to have some impact on air quality and natural resources such as soil, land, ecosystems and water. However, it is considered that with adequate policies, these aspects of the natural environment can be managed efficiently taking into account the expected growth assigned to the borough under the draft London Plan.

39, 41: Maintaining an appropriate supply of land for waste management could potentially restrict the borough's ability to create prosperity and business growth; however it can also provide opportunity to progress green industries related to waste management. Similarly, competing demands for land will raise questions on whether sites safeguarded for future waste management use only would be an efficient use of land which promotes efficient, innovative and multifunctional use of land. However, Lambeth also has a planning responsibility to ensure there is sufficient waste management capacity to meet the borough's identified waste needs.

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

5A.3 Given the policy approach for the DRLLP PSV 2020 objectives remains largely unchanged from the Lambeth Local Plan 2015 (that was subject to sustainability appraisals in its formulation); no further recommendations are necessary nor made in this report in relation to the DRLLP PSV 2020 objectives.

5B SPATIAL STRATEGY AND REASONABLE ALTERNATIVES

Spatial Strategy and Strategic Objectives

- 5B.1 Given that the spatial strategy and strategic objectives prepared for the Core Strategy and carried through to the Lambeth Local Plan 2015 remain largely unchanged in the DRLLP PSV 2020, consideration of the issues and options explored for the Core Strategy spatial strategy and strategic objectives remains relevant background information. The Issues and Options Report 2008 prepared for the Core Strategy presented a number of options and reasonable alternatives to the spatial strategy to be pursued, including options for housing, flat conversions, employment, waste management and tall buildings. Further detail of this process, including a summary of the SA results of the broad strategic options can be found on the Local Plan Review Sustainability Appraisal online page as Appendix 5 and the full Report (Appendix 6).
- 5B.2 As the spatial strategy, vision and objectives remain largely unchanged from the adopted Lambeth Local Plan 2015; the commentary and analysis, including appendices, set out in the 'Sustainability Appraisal Lambeth Local Plan Proposed Submission Oct 2013' relating to reasonable alternatives of the spatial strategy and objectives remains relevant. Accordingly the work is not repeated in this SA on the DRLLP PSV 2020 and nor has any additional work been done on them. The final SA and SEA of the Lambeth Local Plan Proposed Submission 2013 has been reviewed in the preparation of this SA and is available on the Local Plan Review Sustainability Appraisal page online (Appendix 4), as is the Sustainability Adoption Statement (Appendix 7).

Reasonable Alternatives of issues for Revised Lambeth Local Plan

- 5B.3 Reasonable alternative (RA) approaches were considered in the Revised Lambeth Local Plan plan-making process for the key issues considered in the partial review: housing growth and infrastructure; affordable housing; housing for older people; self-build housing; business and jobs; town centres; hotels; waste; air quality; and transport. These issues were explored through a series of topic papers and questions to help facilitate consultation and feedback, with links to further evidence where relevant. The topic papers identified different possible ways (reasonable alternatives) of addressing the key issues. An SA was prepared on the reasonable alternatives (see Appendix 2 online) identified in the topic papers/online surveys against the sustainability objectives (SA Framework) that were developed as part of the Scoping Report process. The results of the SA work on the issues and reasonable alternatives has helped inform the DRLLP PSV 2020.
- 5B.4 The policy team has reported that in determining the policy approach to progress for each revised local plan issue, it is important to stress that the SA on the issues and reasonable alternatives was only one consideration, alongside consultation results, evidence and conformity with regional and national policy requirements. In other words, no decision about which option to pursue was made solely on the basis of the SA. Some examples of how the SA on issues and reasonable alternatives has influenced policy approach include:
- *Topic 1: Housing growth and infrastructure*
 - Issue 1 – options 1 and 2 both being pursued on the basis that both make a positive contribution overall to the sustainability of growth in

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

some Lambeth-specific policy proposed.

Consultation responses on the SA Issues and Reasonable Alternatives

- 5B.5 Consultation was undertaken from October to December 2017 and thirteen representations were received on the SA Issues and Reasonable Alternatives, of which six made comments on the SA. Some respondents welcomed that an SA had been undertaken and hoped that it had been widely publicised and circulated so that it was read and understood by the majority of residents. One respondent noted it was pleasing to see the rigour attached to some of the environmental criteria, particularly of alternative options for which developments should be assessed for their impact on air quality, but was disappointed that the reasonable alternatives proposed and assessed for the estates regeneration programme did not include a minimum level of accommodation at council rents, given the negative impact of current policy on deprived communities. In response, the policy says that all existing affordable housing should be replaced like for like, including low cost social rented housing. The policy also seeks to max the provision of affordable housing through estate regeneration schemes and to ensure this each proposal must be viability tested. It's considered not possible to set a minimum level of accommodation at council rents across the board because the circumstances of each scheme are different.
- 5B.6 One respondent commented on the SA framework and its prompt questions. In relation to the prompt question on reducing Lambeth vulnerability to terrorist action, the respondent commented that Brixton streets are overcrowded and any incident with a car would have major implications. They also questioned promoting walking as healthy whilst the air quality is so bad, and improving access to libraries whilst closing them down. The respondent also questioned the SA objective of ensuring everyone has 'quiet enjoyment of that home' when there are two flight paths that cross over Brixton, and Lambeth has scaled back its noise control teams. These comments have been taken into consideration in the preparation of this SA.
- 5B.7 One respondent commented with specific reference to Key Industrial Business Areas, most notably Knollys Yard. The respondent considered that the SA had not considered the impact on existing residents to the change of boundaries or new areas. With regards to Knollys Yard, it was considered that there will be a negative impact on residents not just in Knollys Road and Cameron Place but also York Hill which is unsuited to heavy vehicles on the narrow steep railway bridge. The respondent suggested that a sustainable solution to designating Knollys Yard as a KIBA should be to explore an underpass road connection to Leigham Vale. The respondent would be supportive of a mixed-use development that offers community space and affordable business rates for offices along with housing on the Knollys Yard site. In response, the current use of Knollys Yard falls into the definition of industrial land so KIBA designation does not change that, it just gives greater protection to the industrial floorspace on site. This site will be considered for inclusion in the SA DPD which will undergo its own process of SA looking at specific proposals for each site. Such matters would also be considered as part of any development proposed for the site as part of the planning application process.
- 5B.8 Historic England commented that they would have liked to see the scoping report alongside the SA report. Historic England made reference to their comments on the Scoping Report 2016, which included suggestions in relation to the baseline evidence, including reference to the work in progress on intervisibility to establish sensitivity in relation to Westminster World Heritage Site. They also recommended reference to characterisation information and a simplified (disaggregated) approach to the historic environment in the SA Framework. These comments have been noted and incorporated in the SA.

Assessment of new policy approaches in DRLLP PSV 2020

- 5B.9 The process of preparing the DRLLP 2018 and then the DRLLP PSV 2020 has involved consideration of consultation responses together with evolution of draft London Plan as well as SA recommendations made throughout the plan-making process. All iterations of the local plan to date (including the DRLLP PSV) have contained a strong drive towards housing growth (in line with draft London Plan targets). The balance between maintaining a stock of industrial land and retaining industrial floorspace capacity as required by draft London Plan on the one hand; and accommodating housing capacity and finding capacity for increased delivery of housing has largely remained the same throughout the plan review process. There has been a particular emphasis on optimising delivery of housing on small sites in the DRLLP PSV with further amendments to policy made in response to comments from the Mayor of London. These include policy H3 with the removal of policy support for flat de-conversions or change of use from housing to nursery; policy H6 with the reduction in the threshold for residential conversions from 150sqm to 130sqm and policy Q14 development in gardens where a balance is made between allowing for some development on larger gardens in carefully prescribed circumstances while safeguarding garden space and amenity. A Design Code SPD will be prepared to ensure good design on small sites. The package of policy measures are proposed in response to draft London Plan policy H2 (where boroughs should pro-actively support well-designed new homes on small sites), and consultation comments including those received from the Mayor of London and therefore is considered to be the most reasonable policy approach for Lambeth in achieving its housing growth.
- 5B.10 Another area of policy change in the DRLLP PSV 2020 is policy T8 on servicing and freight consolidation. This is a new policy and has been derived in response to the draft London Plan and the Lambeth Transport Strategy which has been agreed since the DRLLP October 2018. Policy T8 is simply a way for the local plan to drive the objective relating to freight and servicing set out in the Transport Strategy. Alternative policy approaches were considered in the preparation of the Transport Strategy. Taking this and the requirement to be in general conformity with the London Plan into consideration; it is considered there are no reasonable policy alternatives to policy T8 servicing the freight.
- 5B.11 Policy EN4 seeks to achieve sustainable design and construction in all development proposals. The DRLLP PSV 2020 includes a new policy requirement for minor residential developments (1-9 units) to achieve at least 19% reduction in on-site carbon emissions beyond 2013 Building Regulations Part L. This equates to 19 per cent beyond 2013 Part L of the Building Regulations (equivalent of CSH Level 4) and is in accordance with the Written Ministerial Statement 2015 and subsequent Planning Practice Guidance on climate change. It is considered that this new element to the policy positively supports achievement of sustainable design and construction, DRLLP PSV 2020 climate change objective, the council's ambitions for addressing climate change, as well as SA objective 12 on climate change.

5C POLICIES APPRAISAL

- 5C.1 A common approach to Sustainability Appraisals is to assess policies individually against each of the SA objectives usually in a matrix format. The approach to this SA is to assess the DRLLP PSV 2020 as a whole against each of the 19 SA objectives. In terms of policy assessment; this is considered the most appropriate method as it would be misleading to conclude that an individual policy would have a negative impact on an SA objective when another policy in the DRLLP PSV 2020 has been included to ensure such a negative impact is avoided.
- 5C.2 To assist the SA process on the DRLLP PSV 2020 policies, it was necessary to first screen them broadly against the SA objectives to determine whether each policy was capable of having any significant effect (either positive or negative) on the attainment of any of the SA objectives. This judgment was based on the subject matter of the policy. This screening process identifies which policies to particularly focus on when appraising the effect of the DRLLP PSV 2020 on each of the SA objectives (indicated as shaded cells). The results of the screening exercise are shown in Table 7 and indicate that the achievement of the SA objectives will largely depend on the sustainability and implementation of a variety of DRLLP PSV 2020 policies, and that most policies interact with a number of objectives.
- 5C.3 In accordance with the requirements of the SEA Directive and guidance for SAs, the appraisal is structured under the following sub-headings:
- Relevant policy objectives (national, regional and local).
 - Baseline conditions, existing issues and their likely evolution without the plan.
 - Likely significant effects of implementing the DRLLP PSV 2020 as a whole, taking into account mitigation.
 - Recommendations for monitoring likely significant or uncertain effects.
- 5C.4 Relevant policy objectives, baseline conditions and existing issues that are described in the appraisals below offer updated data or particularly pertinent policy objectives to the appraisal work and these act to supplement information provided in the Scoping Report 2016 and section 4 of this report.
- 5C.5 Where appropriate, recommendations to improve the sustainability performance of policies have been proposed in the SA process alongside the plan making process (see Appendix 1). Where recommendations have been made in this SA process; these have been discussed and considered concurrently with the policy team preparing the DRLLP PSV 2020 so that the DRLLP PSV 2020 could benefit from incorporating the SA recommendations.
- 5C.6 The assessment of significant effects of DRLLP PSV 2020 on an SA objective includes expected magnitude and spatial extent, the timescale over which they will have an effect, their likelihood, the impact of cumulative effects and whether the effect will be temporary or permanent. The topic based approach to this SA whereby the DRLLP PSV 2020 as a whole is taken into account also allows distinct identification, consideration and assessment of cumulative effects. Taking into account the Plan period (up to 2035) the following approach has been adopted for the timescales:

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

- 5C.7 Table 6 summarises the symbols that have been used in the appraisal of the DRLLP PSV 2020 to show the significance of likely effects arising from the Plan.

Table 6: Key symbols used in the appraisal

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

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Table 7: Screening of DRLLP PSV 2020 for potential to impact SA objectives

SA objectives →																			
Draft Revised Lambeth Local Plan Proposed Submission Version policies ↓	1. Crime	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Liveability	8. Built Heritage	9. Travel	10. Biodiversity	11. Green infrastructure	12. C.Change	13. Water	14. Waste	15. Air quality	16. Ed & Skills	17. Local economy	18. Regeneration	19. Worklessness
D1: Monitoring																			
D2: Presumption																			
D3: Infrastructure																			
D4: Obligations																			
D5: Enforcement																			
H1: Housing growth																			
H2: Affordable housing																			
H3: Existing housing																			
H4: Housing size & mix																			
H5: Housing standards																			
H6: Resid. conversions																			
H7: Student housing																			
H8: Specific comm. needs																			
H9: Hostels and HMOs																			
H10: Gypsy & Traveller																			
H11: Estate Regeneratn																			
H12: Build to rent																			
H13: Shared living																			
ED1: Offices (B1a)																			
ED2: Affordable workspc																			
ED3: KIBAs																			
ED4: Non-desig industria																			
ED5: Work-live devmt																			
ED6: Railway arches																			
ED7: Town centres																			
ED8: Evening economy																			
ED9: Public Houses																			
ED10: A2 uses																			
ED11: Local centres																			
ED12: Markets																			
ED13: Visitor attractions																			
ED14: Hotels/visitor acc																			
ED15: Employmt Training																			
S11: Existing social infrastru																			
S12: New social infrastru																			
S13: Schools																			
T1: Sustainable travel																			
T2: Walking																			
T3: Cycling																			
T4: Public transport																			
T5: River transport																			
T7: Parking																			
T8: Servicing																			

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SA objectives →																			
Draft Revised Lambeth Local Plan Proposed Submission Version Policies ↓	1. Crime	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Liveability	8. Built Heritage	9. Travel	10. Biodiversity	11. Green infrastructure	12. C.Change	13. Water	14. Waste	15. Air quality	16. Ed & Skills	17. Local economy	18. Regeneration	19. Worklessness
T9: Mini-cabs, taxis etc																			
T10: Digital connectivity																			
EN1: Open space/GI/Bio																			
EN2: Food growing																			
EN3: Decentralised energ																			
EN4: Sust. design/constr																			
EN5: Flood risk																			
EN6: Drainage/watr mgmt																			
EN7: Sust. waste mgmt																			
Q1: Inclusive environmts																			
Q2: Amenity																			
Q3: Safety/crime prevent																			
Q4: Public art																			
Q5: Local distinctiveness																			
Q6: Urbn desn pub.realm																			
Q7: Urbn desn new devm																			
Q8: Desn qlty constrctn																			
Q9: Landscaping																			
Q10: Trees																			
Q11: Bldg alts & extns																			
Q12: Refuse/recyclg strq																			
Q13: Cycle storage																			
Q14: Devts in gardens																			
Q15: Boundary treatmts																			
Q16: Shop fronts																			
Q17: Advertismts/signag																			
Q18: Historic env																			
Q19: Westminster WHS																			
Q20: Statutory listd bdgs																			
Q21: Registered parks																			
Q22: Conservation areas																			
Q23: Local heritage list																			
Q24: River Thames																			
Q25: Views																			
Q26: Tall buildings																			
Q27: Basements																			
PN1: Waterloo/Sth Bank																			
PN2: Vauxhall																			
PN3: Brixton																			
PN4: Streatham																			
PN5: Clapham																			
PN6: Stockwell																			
PN7: West Norwood																			

Sustainability Appraisal

Draft Revised Lambeth Local Plan Proposed Submission Version January 2020

SA objectives →																			
Draft Revised Lambeth Local Plan Proposed Submission Version policies ↓	1. Crime	2. Health	3. Services	4. Infrastructure	5. Equality	6. Housing	7. Liveability	8. Built Heritage	9. Travel	10. Biodiversity	11. Green infrastructure	12. C.Change	13. Water	14. Waste	15. Air quality	16. Ed & Skills	17. Local economy	18. Regeneration	19. Worklessness
PN8: Kennington/Oval																			
PN9: Herne Hill																			
PN10: Loughborah Juctn																			
PN11: Upper Norwood/ Crystal Palace																			

5C1 CRIME

5C1.1 This section of the SA relates to the sustainability performance of the DRLLP PSV 2020 against:

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

5C1.2 The causes of crime and vandalism are complex but it is widely accepted that environmental factors can play a part. The planning system can be instrumental in producing attractive and well-managed environments that can influence the level of criminal activity, anti-social behaviour and perception of crime. To achieve objective 1, plan policies should reduce opportunities to commit crime and engage in antisocial behaviour; help address the fear of crime as well as crime itself; create conditions for communities to develop which will support a reduction in crime and fear of crime; reduce Lambeth's vulnerability to major challenges such as climate change and water shortages; reduce accidental injuries and deaths among young people; and reduce Lambeth's vulnerability to terrorist action.

Relevant policy objectivesNational Level

5C1.3 The *Crime and Disorder Act 1998* imposes a duty on the council to have regard to the crime and disorder implications of its decisions and the need to do all it reasonably can to prevent crime and disorder in its area.

5C1.4 With reference to crime, the *National Planning Policy Framework 2019* states that planning policies should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas (para 91). Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience (para 127).

Regional Level

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

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

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

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

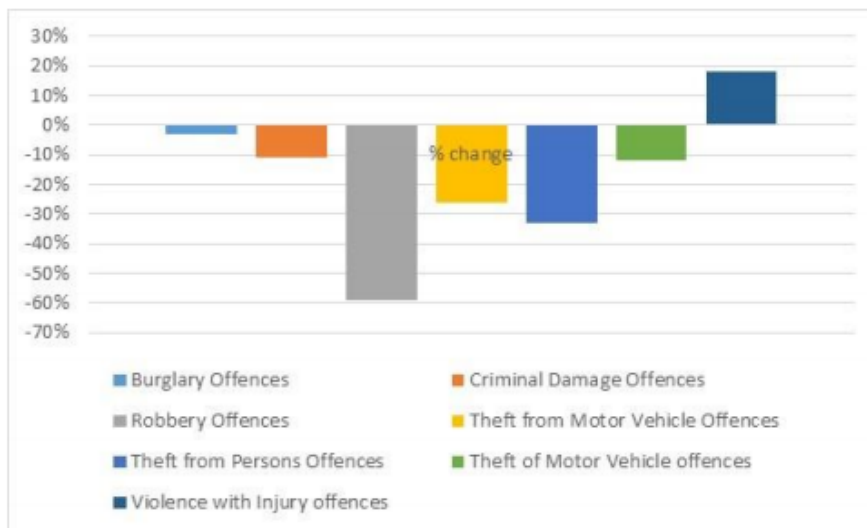
Baseline conditions and existing issues

5C1.7 Lambeth remains a high crime area, amongst the highest London boroughs for several priority crime types, as set by the Mayor’s Office for Policing and Crime (MOPAC). There has been a 24% reduction in these priority crimes since 2012, with significant reductions in these priority crimes in recent years, apart from Violence with Injury (SOB 2016). Therefore this needs to be addressed, and regeneration in the borough provides good opportunity to reduce crime and fear of crime.

Crime Types in the borough

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

Percentage change in offences from 2012-15



5C1.8 The latest State of the Borough Report (2016) states Lambeth has high rates of violent, sexual crime and drug related crime. It has the 6th highest crime rate in London; the 2nd highest rate for Violence with Injury, Sexual Offending and Drugs, and the third highest number of Anti-Social Behaviour (ASB) calls to Police compared to the rest of London. The National Domestic Violence Helpline reports that calls received from Lambeth residents is the third highest in London, and it is the highest

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ranking borough in the MPS for reported 'Most Serious Violence against Women' (SOB 2016).

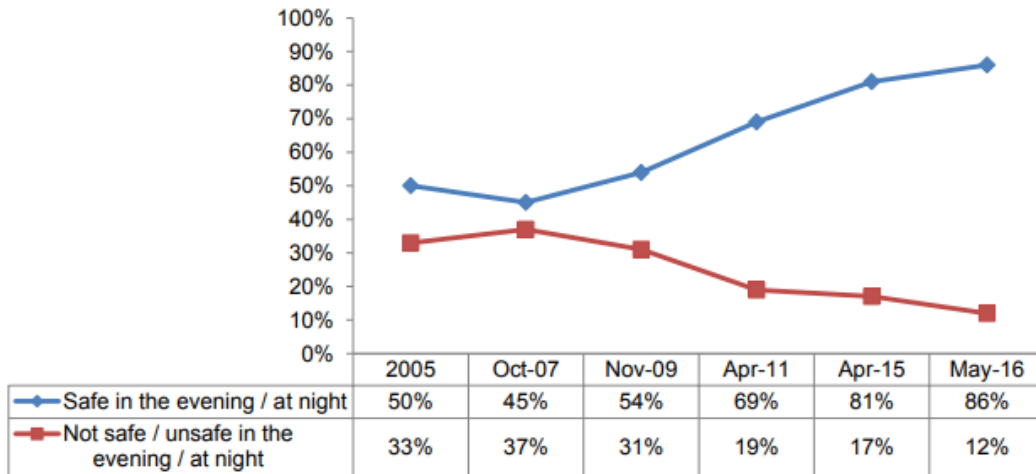
5C1.9 The Metropolitan Police website provides the following year end crime statistics 2018/19 for Lambeth (see below table) and shows the occurrence of a variety of crime, including a range of hate crimes.

Major Text	Minor Text	Offences & Sanction Detection Count		Percentage Change	
		Type / Financial Year		Type / Financial Year	
		Offences		Offences	Sanction Detections
		fy17-18	fy18-19	fy18-19	fy18-19
Hate	Anti-Semitic	6	6	0.00%	
	Disability Hate Crime	27	10	-62.96%	-50.00%
	Domestic Abuse Hate Crime	2,731	3,151	15.38%	-16.20%
	Domestic Abuse Homicide	1	0	-100.00%	-100.00%
	Domestic Abuse VWI	955	906	-5.13%	-19.08%
	Faith Hate Crime	78	61	-21.79%	-9.09%
	Homophobic Hate Crime	172	195	13.37%	-24.00%
	Islamophobic	64	41	-35.94%	-20.00%
	Racist and Religious Hate Crime	712	709	-0.42%	-21.24%
	Transgender Hate	6	9	50.00%	
Special	Artifice Burglary	36	39	8.33%	
	Dog Attack	51	43	-15.69%	33.33%
	Gun Crime	139	140	0.72%	40.00%
	Gun Crime Lethal Barrelled Discharged	35	57	62.86%	0.00%
	Gun Crime Personal Robbery	32	24	-25.00%	-50.00%
	Homicide	4	8	100.00%	25.00%
	Knife Crime	728	573	-21.29%	-34.96%
	Knife Crime With Injury	265	207	-21.89%	-23.08%
	Knife Crime with Injury Pers Robb	32	19	-40.63%	100.00%
	Robbery Mobile Phone	543	396	-27.07%	-50.00%
	Theft Person Mobile Phone	1,292	1,185	-8.28%	-50.00%
	TNO State Based	3,591	3,484	-2.98%	-33.25%
	TNO Victim Based	31,387	31,687	0.96%	-18.30%

5C1.10 Youth re-offending rate remains high, first time entrants to the criminal justice system are increasing and gang related violence remains a problem. Lambeth is one of the riskiest places for teenage males (15 to 19) becoming a victim of crime. Hate crime is increasing; racist offences have increased by 36% and homophobic offences by 34.9% (SOB 2016).

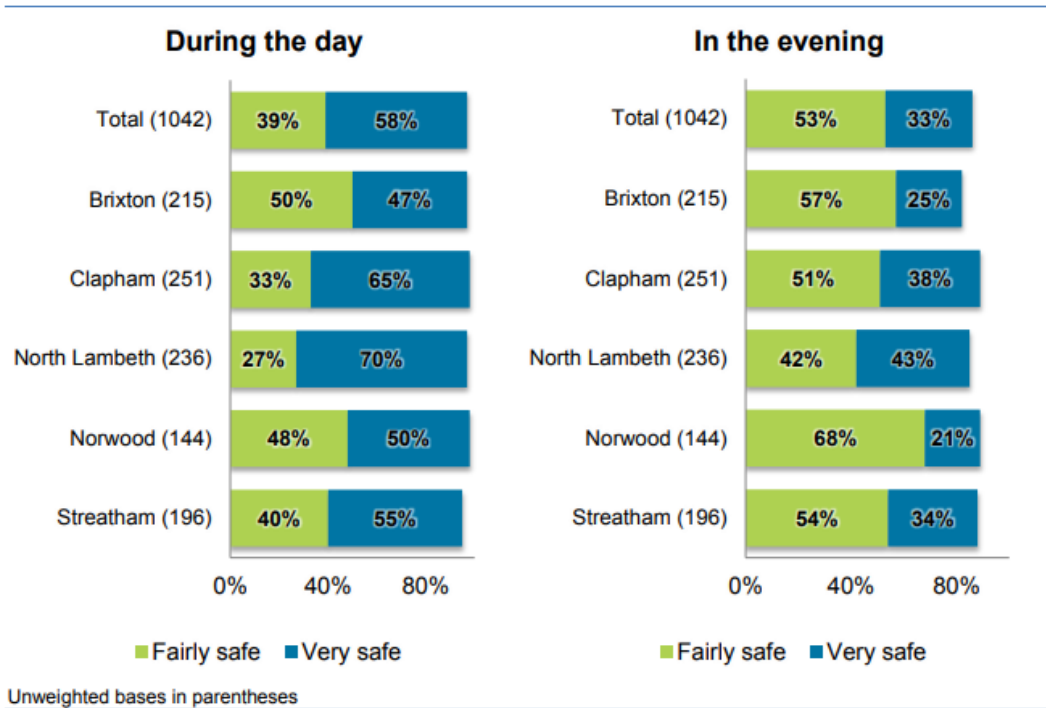
5C1.11 Despite the above, the borough is generally seen as a safe place to live. More than nine in ten residents (97%) agree that they feel safe walking in their local area during the day. This is in line with the 96% observed in 2015. As is common in surveys of this type, the proportion who feel safe walking in their local area in the evening is lower. However, the 86% of residents who feel safe in this context, represents a 5-percentage point increase since 2015 (Lambeth residents survey 2016).

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



5C1.12 Within the overall proportion of residents who feel safe in their local area during the day the response of very safe is most commonly given (58%). Breaking responses down further by the five areas that make up the borough, feeling 'very safe' is the most common response in four of these areas. Only in Brixton is the proportion who feel fairly safe (50%) greater than the proportion who feel very safe (47%). In the evening more residents in the borough state that they feel fairly safe (53%) rather than very safe (33%). Only in North Lambeth are the proportions selecting each response in relation to evening safety balanced as shown by the figure below.

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



5C1.13 Although perceptions of safety are high in the general population it is important to explore whether there are significant variations in the proportions who feel unsafe. Experiences of public spaces can differ in terms of age, gender and ethnicity so it is necessary to view the results in this way. When considering their safety during the day there are only minor variations in the proportion who feel unsafe walking in their local area with no differences evident by ethnicity and gender.

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

Box 2: Who is more likely not to feel safe during the day and in the evening?

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

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

Likely future evolution without the DRLLP PSV 2020

5C1.16 Crime is a complex issue that involves multiple lifestyle and socio-economic factors. Addressing these is the target of other organisations, most notably the police and education sectors. Therefore, crime rates may reduce somewhat without the DRLLP PSV 2020.

5C1.17 However, the built environment will remain, and this is how the DRLLP PSV 2020 can play an instrumental role in reducing crime and fear of crime: by designing and planning out crime, opportunity for crime and fear of crime. In absence of the DRLLP PSV 2020, London Plan policies encourage developers to work with 'designing out crime' officers. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of revised Policies

5C1.18 This section examines the likely significant effects of implementing the proposed DRLLP PSV 2020 policies on SA Objective 1, crime. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the proposed Plan.

5C1.19 The following policies have been screened as having potential for significant effects on this objective.

D1 – Delivery and monitoring	T4 – Public transport infrastructure
D2 – Presumption in favour of sustainable development	T5 – River transport
D3 – Infrastructure	T7 – Parking
D4 – Planning obligations	T9 – Minicabs, taxis, private hire and ride hail services
H1 – Maximising housing growth	Q3 – Safety, crime prevention and counter terrorism
H3 – Safeguarding existing housing	Q6 – Urban design: public realm
H5 – Housing standards	Q7 – Urban design: new development
H6 – Residential conversions	Q12 – Refuse/recycling storage
H9 – Hostels and houses in multiple occupation	Q13 – Cycle storage
H11 – Estate regeneration	Q15 – Boundary treatments
ED6 – Railway arches	Q16 – Shop fronts
ED7 – Town centres	PN1 – Waterloo and South Bank
ED8 – Evening economy and food and drink uses	PN2 – Vauxhall
ED9 – Public Houses	PN3 – Brixton
ED10 – A2 uses, betting shops and payday loan shops	PN4 – Streatham
SI1 – Safeguarding existing social infrastructure	PN5 – Clapham
SI2 – New or improved social infrastructure	PN6 – Stockwell
SI3 – Schools	PN7 – West Norwood/Tulse Hill
T1 – Sustainable travel	PN8 – Kennington/Oval
T2 – Walking	PN9 – Herne Hill
T3 – Cycling	PN 10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace

Delivery policies D1 – D4

5C1.20 Policies D1- D4 will contribute towards the attainment of SA Objective 1 through working with a range of partners (including police), delivering regeneration defined in Opportunity Area Planning Frameworks and local areas master-plans, including optimising use of vacant buildings (which can attract anti-social behaviour and create intimidating environments increasing fear of crime). The council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth. Section 106 and CIL funding will provide or fund local improvements including those to public realm on community safety, walking and cycling improvements and social infrastructure that all work to reduce crime and fear of crime. Overall, it is considered these policies should result in significant positive effects with regards to SA Objective 1.

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

5C1.21 A direct effect of Policy H1 maximising housing growth is that increased housing will likely result in increased population growth in the borough. More people may increase the likelihood of more crime or the reporting of more crime. Planning policy design tools such as CPTED (Crime Prevention through Environmental Design) and ‘Secured by Design’ can ‘design out’ crime, and there are other proposed policies that will mitigate the effects of population growth in the aim of reducing and preventing crime and fear of crime. Policy H3 clause (d) of the DRLLP PSV 2020 also supports proposals that would bring back into use long-term empty homes and derelict empty homes which will help to create safer communities and reduce crime and disorder as derelict homes and properties can contribute to unsafe environments that attract anti-social behaviour and increase fear of crime.

5C1.22 Policy H5 housing standards makes reference to safety and surveillance by stating that communal amenity space should be overlooked by habitable rooms. This has dual benefit of creating a safer environment for children to play in and others to use, (including more vulnerable adults or protected equality groups), and also discouraging unsavoury loitering that contributes to fear of crime and unsafe environments, particularly in housing estates or other communal spaces. New

residential development will also be expected to provide dual-aspect accommodation, further creating opportunity for passive surveillance. Policy H6 on residential conversions seeks to maintain an appropriate stock of family accommodation while allowing for converted dwellings in certain circumstances and also seeks to promote a safer environment by limiting on-street parking. For example in controlled parking zones no additional car parking permits will be issued to any occupiers of additional housing units created through the conversion. The DRLLP noted that where there is no controlled parking zone and existing on-street parking is at 85% or more, any additional car parking needs to be off-street. The previous SA on the DRLLP suggested that this may be difficult to enforce and not necessarily prevent additional on-street car-parking stress nor prevent additional vehicle movements in the local area (although for off-street parking, will in some way limit movements through the maximum standards on policy T7 parking). Therefore, a recommendation was made that the policy team may wish to revisit clause (vi) of policy H6 to more effectively minimise vehicle movements and thereby reduce risk of potential traffic accidents to pedestrians and cyclists (SA DRLLP recommendation 1). The DRLLP PSV 2020 has removed reference to the existing car parking provision in the street being at 85 per cent occupancy or above. Furthermore, the policy team noted that this aspect of design will be addressed in the Design Code SPD. The response is noted and considered appropriate to address the SA recommendation on the DRLLP and positively contribute to SA Objective 1 by helping to ensure safe communities through vehicle movements and the reduced risk of traffic accidents.

- 5C1.23 Policy H9 seeks to protect existing hostels and HMOs which can help the homeless with overnight accommodation, providing opportunity for a safer environment for these people while also reducing opportunities to commit crimes against these people. Similarly, fewer homeless people on the streets helps address fear of crime as well as crime itself and antisocial behaviour in local areas. The policy also recognises hostels and HMOs accommodating vulnerable groups (such as young offenders undergoing rehabilitation or half-way house accommodation for those returning to independent living) which can, in some cases, result in anti-social behaviour when too many such uses are located in close proximity. The policy therefore seeks to avoid harmful over-concentration and new uses of this nature should generally be located at least 150m away from similar premises.
- 5C1.24 Policy H11 on estate regeneration goes some way to provide safe communities, however it was considered that this could be strengthened in the SA on the DRLLP. Previously, clause (f) of the policy referenced to safety, but only where external amenity space standards of policy H5 are not met. SA recommendation 2 on the DRLLP has been incorporated in the DRLLP PSV 2020. Policy H11 clause (h) has been amended to reference safety on housing estates as follows: 'Estate regeneration schemes should seek to ...improve safety and access for walking, cycling and public transport use to local amenities for residents;...'. This amendment is considered to positively affect SA Objective 1 while also helping to better achieve other SA objectives such as health and well-being, access and services, equalities, liveability and transport. It is further recognised that all Q policies of the DRLLP PSV 2020 will also apply to estate regeneration schemes, including policy Q3 safety, crime prevention and counter terrorism.

Economic and town centre policies ED6 – ED11

- 5C1.25 Left unmanaged railway arches, in particular those that are isolated and/or outside major, district and local centres, can become disused environments that may attract loitering and anti-social behaviour. Policy ED6 seeks to make efficient use of railway arches, and applications affecting arches will need to improve the immediate environment including safety and lighting which will help to reduce opportunity for

crime and fear of crime and also help protected equality groups to feel safe (for example LGBTQ+, race, younger persons, women). Proposals for nightclubs in railway arches outside of town centres will not be supported. Town centre and places and neighbourhoods policies are likely to help reduce and prevent crime and fear of crime by keeping areas active and occupied and creating opportunity for a flow of people entering and leaving premises and areas. Allowing for residential use on appropriate sites and above ground floor units in town centres also provides opportunity for passive surveillance and increasing activity levels in these areas. This will help achieve SA objective 1, as well as have positive effects for other SA objectives such as housing, equalities and liveability.

5C1.26 Evening economy uses include food and drink uses, night clubs, live music and/or dance venues and other entertainment activities and if not managed appropriately can result in a fear of crime, increased crime and/or antisocial behaviour. Policy ED8 seeks to avoid unacceptable harm to community safety and amenity of neighbouring residential areas and sensitive uses caused by evening and food and drink uses and thus positively contributes to achieving SA Objective 1.

5C1.27 In addition to evening economy uses some town centre uses such as betting shops can also exacerbate crime, fear of crime and/or loitering. Policy ED10 seeks to manage effects of such uses on amenity and crime levels. In so far as planning policy is able; it is considered that policy ED10 will result in significant positive effects on SA Objective 1 particularly in improving the environment to address fear of crime and anti-social behaviour. While it is noted that policy ED10 will likely result in positive effects for Lambeth in regards to limiting A2 uses, betting shops and payday loan shops and their relationship to crime and anti-social behaviour; it is acknowledged that this may, in some cases, result in displacement of demand and impacts on neighbouring boroughs. This can be acknowledged in the Statements of Common Ground with neighbouring boroughs.

5C1.28 The risk of terrorism is a legitimate concern for places where people congregate. It is acknowledged that policy Q3 applies to all development proposals. It is recommended that policy ED13 on visitor attractions, leisure, arts and cultural uses would benefit from cross-referencing to policy Q3. The policy team have accepted this recommendation and 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'. It is considered that this amendment contributes significant positive effects on the achievement of SA Objective 1.

SA recommendation 1: policy ED13 on visitor attractions, leisure, arts and cultural uses would benefit from cross-referencing to policy Q3

Policy response: 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'.

5C1.29 **Social Infrastructure policies S1, S2, S3**
It is considered that policies S1, S2 and S3 will result in positive effects with regards to SA Objective 1 as these policies seek to safeguard existing, and provide new social infrastructure which includes, for example, health care, youth centres. Retaining and providing new sports, recreation and education facilities also contributes to providing people, in particular young people, with opportunities to engage in sport and education which can reduce opportunities to engage in anti-social behaviour and in contrast promote more social cohesion and improve positive mental wellbeing. Proposals for schools will need to include travel plans and take into

account road danger reduction measures and this seeks to achieve targets set out in sustainability framework (Table 4) of SA Objective 1 regarding reducing traffic accidents.

Transport policies T1 – T7, T9

- 5C1.30 Policies T1 – T7 will likely result in positive effects in terms of SA Objective 1 as they seek to provide a safer road and traffic environment through use of sustainable travel, and promotion of walking and cycling. Policy T1 provides a road user hierarchy whereby walking and cycling are priorities, and private cars are at the bottom of the hierarchy. Walking and cycling will be made safer in the borough through implementation of policies T2 and T3 in particular, and policy T2 seeks to replace existing subways which can be areas that can feel unsafe to some people. This will also offer benefits to protected equality groups, for example LGBTQ+, race, gender reassignment, sex, disability, age). Policies T1, T2 (walking) and T3 (cycling) also make specific mention of reducing road danger concerns which positively contribute to SA objective 1. Policy T3 seeks the provision of secure cycle parking facilities, particularly at key locations such as shopping areas, transport interchanges and residential areas through off-street, covered, lit and secure facilities. This is further enhanced in policy Q13 and positively contributes towards SA Objective 1. As a result of the SA on DRLLP SA recommendation 3 has been incorporated in the DRLLP PSV 2020. T3(c) has been amended to soften the wording previously stating '*Lambeth will ensure that people who want to cycle are able to do so and are not discouraged by road danger concerns*' to make it more achievable within the planning policy remit and development proposals by now stating that '*Lambeth will help to enable people who want to cycle to do so and not be discouraged by road danger or air quality concerns*'. This is a positive effect on SA Objective 1.
- 5C1.31 Policy T5 river transport makes provision for new piers or improvements to existing piers for transport or leisure uses and the Thames riverside walk. Clause (e)(ii) makes reference that the riverside walk incorporates provision for safe use by cyclists. It is considered that safety of pedestrians is equally important, particularly where pedestrians and cyclists are expected to share space. It was recommended on the SA of the DRLLP that clause (e)(ii) makes reference to pedestrians as well (SA recommendation 4). As a result of this recommendation policy T5(e)(ii) has been amended to reference safe use by pedestrians as follows: 'incorporates provision for safe use by pedestrians and cyclists'. This is considered appropriate to satisfy the recommendation on the DRLLP and will likely result in positive effects on SA Objective 1.
- 5C1.32 Given motor vehicle crime is quite high in the borough (compared with other types of crime) it is considered appropriate that outdoor and open parking areas are well lit and monitored by CCTV where possible (policy T7). It was therefore suggested as a SA recommendation on the DRLLP that while it is recognised that policy Q3 will apply to car parking areas, given other policies explicitly mention natural surveillance and/or security measures (eg policy H5(c), policy T3 (c)), it seems reasonable to also include a reference to safety and security in policy T7 (SA recommendation 5). No change has been made as a result of this recommendation, as it was 'not considered necessary given the restrictive parking standards of the borough and the low anticipated rate of car parking provision in future new developments'. The response is noted and it is hoped that policy Q3 will be applied rigorously to any new car parking areas. Indeed given the level of motor vehicle crime in the borough, it is recommended the policy team consider including 'car parking areas' to policy q3(a)(ii) (particularly as this clause explicitly refers to cycle stores and refuse stores). Again, this recommendation has not been accepted by the policy team for the reason set out above.

5C1.33 As a result of SA Recommendation 6 on the DRLLP, the DRLLP PSV 2020 has been amended. The recommendation sought clarification on the interpretation of the word 'permeable' in the context of outdoor and open parking areas, questioning whether it refers to permeability in the sense of water penetration or wayfinding/legibility. The text in policy T7 clause (d) (vi) has been amended to clarify that it seeks to ensure that all outdoor and open parking spaces are permeable to water. While this may not address the potential crime and safety fears of parking spaces, it is noted policy Q3 will apply.

5C1.34 While policy T9 on mini-cabs, taxis and ride hail services does not directly reduce the need for motorised travel; it contributes to reducing the need for private vehicle ownership, and also plays a role in providing safe transport options for people at any time of day, but particularly at night time with regards to reducing fear of crime and feeling more safe. This is also likely to benefit particular protected groups such as women, older and younger persons, gender reassignment, LGBTQ+, BAME. Therefore it is considered that policy T9 positively contributes to attaining SA Objective 1.

Open Space

5C1.35 Policy EN1 seeks to protect, maintain and improve open spaces (including access). This could lead to a reduction in crime levels by facilitating more activity in these spaces. The policy also states that green corridors are created for safe pedestrian and cyclist access.

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

5C1.36 The quality of the built environment policies listed above, in particular policy Q3 safety, crime prevention and counter terrorism are the design policies most pertinent in achieving SA Objective 1. Policy Q3 is likely to result in significant positive effects in designing out crime, anti-social behaviour and fear of crime, and addressing terrorism in terms of design and resilience. Clause (b) (ii) requires applicants to meet the standards and objectives of the Secured by Design initiative, which seeks to improve the security of buildings and the immediate surrounds through good design to provide safe places to live, work, shop and visit. Furthermore, policy Q3 clause (a) (i) which requires proposals to use good design to design out crime-related issues such as opportunistic crime, anti-social behaviour has been amended in the DRLLP PSV 2020 to include youth violence as an issue that good design can address.

5C1.37 Policies Q6 and Q7 provide for the urban design of the public realm and new developments. Overall, it is considered that these policies support the attainment of SA Objective 1 and will likely result in significant positive effects. As a result of the SA on the DRLLP, SA recommendations 7 and 8 have been incorporated in the DRLLP PSV. Policy Q7 further improves and reinforces the importance of safety for pedestrians and cyclists through the addition of the word 'safe' to policy Q7 clause (viii). Furthermore, it is clarified that this clause is applicable both within the site and outside the site in the adjacent area. These additions will result in positive effects thus supporting SA Objective 1.

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

5C1.38 Policy Q13 on cycle storage states that cycle storage should be secure and safe to use which will result in positive effects on SA Objective 1.

5C1.39 It is considered that policies Q15 and Q16 will result in positive effects on SA

Objective 1, in particular, a reduced fear of crime. Policy Q15 states that front boundaries in non-residential areas should be open in character rather than solid (increasing visibility and passive surveillance), while front boundaries in residential areas should not exceed 1.2 metres in height, allowing surveillance to the street. Solid or perforated roller shutters or exposed, externally mounted shutter housings are not supported for shop fronts and security measures should be incorporated in an integrated design (internally where possible) (policy Q16), helping to reduce fear of crime. Over time, this should result in feelings of a safer, more attractive environment, and improved visual amenity, thereby contributing to attainment of SA Objective 1.

Places and neighbourhoods policies PN1 – PN11

5C1.40 In combination with other Draft Revised Lambeth Local Plan Proposed Submission Version policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN11) should result in positive effects in relation to SA Objective 1. These policies generally seek to provide vitalised, viable mixed use centres that increase activity, reduce the need to travel, and respect and enhance local character. Safe and accessible public realm and spaces are promoted in Waterloo and South Bank, Vauxhall, Brixton, Streatham, Clapham, Herne Hill and Loughborough Junction, and working with industry stakeholders to ensure safety where construction activity occurs is sought in Waterloo and South Bank, Vauxhall, Clapham, Kennington/Oval and Loughborough Junction. No more betting shops will be permitted in the Central Activities Zone in Waterloo, or anywhere in Brixton, Streatham or West Norwood/Tulse Hill town centres. The policies include improvements to public realm and transport infrastructure. It was recommended that the DRLLP should acknowledge and reflect the current crime baseline conditions for the borough's town centres in the PN policies (SA recommendation 9). No change was made to the PN policies as a result of this recommendation. The policy team did not consider it appropriate to reference the current baseline conditions for crime for each of the borough's town centres as reducing crime or the fear of crime is dealt with in other policies. However, the supporting text to policy ED8 Town Centres (a borough-wide policy) has been updated to note that natural surveillance from active-frontage uses can help to discourage crime and anti-social behaviour. The updated text reads: '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. This natural surveillance also has potential to discourage crime and anti-social behaviour. This includes all A and D class uses and appropriate *sui generis* uses such as beauty salons or nail bars; launderettes; nightclubs; and theatres...'. Furthermore, it is acknowledged that policy Q3 will apply to developments to ensure good design is used to design out crime and crime-related issues. The response and amendment is noted and considered appropriate to satisfy SA recommendation 9 on the DRLLP.

5C1.41 The supporting text in policy PN5, Clapham, recognises the 'very poor safety record' of Clapham High Street. As a result of the SA on the DRLLP, SA recommendation 10 has been incorporated in the DRLLP PSV 2020. Policy PN5, clause (g), now seeks to improve the quality and safety of Cycle Superhighway 7 (now known as Cycleway 7). Furthermore, clause (e) has been amended to strengthen the approach to improving Clapham town centre by not only supporting enhancements to the public realm but '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...'. These additions will result in positive effects to reduce crime or the fear of crime in the town centre, thus supporting SA Objective 1.

5C1.42 It was considered that policy PN10 Loughborough Junction, clause (c) (ii) of the DRLLP could also promote safe walking and cycling routes through Loughborough Junction, particularly as the policy seeks to do this by opening up railway arches, bridges and along viaducts for access – areas that can be susceptible to crime, fear of crime or antisocial behaviour. As a result of the SA on the DRLLP, SA recommendation 11 has been incorporated in the DRLLP PSV 2020. Clause (a) (vi) of policy PN10 has been updated to include reference to the creation of safe routes and safety as follows: ‘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’.. The amendments are considered appropriate to address the recommendation and further enhance the importance of ensuring safe communities with reduced crime and disorder, thus positively contributing to SA Objective 1. It is considered that these amendments better link to and support clause (c) of the policy. Furthermore, the policy states that new and existing walking and cycling routes should be enhanced through improved lighting and frontages activated to create surveillance, thus creating safer environments. This has been strengthened in clause (d) by adding ‘to reduce crime and fear of crime’ as follows: ‘New and existing walking and cycling routes should be enhanced to reduce crime and fear of crime through improved lighting, particularly under bridges, through arches, and along viaducts, and frontages should be activated to create surveillance’. This is considered to further enhance the importance of safety and positively contribute to SA Objective 1 as well as other SA objectives such as equalities and liveability. New clause (b) to the Loughborough Junction policy (DRLLP PSV 2020) is fully supported with regards to SA Objective 1 in helping to ensure local people have access to community facilities, particularly useful for young people and giving them places/ facilities to meet and mix.

Summary of DRLLP PSV 2020 policies

5C1.43 Overall, and taking into account the appraisal prompt questions and targets set out in Sustainability Framework, it is likely that the DRLLP PSV 2020 policies will have a significant positive effect on existing baseline conditions related to safe communities with reduced crime and disorder, in so far as planning policy can influence.

Table 8: Assessment of effects of DRLLP PSV 2020 on Crime objective

Assessment of effects of DRLLP PSV 2020 on SA objective 1	Score	Justification of Score	Timescale and probability	Permanent or temporary
Ensuring safe communities with reduced crime and disorder	++	Safety and crime are influenced by a wide range of factors, many of which are beyond the remit of a Local Plan. However, to the extent that local planning policy can play a part, it is considered that overall the DRLLP PSV will have significant positive effects on the crime objective. This is because of the design controls for developments (such as Secured by Design, and discouragement of roller shutters on shop fronts), rejuvenation and encouragement of activity in town centres, controlled number of betting and pawn shops, promotion of mixed use developments, provision of improved safety for cyclists and pedestrians including improved safer routes, passive surveillance of communal amenity space/children's play space and recognition of sufficient social infrastructure to accommodate the projected growth of population. Recognition of the threat of terrorism on visitor attractions, leisure, arts and cultural uses has now been included in policy ED13.	Safety measures and crime prevention through environmental design is a well-recognised and effective planning tool for addressing crime prevalence and opportunity. Therefore, in so far as planning can control, it is likely that there will be reduced crime, and fear of crime and improved safer environments for pedestrians and cyclists as a result of appropriate design measures being incorporated into developments. The majority of significant positive effects are likely to be evident in the medium to long term as development is delivered and occupied.	Permanent

Recommendations for monitoring likely significant effects

5C1.44 It is recommended that the following indicators are used to monitor the effects of the DRLLP PSV 2020 identified in the SA:

- Percentage of proposals directly incorporating 'Secured by Design' or 'Designing Out Crime' principles or receiving Secure by Design accreditation
- Recorded crimes per 1,000 households
- Resident surveys on perception of crime and level of safety in town centres
- Resident surveys on perception of crime and level of safety in public open spaces.

5C2 GOOD HEALTH AND REDUCED HEALTH INEQUALITIES

5C2.1 This section of the SA relates to the sustainability performance of the DRLLP PSV 2020 against:

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

5C2.2 Health inequalities are differences in health between people or groups of people that may be considered unfair (Public Health England 2017). For example, those with low socio-economic status, certain ethnic groups, particular geographical areas, and those with disabilities may have worse health than others. Simply put, it is the uneven distribution of good health.

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

Relevant policy objectivesNational Level

5C2.4 *National Planning Policy Framework 2019* sets out a range of policies that influence good health and health inequalities, including building a strong competitive economy, sustainable transport, wide choice of high quality homes, mitigating impacts such as noise from new development, ensuring safe and healthy living conditions, achieving well-designed places, and conserving and enhancing the natural and historic environments. Section 8 of the NPPF contains policy on promoting healthy and safe communities.

5C2.5 *Health profile for England 2019* is a report combining Public Health England data and knowledge with information from other sources to give a broad picture of the health of people in England in 2019. It explores the impact of risk factors on health outcomes such as life expectancy, trends in mortality and morbidity and risk factors, health of children in early years, health equalities, wider determinants of health and current and emerging health protection issues.

5C2.6 The Government commissioned review (*'Fair Society, Healthy Lives' February 2010*) into health inequalities made recommendations that the country strive to give every child the best start in life, provide people with more control over their lives, create fair employment and work for all, ensure healthy standards of living, create healthy and sustainable communities, and strengthen the role of prevention in health services.

5C2.7 The Local Government Group guide – *Plugging health into planning: evidence and practice 2011* provides practitioners with guidance and evidence on integrating health and spatial planning. The guide covers a range of areas including resident health inequality, obesity road traffic fatalities and injuries, improving mental health and wellbeing as well as practical case studies from around England.

Regional Level

5C2.8 The policies in the Draft London Plan seek to address the main health issues facing the capital, including mental health, obesity, dementia, cardio-vascular and respiratory diseases by seeking to ensure new developments and town centres are designed, constructed and

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

5C2.9 *London Health Inequalities Strategy 2018* describes some of the main issues which lead to inequalities in the health of different groups of Londoners, and proposes a set of aims for reducing them. There are five aims: healthy children, healthy minds, healthy places, healthy communities and healthy living.

Local Level

5C2.10 *Lambeth Cooperative Health and Well-being Strategy 2013-23* is a statement about what health and well-being means and how it impacts on individuals and families in Lambeth. It is a commitment to working together in a new, co-operative way to understand and address issues, and deliver tangible improvements for individuals and families, especially those with the greatest needs.

5C2.11 *Annual Public Health Report Lambeth 2018: People Place and Opportunity – Reducing health inequalities in Lambeth* talks about health inequalities in Lambeth but better refers to it as health inequities as the differences in health outcomes for different residents groups in Lambeth are unfair or avoidable. The report provides a stark warning – that things are already getting worse for many Lambeth residents.

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

Baseline conditions and existing issues

5C2.13 Health issues in Lambeth reflect its position as an inner-city urban area with a young population profile and a mix of deprivation and affluence. Lambeth fares comparatively worse for health inequalities when compared to national rates. The burden of ill-health results from lifestyle issues as well as resulting diseases and/or long-term conditions such as heart disease and cancer. Life expectancy in Lambeth is improving and the life expectancy for women is slightly above the national average at 83 years, but male life expectancy is around a year lower than the national average at 78.5 years. Both male and female life expectancy is lower than national averages (Lambeth Health Profile 2017) However, in some of the most deprived wards in Lambeth, life expectancy is 5.6 and 3.8 lower for men and women respectively when compared with the borough's least deprived areas (Lambeth Health Profile 2017). This reflects the significant adverse effect of poverty and deprivation on health. The gap in life expectancy is due to an excess of death from chronic obstructive

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

- 5C2.14 Life expectancy at birth, at ward level varies between 77.4 years (Clapham Town) and 84.8 years (Thornton). Most wards have a life expectancy similar to Lambeth with the exceptions highlighted in Figure 4 below.

Figure 4: Life expectancy at ward level

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

(SOB 2016)

- 5C2.15 Conditions that contribute to Lambeth's lower (when compared against England) life expectancy include circulatory diseases such as coronary heart disease and stroke; cancer, especially lung cancer; respiratory diseases such as chronic obstructive pulmonary disease; digestive diseases such as cirrhosis of the liver; external causes such as suicide and violence; infectious and parasitic diseases, and mental health and behavioural disorders (SOB report 2016).
- 5C2.16 Over 85% of people in Lambeth say they are in good or very good health. There are around 14,000 people who are in bad or very bad health, just under 5% of the population. This pattern is typical of London boroughs. Approximately one in four Lambeth households has someone with a long-term health problem or disability, which is similar to London. About 6% of Lambeth residents have their day-to-day activities limited a lot by a long-term health problem or disability (18,600 people), and another 6.6% (20,000 people) are limited a little. Around 20,500 people provide unpaid care to someone else, just under 7%. This is one of the lowest rates of provision of unpaid care in London (SOB 2016).
- 5C2.17 There are a growing number of people with learning disabilities living in the borough. The proportions of people with mental health problems and with physical disabilities and older people helped to live at home are increasing. One-third of those aged 65+ is estimated to live alone. The number of those aged over 85 is expected to increase which will significantly increase age-related long-term conditions and demand for care services. This includes some people with enduring mental health needs who will become part of the ageing population, with particular housing needs.
- 5C2.18 Lambeth has a relatively high birth rate in comparison to national averages, but has a lower rate than other inner London authorities and the rate has been reducing over the past four years after years of growth since 2001 (ONS, 2017). The infant mortality rate (death in babies under 1 year) has decreased steadily in Lambeth and is currently 4.1 deaths per 1,000 live births, which is broadly in line with the London and national averages.

- 5C2.19 The Lambeth Clinical Commissioning Group (CCG), a group of 44 GP practices in the borough, work with the council and pharmacies, dentists, hospitals and mental health providers, to commission NHS services for residents. The Lambeth Public Health Directorate now sits within the council. *Lambeth Healthcare Infrastructure Analysis* undertaken by the London Healthy Urban Development Unit in July 2018 for the Lambeth CCG, sets out the future need for GP space by each CLIP area and CCG Locality in Lambeth. It identifies a shortfall of 16 GP clinical rooms by 2028 across the borough, with a shortfall identified in the north of the borough and in Streatham.

Likely future evolution without the DRLLP PSV 2020

- 5C2.20 National policies will not work without effective local delivery systems focused on health equity in all policies. In terms of planning, if there was no up-to-date Local Plan document for Lambeth, reliance would fall on policies within the London Plan and NPPF and risk losing the local context and wider determinants of health specific to Lambeth.
- 5C2.21 Health is a complex issue and involves multiple lifestyle and socio-economic factors. Addressing these is the target of many other plans and strategies of competent and experienced organisations. Therefore, such factors and inequalities may improve without the DRLLP PSV 2020. However, planning has an important role to play by ensuring that development does not exacerbate health inequalities, but results in an improved inclusive environment for everyone. Health inequalities will continue to exist without local intervention and the improvement of people's quality of life (for example warmer homes and more efficient to heat reducing fuel poverty, access to local jobs, encouraging and making walking and cycling safer and attractive, limiting hot food takeaways near schools, improving local air quality, planning for health infrastructure and improved access to open space, green infrastructure and nature).

Assessment of DRLLP PSV 2020 Policies

- 5C2.22 This section examines the likely significant effects of implementing the proposed DRLLP PSV 2020 policies on SA Objective 2, Health. It reviews policies and discusses the likely effects, as well as providing a summary of the likely effects, of the whole Plan on the objective. This review takes account of mitigation already included within the DRLLP PSV 2020.
- 5C2.23 Health is a complex matter and as such, a wide range of factors, relationships and conditions can influence good health and reduce health inequalities. Therefore it is considered that a broad range of policies within the DRLLP PSV 2020 may impact on the attainment of improving conditions and services that facilitate good health and reduce health inequalities. The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	T3 – Cycling
D2 – Presumption in favour of sustainable development	T4 – Public transport infrastructure
D3 – Infrastructure	T5 – River transport
D4 – Planning obligations	T7 – Parking
H1 – Maximising housing delivery	T9 – Digital connectivity infrastructure
H2 – Delivering affordable housing	EN1 – Open Space, green infrastructure and biodiversity
H3 – Safeguarding existing housing	EN2 – Local food growing and production
H4 – Housing mix in new developments	EN3 – Decentralised energy
H5 – Housing standards	EN4 – Sustainable design and construction
H6 – Residential conversions	EN5 – Flood risk
H7 – Student housing	EN7 – Sustainable waste management
H8 – Housing to meet specific community needs	Q1 – Inclusive environments
H9 – Hostels and houses in multiple occupation	Q2 – Amenity
H10 – Gypsy and Traveller needs	Q3 – Safety, crime prevention and counter terrorism
H11 – Estate regeneration	Q9 – Landscaping
H12 – Build to rent	Q10 – Trees
H13 – Large-scale purpose-built shared living	Q12 – Refuse/recycling storage
ED1 – Offices (B1a)	Q13 – Cycle storage
ED2 – Affordable workspace	Q14 – Development in gardens and amenity spaces
ED3 – KIBAs	Q24 – River Thames
ED4 – Non-designated industrial sites	Q25 – Views
ED5 – Work-live development	Q26 – Tall buildings
ED7 – Town centres	Q27 – Basement development
ED8 – Evening economy and food and drink uses	PN1 – Waterloo and South Bank
ED9 – Public Houses	PN2 – Vauxhall
ED10 – A2 uses, better shops and payday loan shops	PN3 – Brixton
ED11 – Local centres and dispersed local shops	PN4 – Streatham
ED12 – Markets	PN5 – Clapham
ED15 – Employment and training	PN6 – Stockwell
SI1 – Safeguarding existing social infrastructure	PN7 – West Norwood/Tulse Hill
SI2 – New or improved social infrastructure	PN8 – Kennington/Oval
T1 – Sustainable travel	PN9 – Herne Hill
T2 – Walking	PN10 Loughborough Junction
	PN11 Upper Norwood/Crystal Palace

Delivery and monitoring policies D1 – D4

5C2.24 Policies D1- D4 will contribute towards the attainment of SA Objective 2 through working with a range of partners (including NHS Lambeth Clinical Commissioning Group and Hospital Foundation Trusts), delivering regeneration defined in Opportunity Area Planning Frameworks and local area master-plans, including promotion and maintenance of mixed, balanced and diverse communities, and accessible, child-friendly environments. The council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth and this will benefit the health of the borough. Section 106 funding will provide or fund local improvements such as those to public realm for community safety, walking and cycling improvements, social infrastructure, access to employment opportunities, access to facilities, local food production and growing which each on their own and cumulatively, will likely result in significant positive effects on health and well-being in the borough.

Housing policies H1 –13

5C2.25 Following an assessment of the policies; it is considered that overall the DRLLP PSV 2020 housing policies (coupled with other relevant policies such as the quality of the built environment and environment policies) will generally have positive effects on the achievement of SA Objective 2. The provision and safeguarding of housing, including affordable housing and estate renewal / regeneration will contribute to improved mental, emotional and physical health and wellbeing for some residents of the borough, particularly more vulnerable groups. Residential stability reduces the stress and disruptions associated with frequent or unwanted moves, thus contributing to

better mental health. The housing size mix and design required by the residential policies seeks to provide and safeguard family sized housing (reducing the risk of overcrowding and possible consequential health impacts such as infectious diseases, stress, parasites, etc.), provide adequate internal and external amenity space, and provide housing to meet specific community needs to help house more vulnerable people of society. Where leisure facilities (particularly swimming pools, gyms and other indoor and outdoor sports facilities) are provided in student accommodation developments, policy H7 states that these facilities should be made available to the public in locations where there is an identified shortage of provision. This will help improve physical health, help people lead healthier lives and live an inclusive and active lifestyle.

5C2.26 Policy H5 also provides for external amenity space. Houses, ground floor flats and family sized units should preferably have direct access to a private garden which provides positive effects in terms of SA Objective 2. Access to amenity space provides significant health benefits, helping to reduce stress and improve mental and physical wellbeing. Clause (c) of the policy provides a list of criteria for the design of communal amenity spaces. It has been amended to state that communal amenity space should be accessible to all residents of the development, irrespective of tenure, thus ensuring all residents access to amenity space and contributing to better health effects. However, as per the recommendation on the DRLLP, it was considered that this list of criteria could be improved to actively encourage and entice actual use of communal amenity space by residents, rather than the space being provided to 'tick the box'. It was recommended that the policy team revisit and improve policy H5 (c) on communal amenity areas to increase and encourage the actual use of such spaces (SA Recommendation 12). While it is recognised that the provision of a grassed area with perhaps a couple of shrubs, but otherwise void of any other amenities arguably meets the criteria, providing seating and other types of outdoor furniture/amenities together with strategically thought out landscaping/design to attract people to use these spaces would positively improve mental, emotional and physical health and well-being, particularly in areas of open space deficiency. As far as possible, communal amenity areas should enable experiences. The Green Infrastructure Strategy identifies four broad types of experience:

- Active spaces providing a focus for recreation and the community
- Tranquil contemplative spaces
- Wild spaces to connect with nature
- Designed / cultural spaces providing a sense of place and history.

The use of communal amenity space is increasingly important as the population continues to grow and there is a lack of land to create new public green open spaces, particularly in areas already identified as being deficient in access to open space. While it is recognised that Draft London Plan policy G5 on the urban greening factor will apply to all major developments, measures to improve usability of such spaces would be welcomed. As a result of SA recommendation 12 on the DRLLP, policy text has been amended. Policy clause (c) (iii) has been amended to read: 'be designed and inclusive for all users'; clause (c) (vi) has been included to read: 'be accessible to all residents of the development, irrespective of tenure' and supporting text has been amended to include the following sentence: 'The quality of amenity space should meet the requirements of policy Q2'. These amendments are commended however it is still not convincing that these amendments 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 Draft 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'. The policy team has accepted this recommendation and the aforementioned text is included in policy H5(c)(vii). It is considered this amendment will result in significant positive effects on SA Objective 2, as well as Objectives 3, 4, 5, 6, 7 and 18.

SA recommendation 2: policy H5 include as new clause 'be designed to support an appropriate balance of informal social activity and play opportunities for various age groups'.

Policy response: Accepted. The above text has been added as H5(c)(vii).

- 5C2.27 Policy H9 Hostels and houses in multiple occupation (HMOs) and H10 Gypsy and traveller needs requires new hostels and HMOs to be accessible to services and community facilities; and new gypsy and traveller sites to be accessible to health services. Policy H11 seeks to ensure an appropriate mix of units and external amenity space in accordance with policy H5. These housing policies are considered to have an overall positive effect on SA Objective 2.
- 5C2.28 Overall it is considered all housing policies contribute towards delivery of more and improved quality (warmer, safer and healthier) housing and more genuinely affordable housing in the borough. Policies seek to improve conditions for the disproportionate number of people, often BAME, older people and lower income people living in Lambeth's older housing stock.
- Economic development policies ED1 – ED5, ED7 – ED11, ED12, ED15***
- 5C2.29 One of the biggest influences on people's health is employment. The Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 has a number of policies which either directly or indirectly seek to improve the economy of the borough, get residents working and thereby create conditions that improve health and reduce health inequality. Employment has a strong bearing and effect on mental health. The provision of a range of employment opportunities helps ensure people have access to suitable employment and are likely to remain mentally, physically and emotionally healthier by having steady income. Economic development policies (ED1 – ED4 in particular) seek to safeguard existing business use/employment generating land, and provide affordable workspace in various locations across the borough. This will likely result in positive effects on mental health and well-being of local residents as it helps to improve access to local jobs for local people. Improved vitality and viability of town centres (policy ED7) should also result in positive effects on mental health and wellbeing, through employment opportunities, access to services and facilities, and sense of place. New residential development on appropriate sites in town centres further maximises positive effects for health through for example access to jobs, services and facilities, access to healthy food, reduced need for travel. Controlling the number of A2 uses, betting shops and payday loan shops also provides benefits for improved health in Lambeth by reducing negative impacts on vitality and viability of town centres and the secondary effects on health and enjoyment of place this may create. Policy ED15 on employment and training seeks to reduce unemployment in the borough by supporting job opportunities and apprenticeships associated with major developments in the borough, and provision of employment and training schemes. It is considered that these policies are likely to generate positive secondary effects in relation to health and sense of community identity and civic participation.
- 5C2.30 ED policies support the vitality and viability of town centres including shopping, leisure, food and drink, markets and entertainment which all help to maintain

community spirit and social interaction and offer local employment opportunities, improving mental and emotional health and wellbeing. Policy ED8 (evening economy and food and drink uses) protects amenity of residential areas and sensitive uses, and impacts on community safety from adverse impacts arising from evening economy (e.g. noise and nuisance). It limits these uses to town centres and the Central Activities Zone retail cluster. The policy also states that proposals for hot food takeaways (A5 uses) will not be permitted if proposed within 400m of the boundary of a primary or secondary school. Proposals for drive-through takeaways are not permitted in any location of the borough. This should contribute positive effects for air quality and also in terms of tackling obesity, in so far as how planning can achieve this goal. For example, it does not address other fast food eating establishments that can contribute to obesity but do not fall within A5 use class (such as A3 uses like McDonalds or KFC restaurant; or sale of fast food donuts, ice cream or other unhealthy food (A1)); but it is accepted that using the term “fast food” in the Local Plan would be open to interpretation – and the council could not (and would not wish to) control the sale of particular food items (e.g. donuts and ice-creams) from A1 or A3 premises. In accordance with Draft London Plan policy E9, proposals for A5 uses may be conditioned to require the operator to achieve and operate in compliance with the Healthier Catering Commitment standard.

- 5C2.31 Protection of public houses (policy ED9) can contribute to positive health through their role in social interaction, local community life, sense of place and provision of local employment. In so far as planning policy can influence; it is considered that these benefits outweigh any negative effects to resident’s health that may arise through alcoholism and binge drinking. These negative effects can also arise through sale of alcohol from A1 retail units, of which specific consumer goods are not within the control of planning policy, so therefore it is considered that policy ED9 can have a positive effect on SA Objective 2.
- 5C2.32 Policy ED10 is considered to have a positive effect on SA Objective 2 by limiting betting shops and payday loan shops in the borough. As per the positive effects on SA Objective 1, policy ED10 is considered to have flow-on positive effects on SA Objective 2 by reducing the causes of ill health, particularly mental health, through gambling. The managed effects of such uses on amenity and crime will further contribute to a healthier borough with less stress and concern over crime and anti-social behaviour levels. While it is noted that policy ED10 will likely result in positive effects for Lambeth in regards to limiting A2 uses, betting shops and payday loan shops and the relationship to crime and anti-social behaviour, it is acknowledged that this may, in some cases, result in displacement of demand and impacts on neighbouring boroughs. This can be acknowledged in the Statements of Common Ground with neighbouring boroughs. Policy ED12 on markets provides opportunity for sale of fresh fruit and vegetables and likely increases the accessibility to affordable nutritious and varied foods.
- Social infrastructure policies S1 and S2**
- 5C2.33 Significant positive effects are likely to result from policies S1 (Safeguarding existing social infrastructure) and S2 (New or improved social infrastructure). These policies make provision for community facilities which include D1 and D2 use classes as well as other public service uses such as fire, ambulance, policing, and community safety facilities, all of which are necessary components to a healthy borough. Where new provision is proposed these will be conveniently located and accessible for their intended use, easily reached by foot, cycling or public transport and fully accessible to all sections of the community (including people with disabilities and older people) thereby helping to reduce health inequalities. Ideally, social infrastructure should be

located where there is an identified need that helps reduce health inequalities in order to better address baseline conditions of community facilities being unevenly spread across the borough with some neighbourhoods experiencing severe shortages or useable space, while others have under-used facilities. However it is accepted that this ultimately rests with infrastructure providers, and there are identified projects in the Infrastructure Delivery Plan.

5C2.34 It is considered that policy S2 fully seeks to reasonably maximise accessibility to new sports and leisure facilities (D2 uses). This supports improved physical and mental health of local people. SA recommendation 13 on the DRLLP has been accepted in part in the DRLLP PSV. Policy ED14 has been amended to include a new policy clause as follows: 'All new hotels will be expected to provide business facilities. The potential for leisure within hotels to be made available for public use in locations where there is an identified shortage or provision should be explored'. However, no change was made to policy H13 large-scale purpose-built shared accommodation as a result of SA recommendation 14 as the public use of leisure facilities intended for residents is not considered a reasonable policy requirement for this type of development. The response it noted, understood and considered appropriate given the intended user groups for this type of accommodation and the inappropriateness associated with making leisure facilities as part of a primary residence available for general public use.

Transport and communications policies T1 – T6 and T9

5C2.35 It is considered that policies T1, T2 and T3 will likely result in significant positive effects as these policies minimise the need to travel, reduce dependence on the private car, support the Mayors Healthy Streets Approach and Lambeth's Healthy Routes Plan, prioritise walking and cycling, and seek to provide attractive and useable environments which are conducive to safe walking and cycling. These policies should help reduce congestion, air pollution, and encourage more active travel, therefore contributing to improved health (both mental and physical) of the borough. In response to SA recommendation 17; policy T2 has been updated to strengthen achievement of a more healthy borough by adding reference to making walking a *healthier* form of travel, thus positively contributing to SA Objective 2. There is strong evidence that reductions in traffic to reduce air pollution are successful in improving health. Equally however, it is recognised that increased population growth is expected over the plan period, and if there is an associated increase in number of vehicles in the borough, effects on air quality may not necessarily be favourable (it is recognised electric vehicles are encouraged). Policy T2 on walking seeks to ensure the physical environment in Lambeth, including all streets, is fully accessible to all. Policy states that provision for pedestrians should be inclusive and prioritise those with particular mobility needs. This helps to reduce health inequalities by making walking more attractive and possible to all, helping people live an inclusive and active lifestyle.

5C2.36 The intentions of policy T3 cycling in the DRLLP were welcomed but noted as overly ambitious/unrealistic. Clause (c) stated that 'Lambeth will ensure that people who want to cycle are able to do so and are not discouraged by road danger concerns'. This statement was considered to be a big and potentially unachievable claim as it is not something any organisation can 'ensure'. Until a critical mass of cyclists is achieved, together with appropriate cycle lanes and other safety measures, there will be the potential for accidents. In order to help alleviate this, the behaviour of all road users, especially private and commercial vehicles, must improve. As a result SA recommendation 15 on the DRLLP has been incorporated. Policy T3, clause (c) has been softened to make the policy more achievable, amending the text to now read that 'Lambeth will help to enable people who want to cycle are able to do so and not

be discouraged by road danger. It is noted that supporting text says 'Lambeth's Transport Strategy aims to ensure that anyone who wants to cycle is able to do so easily...'. Together, the amended policy and supporting text will result in positive effects on the promotion of a healthy borough, thus supporting SA Objective 2. Furthermore, in response to SA recommendation 17, policy T3 has been strengthened by adding reference to making cycling a *healthier* form of travel, as well as helping to ensure that people who want to cycle are not discouraged by *air quality* concerns. Policy T3 clause (f) has been amended to strengthen the cycle parking spaces requirement. An additional requirement for the provision of a minimum 3 years free membership of the Cycle Hire scheme for each dwelling in new residential development has been added to clause (h), further encouraging residents to utilise active transport measures such as cycling as an alternative means of travel, thus helping to reduce the causes of ill health through exercise. These additions also considered to positively contribute to achieving SA Objective 2.

5C2.37 SA recommendation 16 on the DRLLP stated that the policy team may wish to revisit the wording of policies T2 and T3 with reference to 'greater priority' that will be given to each pedestrians and cyclists 'in the use of road space'. It was unclear whether this meant greater priority than what is currently provided, or 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 responded that 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. To clarify this further, a minor change in the DRLLP PSV 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. Policy T2 (b) states that: 'In line with the hierarchy set out in T1(c), Lambeth will promote walking by giving greater priority to pedestrians in the use of road space, introducing appropriate motor traffic management measures, reducing road danger from other transport modes and through improvements to signage and way-finding.' Policy T3(d) states that: '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'. This is considered appropriate to address SA recommendation 16 and provide positive effects on SA Objective 2.

5C2.38 Supporting paragraphs 8.9 and 8.14 state that walking and cycling are healthy forms of transport. In itself, this is true, and each does contribute to a degree of improved health through a more active lifestyle. However, walking and cycling in Lambeth is not always healthy due to very high levels of air pollution with significant adverse effects on health, particularly for more vulnerable groups of the community. As a result of the recommendation on the DRLLP, and as stated in paragraph 5C2.36, SA recommendation 17 has been incorporated to consider the impact air quality has on health. Policies T2 and T3 have been updated to strengthen reference to promoting a healthy borough through inclusion of the word 'healthier', and air quality impacts have been added to policy T3 to help ensure that concerns over poor air quality are not a deterrent for pedestrians and cyclists. In the SA on the DRLLP 2018 it was noted that there were no references to air quality in the transport section of the draft Plan. As a result of SA recommendation 17, references to air quality concerns and the contribution that vehicles, including freight vehicles, have to poor air quality has

also been included. While Draft London Plan policy S11 Improving air quality applies, it is considered that these additions positively achieve SA recommendation 17 and SA Objective 2, whilst also supporting more effective achievement of SA objectives 7 (liveability) and 15 (air quality) and better aligning with policy EN1(c)(iii) of the DRLLP PSV 2020.

- 5C2.39 Improvements to public transport infrastructure (policy T4) are proposed to address both public transport accessibility and capacity and therefore, if and when delivered, will result in positive effects in terms of SA Objective 2 by improving access to other services, facilities and employment which will contribute to improved mental, emotional and physical health and wellbeing, as well as help reduce poverty. Policy T4 also provides that any improvements or new public transport infrastructure will also need to be designed to be safe, convenient and accessible for use especially by people with disabilities, children and cyclists.
- 5C2.40 Policy T5 River transport contains provision for access to the River Thames which can provide a good walking, running and cycling route, as well as mental health benefits associated with access to water and open space. The DRLLP PSV includes additional supporting text to make clear that developments in proximity to the Thames should consider utilising the river for the transportation of construction materials and waste, including through the use of nearby Safeguarded Wharves in the neighbouring London Borough of Wandsworth. This contributes to improving local air quality and making roads more safer for all users, thereby positively contributing to SA objective 2, as well as SA objective 4, 7 and 9.
- 5C2.41 A reduction in car ownership and private car trips is promoted in policy T7 parking. The maximum residential car parking standards set out in Draft London Plan policy 6.1 will apply, except for areas of PTAL 1 and 2 where Lambeth will apply fewer spaces per unit than the London Plan. Essentially for Lambeth this means the CAZ, Waterloo and South Bank and Vauxhall opportunity areas, Brixton and Streatham town centres and all areas of PTAL 4-6 will be car-free. PTAL 2 and 3 areas are permitted to have up to 0.25 spaces per unit and PTAL 1 areas may have up to 0.5 spaces per unit. These limits to car-parking should improve residential amenity, reduce road danger in residential streets and contribute to healthier lifestyles through improved air quality and promotion of walking and cycling (although it may be challenging for people who need a vehicle for their employment).
- 5C2.42 Health considerations have been included in policy T9 on telecommunications as there will need to be compliance with the International Commission on Non-Ionising Radiation Protection guidelines on the limitation of exposure of the general public to electromagnetic fields. Support for high quality digital infrastructure helps enable working from home opportunities and provided broadband connection fees and access are affordable, it helps reduce poverty, including child poverty and the impact of income inequality. Making digital infrastructure as commonplace to all households as water, sewerage, electric and gas infrastructure is a good starting point of reducing inequalities affecting children and their future employment prospects.
- Environment and open space policies EN1 – EN5 and EN7***
- 5C2.43 Policy EN1 will result in positive effects on SA Objective 2 as it seeks to protect and maintain open spaces and green infrastructure, and require major developments in areas of open space deficiency and/or areas of access to nature deficiency to provide on-site open space/access to nature improvements or make financial contribution to enable new open space or improvement to accessibility and quality of existing public open space. Access to green and open spaces is essential for physical and mental health. It is known that people living within 500 metres of a park

or green space are around 25% more likely to achieve recommended levels of regular physical activity (Lambeth BAP 2019). Improvement and maintenance of such spaces and the provision of green infrastructure will also encourage the increased use of spaces, making them feel safer (benefiting a number of protected equality groups) whilst being healthier, attractive places. Free and safe access to parks and green spaces has been shown to significantly reduce levels and severity of mental illness in local populations. This effect is markedly enhanced by increased access to nature and natural spaces, especially if well managed and promoted for their health benefits (Lambeth BAP 2019). It is considered that policy EN1 achieves this. Application of the urban greening factor in major developments will help provide significant positive effects on health and well-being for users and occupiers of the site, and for those adjacent to the site. The ability to see green infrastructure, let alone access it, contributes to a sense of well-being and has beneficial health and environmental amenity impacts. The protection of public and private space for its value in providing health and wellbeing is important in contributing to SA Objective 2, as is the improved health benefits that the provision of green infrastructure, such as green spaces, street trees and green roofs, provides.

- 5C2.44 The SA on the DRLLP established that, the loss of existing ground floor public open space with replacement at roof level is not considered to be of equivalent quality, regardless of access arrangements. Loss of green and open space at street level will have adverse effects on health and well-being, giving rise to feelings of urban claustrophobia and the cumulative effect over time would result in significant negative effects. Green open space at street level provides feelings of openness in otherwise urban concrete environments and more effectively relieves adverse urban heat island effects, by providing cooler air at ground level. Open space at ground level is much more likely to be visually enjoyed by more people than open space at roof level, and likely to be used by more people at ground level than at roof level, due to a more perceived ease of accessibility (even if roof is fully accessible to the public). Furthermore, open space at ground level does not discriminate against people with disabilities or those with a fear of heights, and it is also considered that open space at roof level could be perceived as less child-friendly. Once open space is lost to development, it is highly unlikely it will ever revert back to open space. Accordingly, as a result of the SA on the DRLLP, SA recommendation 18 has been incorporated in the DRLLP PSV. Supporting text now states that 'Replacement of existing ground floor public open space at roof level 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'. This amendment acknowledges that the replacement of existing ground floor public open 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. Furthermore, supporting text has been amended to include reference to roofs that are fully accessible to the public as open space. These changes will result in a positive effect on the promotion of a healthy borough including reduced health inequalities and reducing the causes of ill health, thus supporting SA Objective 2.
- 5C2.45 A lack of access to affordable and nutritious food is a contributor to poor health. Policy EN2 enables access to healthy food by encouraging new allotments, orchards and local food growing spaces and production, both temporarily, where acceptable, and permanently. This will have positive effects for SA Objective 2 and a number of protected equality groups, including those with lower incomes/ socio-economic status.
- 5C2.46 Overall it is considered that Policy EN3 on decentralised energy will result in positive

health effects as it seeks to provide warm and healthy homes and developments, thus reducing the causes of ill health and poverty and positively contributing to SA Objective 2 and protected equality groups.

- 5C2.47 Sustainable design and construction highlights the mental health benefits of providing sustainable housing that at the same time contributes to improved health, for example, by providing good natural light and ventilation and mitigating impacts on health arising from construction. Policy EN4 requires all development to meet high standards of sustainable design and construction feasible. The intent of this policy should result in positive health benefits from improved building environments (i.e. reduce fuel poverty and illness related to damp conditions, draughts such as respiratory diseases and winter deaths). New build residential development is encouraged to use the Home Quality Mark and Passivhaus design standards which seek to positively impact the occupants health and well-being, reduce the home's environmental footprint and improve resilience to flooding and overheating. Non-residential developments must meet at least BREEAM 'Excellent' standard, while contaminated land requires adequate remedial treatment before development can commence which works to positively protect the health of future occupiers / users of land.
- 5C2.48 Policies EN5 Flood Risk and EN7 waste management should result in positive effects on SA Objective 2. Evidence suggests that adults who experience flooding in their homes are at risk of psychological distress. Measures to mitigate flood risk are part of building community resilience, and policy EN5 seeks to minimise the impact and mitigate the effects of flooding. Policy EN7 seeks to contribute to the sustainable management of waste in the borough, including the provision of on-site waste management facilities in all major developments This will positively contribute to SA Objective 2 by helping to reduce the causes of ill health resulting from inadequate waste management facilities. The DRLLP PSV 2020 adopts Draft London Plan policy regarding air quality and this is considered to have a positive effect on health and thus SA Objective 2.
- 5C2.49 ***Quality and Built Environment policies Q1 – Q3, Q6, Q7, Q9 - Q14, Q24, Q25***
Overall it is considered that the design policies will result in significant positive effects on the health of the borough, particularly as these seek to provide an inclusive environment, protect amenity (including privacy, daylight and sunlight), and mitigate noise, pollution or odour, disturbance and other adverse effects that can impact on mental, emotional and physical health and wellbeing. Policy Q3 seeks to create a safe borough for all through good design. Crime prevention and a feeling of safety is particularly important to mental and emotional health and it is considered that policy Q3 is likely to result in significant positive effects on SA Objective 2 by reducing some of the causes of ill health, as well as have positive effects for SA Objectives 1 (crime), 5 (equalities) and 7 (liveability). Policies Q6, Q7 and Q11 seek to ensure climate change adaptation and/or mitigation is considered in the urban design and public realm and new developments. It is considered these policies help protect some young people, some elderly and those with certain health conditions as overheated buildings and environments can be potentially lethal.
- 5C2.50 Planting of new trees and increased green infrastructure through policies Q9 and Q10 help reduce the heat island effect and will cool ambient air temperatures, thus contributing to improved health and wellbeing. Additionally, green infrastructure helps improve air quality by filtering particulates (notably PM₁₀), and the supporting text to policy Q10 notes the retention of canopy cover and additional trees in new development where it is in an Air Quality Focus Area. This is likely to help those with respiratory conditions as well as provide shade on hotter days, benefiting a number

of groups, including protected equality groups. Furthermore, it is recognised that contact with trees and vegetation can help alleviate stress and improve mental well-being, which will be beneficial for people's health. Therefore it is considered that policies Q9 and Q10 will result in positive effects on SA Objective 2 (as well as other SA Objectives such as equalities, liveability and climate change).

- 5C2.51 Policy Q12 on refuse and recycling storage makes reference to public health, recognising the potential adverse impacts on health that waste can have. Supporting text states that 'poorly designed and located, refuse and recycling storage facilities that do not cater for all, result in unacceptable environments and poor living conditions for residents. In meeting the policy requirements designers should also be mindful of the needs of people with disabilities, children and older people. Innovative approaches to optimise recycling and minimise cross-contamination will be strongly encouraged.' This contributes to achieving significant positive effects on SA Objective 2.
- 5C2.52 Policy Q13 seeks to ensure that cycle storage areas are incorporated into developments and made prominent, accessible, attractive, secure and safe to use to help increase cycling levels, thus contributing to better health and improved outcomes with regards to SA Objective 2.
- 5C2.53 Policy Q14 resists proposals for development in gardens, or land most recently used as gardens, which would result in the loss of biodiversity, loss of trees of value, poor drainage, or cause unacceptable amenity impacts. It was noted in the SA on the DRLLP that all trees may be considered to be of value with regards to improving health and well-being, including for adjacent owners and occupiers. As a result SA recommendation 19, a new definition in the glossary has been included to clarify what trees are considered 'of value'. The definition of trees of value is described as follows: 'Trees 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 canopies or have the potential to develop such in the future'. This is considered to appropriately address the SA recommendation.
- 5C2.54 It is considered that policies Q24, Q25 and Q27 appropriately benefit health outcomes where possible.
- 5C3.55 Uncontrolled and insensitively sited and designed tall buildings can have an adverse impact on health and well-being of both existing residents of adjacent areas and occupiers of tall buildings themselves through such things as less sky view and light, and privacy/overlooking concerns. It is considered that policy Q26, together with other applicable policies, for example Q2 amenity, Q5 local distinctiveness, Q7 urban design new development and relevant PN policies and applicable Draft London Plan policies (eg D8), seek to mitigate and/or avoid adverse effects arising from tall buildings. Thorough, detailed and careful application of appropriate policies will be consistently required in considering proposals for tall buildings to ensure such adverse effects are properly assessed, mitigated or avoided through the design process to effectively achieve SA Objective 2, as well as other SA Objectives like liveability. See also para 5C2.59 below.

Places and Neighbourhoods Policies PN1 – PN11

- 5C2.56 In combination with other DRLLP PSV 2020 policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN11) should result in significant positive effects in relation to SA Objective 2. In particular policy PN1 on Waterloo and

South Bank will result in significant positive effects with support for the development of a MedTech health cluster by supporting the strategies of St Thomas' Hospital, Guy's and St Thomas' Trust and Kings College London to achieve new health facilities.

- 5C2.57 The whole borough is designated an air quality management area. As a result of the SA on the DRLLP, SA recommendation 20 has been incorporated in the DRLLP PSV 2020. Previously, the improvement of air quality (a determinant of health) was only mentioned in the Waterloo, Vauxhall, Streatham, Stockwell and Kennington policies, with air quality only mentioned in the short summary of characteristics and challenges for Brixton, but not within the actual policy, despite part of Brixton being within an air quality focus area. Air quality was not mentioned at all in either the short summaries or policies for Clapham, West Norwood, Herne Hill, Loughborough Junction or Upper Norwood. Given the health benefits of improved air quality, and taking into account the whole borough is an air quality management area and that air quality does not respect spatial boundaries; the policies and supporting text were amended to ensure the improvement of air quality is appropriately recognised and addressed in each PN policy. These changes will result in a positive effect in improving health outcomes and improving air quality
- 5C2.58 It was noted on the DRLLP that not all places and neighbourhoods policies sought a reduction in traffic or improved traffic and environmental conditions for pedestrians and cyclists. The desire to reduce traffic dominance in West Norwood was expressed in the short summary of characteristics and challenges, but there was no mention of this in policy PN7, nor was there any mention of improvement for pedestrians or cyclists. In Herne Hill policy PN9 and Loughborough Junction policy PN10 there was reference to pedestrians and cyclists but not traffic reduction. Furthermore, it was noted that Loughborough Junction has one of the lowest levels of car ownership in the country, and that most residents walk and cycle to get around the area – so traffic may not be a significant issue for this place. Therefore, SA recommendation 21 on the DRLLP suggested that 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, as there is strong evidence that suggests interventions to change traffic conditions (such as cutting speed limits) reduce road accidents, and that reductions in traffic to reduce air pollution are successful in improving health (SA recommendation 21). As a result of this recommendation on the DRLLP, PN7 and PN9 have been reviewed and updated to appropriately reference a desired reduction in traffic dominance/congestion and improvement in walking and cycling levels. The additions are considered satisfactory in addressing the recommendation and will result in positive effects on SA Objective 2 as well as other SA Objectives such as climate change, air quality and liveability.
- 5C2.59 The Clapham policy seeks to control the number of food and drink uses in the town centre which should result in more positive health impacts in terms of mental health and well-being for residents who are affected adversely by evening economy effects (such as anti-social behaviour and noise). The policy also does not permit any additional A4 uses (pubs and bars) or hot food takeaways (A5) in the area which may have some positive impact on the physical health of local residents. Although it is considered that more positive impact is likely to come from increased feelings of sense and pride of place (from better control of evening uses).
- 5C2.60 Policies PN1, PN2, PN3, PN4, PN7 and PN8 promote mixed use developments and tall buildings. High rise residential tower blocks do not necessarily create neighbourliness and are not always good for all residents. Literature suggests high rises are less satisfactory than other housing, in particular for children, as social

relations are more impersonal, increased fear of crime and may contribute to suicides. High rise housing is more satisfactory for residents when they are more expensive and people have chosen to live there. Concentrations of high rise office accommodation in mixed use residential schemes has the potential to leave space empty for parts of the week which may isolate residents from local services and amenities as well as social interaction. An appropriate balance between uses will need to be achieved to avoid adverse impacts on health and wellbeing.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

5C2.61

Overall, and taking into account the appraisal prompt questions and targets set out in Sustainability Framework, it is likely that the Revised Lambeth Local Plan Proposed Submission Version will have a significant positive effect on the existing baseline and in improving conditions and services that engender good health and reduce health inequalities, in so far as the planning framework allows.

Table 9: Summary assessment of effects of DRLLP PSV on health objective

Assessment of effects of DRLLP PSV 2020 on SA objective 2	Score	Justification of Score	Timescale and probability	Permanent or temporary
Promoting a healthy borough with better healthcare services, reduced health inequalities and by reducing the causes of ill health	++	<p>There are three pillars of health that planning can consider. First, health improvement considerations relate to factors that increase physical and mental wellbeing. These include initiatives to encourage walking and cycling, green spaces, social interaction and employment. Second, there are health protection considerations – things that mitigate negative impacts such as air, noise, water and ground pollution. Third, there are health infrastructure considerations, including the provision of facilities such as doctors' surgeries, hospitals, clinics and pharmacies. All these considerations should be tailored to local needs, and it is considered that the DRLLP PSV provides the policy framework to achieve positive planning for health.</p> <p>Health is influenced by a wide range of factors, many of which are beyond the remit of a Local Plan. However, to the extent that local planning policy can play a part, it is considered that overall the DRLLP PSV will likely have significant positive effects on the health objective and existing baseline conditions in particular increasing housing supply to help address homelessness and overcrowding, mixed housing sizes, affordability and accessibility. All housing policies contribute towards delivery of more and improved quality (warmer, safer and healthier) housing and more genuinely affordable housing in the borough. Policies seek to improve conditions for the disproportionate number of people, often BAME, older people and lower income people living in Lambeth's older housing stock. Positively, many SA recommendations have been made and accepted through the planning making process to improve outcomes for health and reduce health inequalities.</p> <p>One of the biggest influences on people's health is employment. The DRLLP PSV has a number of policies which either directly or indirectly seek to improve the</p>	Improvements in terms of providing additional housing, attracting and supporting employment and business investment, enabling local provision of health services, access to open space and encouraging open space in areas of current open space deficiency, improving air quality and public transport improvements are likely to be seen in the medium to long term. To reflect in actual health of residents will likely be a long term measure.	Permanent

		<p>economy of the borough, get residents working and thereby create conditions that improve health and reduce health inequality.</p> <p>The transport policies seek to improve health directly through active travel, improved air quality (from reduced private vehicle use) and indirectly through improvements to public transport infrastructure that can improve accessibility to employment, services and facilities.</p> <p>Protection and enhancement of open spaces and increased urban greening will also result in positive effects on health both physical and mental.</p> <p>Increased population growth and construction over the plan period may result in increased vehicle movements and associated negative impacts on air quality. However, it is considered that policies seek to minimise private vehicle use, encourage sustainable travel modes (including river freight) and control dust and emissions. It is otherwise DRLLP PSV policies will make a significant contribution to, and appropriately address, the sustainability issues pertinent to Health and Well Being (and Equalities and Accessibility) for the borough outlined in the sustainability framework (Table 4).</p>		
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Recommendations for monitoring likely significant effects

5C2.62

It is recommended that the following indicators are used to monitor the effects of the Revised Lambeth Local Plan Proposed Submission Version identified in the SA:

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

5C3 ACCESS AND SERVICES

5C3.1 This section of the SA relates to the sustainability performance of the DRLLP PSV 2020 against:

- Objective 3: Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.

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

Relevant policy objectivesNational Level

5C3.3 Accessibility is incorporated into a number of policies of the *National Planning Policy Framework 2019*. For example, paragraph 127 states the planning policies should ensure developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. Paragraph 87 states when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well-connected to the town centre; and paragraph 91 states that planning policies should aim to achieve healthy, inclusive and safe places which are safe and accessible (in terms of crime), and in terms of health 'enable and support healthy lifestyles,...for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling'. Paragraph 92 states planning policies should provide the social, recreational and cultural facilities and services the community needs and amongst other things guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; and ensure an integrated approach to considering the location of housing, economic and community facilities and services.

Regional Level

5C3.4 A number of different policy areas address accessibility in the *Draft London Plan*, for example related to strong inclusive communities, transport, housing, town centres. Policy GG1 building strong and inclusive communities seeks to provide access to good quality community spaces, services and amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation; SD6 town centres and high streets strives for vitality and viability of London's varied town centres, building strong, resilient, accessible, inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses; delivering sustainable access to a competitive range of services and activities by walking, cycling and public transport; and policy D5 on accessible housing.

Local Level

- 5C3.5 The *Lambeth Borough Plan 2016 – 2021* sets out three priorities: creating inclusive growth, reducing inequality, and building strong and sustainable neighbourhoods. The Plan contains a number of goals and ambitions to achieve these priorities that also help create an environment that is accessible to and fully inclusive for all people. In 2019 a report was published to include 20 new goals for the council and Lambeth First Partnership to work towards. These involve building local economies to generate prosperity and opportunity; investing in people and neighbourhoods to strengthen community resilience; working with partners to reform public services to provide care and promote independence; and maintaining the quality of the physical environment to improve wellbeing and encourage investment.
- 5C3.6 The *Lambeth Transport Strategy 2019* sets out the council's strategic vision for transport in the borough. It's vision is to provide a transport network that is inclusive and has a positive impact on quality of life and the environment, helping deliver more homes and jobs and ensuring long term sustainability. Walking and cycling is prioritised as is a high quality street environment and transport network that is safe and accessible to everyone. With particular regards to SA objective 3 the Transport Strategy seeks to make Lambeth's transport network more inclusive and accessible to all and ensure the benefits of improved transport provision are shared across the whole community.

Baseline conditions and existing issues*Age*

- 5C3.7 Lambeth's age profile is heavily influenced by the borough's status as a destination for working age migrants from UK and abroad. Over half of the population is younger working aged (20-44 years), and there are relatively few children and young people under 20 - only Wandsworth, Hammersmith & Fulham, Camden, Islington, Kensington & Chelsea and Westminster have a smaller proportion of children. Lambeth has the highest number of people aged 25-29 of any London borough. Most immigrants are aged 20-24, and most out-migrants are aged 20-44. Many families leave the borough with small children. The borough has a small proportion of people aged 60+ (SOB 2016).
- 5C3.8 Box 3 below demonstrates that various ethnic groups in the borough have different age profiles.

Box 3: The various ethnic groups in the borough have different age profiles

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

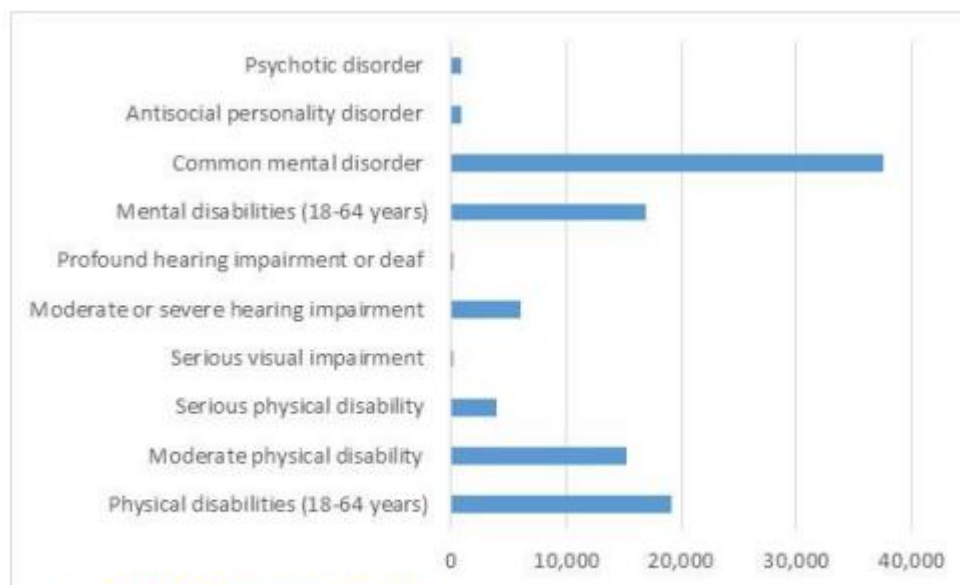
(SOB 2016)

Disability

5C3.9

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

Figure 6: predicted numbers of disabled people (2015)



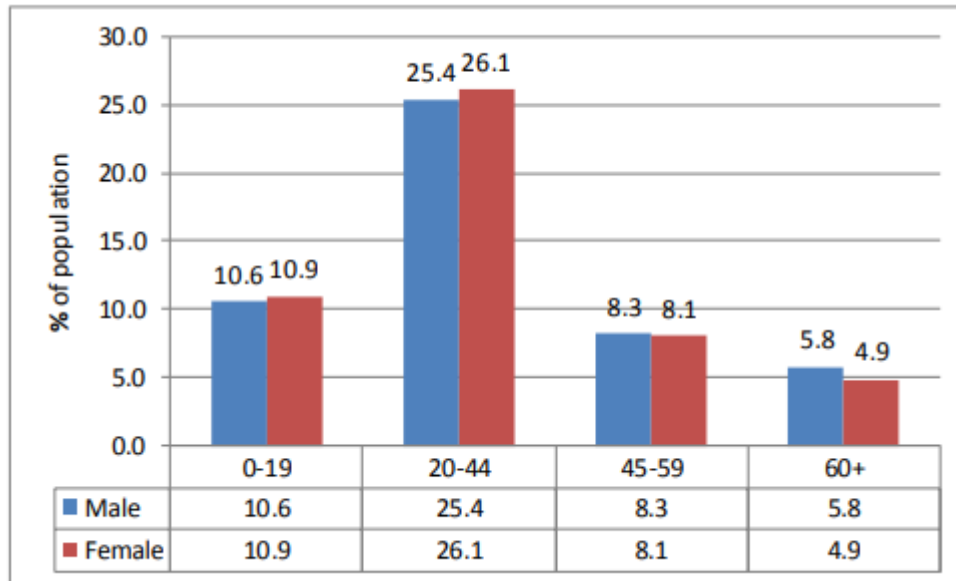
Source: [PANSI, Department of Health](#)

Gender

5C3.10

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

Figure 7: Population by gender and age

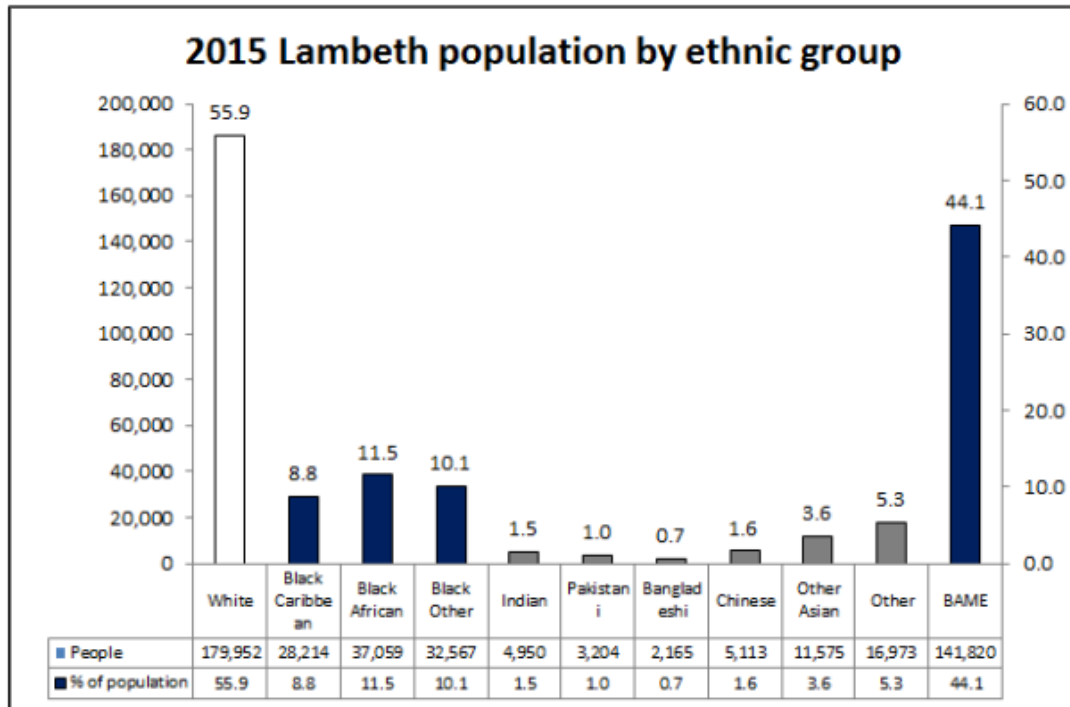


(SOB 2016)

Ethnicity

5C3.11

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



Religion

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

Transport

5C3.13 Public transport infrastructure in the borough is generally good for non-disabled people but less good for those with disabilities or access needs. There are 14 railway stations evenly spread throughout the borough and nine Underground stations, predominantly in the north. The extension of the Northern underground line extension to Battersea is under construction, which will see a new station opened at Nine Elms in 2020. Accessibility at Lambeth’s train stations is graded as poor at 8 of the 14 stations (Lambeth Transport Strategy 2019) and of the nine underground stations, only Brixton and Vauxhall are fully step free along with the Jubilee line at Waterloo.

5C3.14 Rail services in the borough are split across four franchises, the terms of which are set by the DfT; South Western, South Eastern, Southern & Thameslink. In addition TfL is responsible for London Overground and Underground services. Over the past 10 years growth in passenger numbers has been strong (Lambeth Transport Strategy Baseline Report 2017).

5C3.15 During peak periods rail services in Lambeth are currently at or over capacity, particularly services from Clapham Junction to Waterloo and Herne Hill to Victoria

(Lambeth Transport Strategy Baseline Report 2017). Investment is needed to improve conditions for passengers, to provide full access to all stations and to enable the planned increases in resident and working population.

- 5C3.16 There are many bus routes with major interchanges at Waterloo, Vauxhall and Brixton. Public transport accessibility is good in north and central Lambeth. However, residents in Streatham and Norwood are without direct access to the underground and are dependent on rail and bus connections. With bus routes focussed on the main north-south radial routes into central London and a lack of east-west services, some areas of the borough continue to have low levels of accessibility compared to the rest of Lambeth.
- 5C3.17 The proportion of households with no car or van increased from 51 per cent in 2001 to 58 per cent in 2011 (Census data ONS). Traffic congestion is an issue that is prevalent in parts of the borough. Average bus speeds have suffered in recent years due to congestion and in some parts of the borough there are problems with 'rat running' where drivers cut through residential areas to avoid congestion on main roads (Lambeth Transport Strategy 2019).
- 5C3.18 Lambeth has a low live-and-work ratio: only 28 per cent live and work in the borough. Nineteen per cent of residents commute to Westminster and seven per cent commute to the City (Destinations 2020, Mayor of London August 2010). Commuting by different modes varies across different parts of the borough with between 55.3 and 66.9 per cent of community trips being made by public transport, which is higher than the national average (Transport Strategy Baseline Report 2017).
- 5C3.19 The borough also benefits from river transport, both for passengers and transporting freight. There are two Thames Clipper stations in the borough.
- Open Space*
- 5C3.20 The total area of open space in Lambeth is just less than 844 hectares, representing 31 per cent of the area of the borough. With population increases since 2001, the amount of unrestricted open space per head of population has been reducing and in 2011 stood at 1.48 hectares per 1000 people (Lambeth Green Infrastructure Strategy 2016).
- 5C3.21 In 2016, Greenspace Information for Greater London (GiGL) prepared maps of deficiency for three different types of open spaces (local, small and pocket parks; district parks and metropolitan parks) in the borough. This identified that around one third of the borough had sufficient access to the three types of open spaces but 2% of the borough was deficient in access to all categories of open spaces – in locations near King's College Hospital and Kennington.
- 5C3.22 There are over 60 parks and open spaces in Lambeth. Sixteen parks or open spaces were awarded the Green Flag in 2019 in recognition of high environmental quality and management and access to the community. These are Archbishop's Park, Brockwell Park, Clapham Common, Eardley Road Sidings Nature Reserve, Hillside Gardens Park, Kennington Park, Milkwood Community Park, Myatt's Fields Park, Palace Road Nature Garden, Ruskin Park, St. John's Churchyard, St. Paul's Churchyard, Streatham Rookery, Vauxhall Park, Vauxhall Pleasure Garden and West Norwood Cemetery. West Norwood Cemetery is also the only council-owned burial space within the borough. Lambeth Council also owns and manages Streatham and Lambeth Cemeteries, both of which are located in the London Borough of Wandsworth.

Sports and Leisure

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

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

5C3.25 There are five nursery schools, 62 primary schools and 17 secondary schools in Lambeth. There are also five special schools, two pupil referral units and five colleges across the borough. There was a 19 per cent increase in demand for Reception places in Lambeth schools between 2009 and 2014 and Lambeth responded by adding over 500 permanent Reception places as well as over 800 temporary expansion places into schools. Lambeth built, refurbished and redeveloped schools across the borough to account for the fast-growing resident population and to meet the needs of pupils and the wider community. Overall 2,300 primary places were added during that time, the equivalent of one 1-form-entry and five 2-form-entry schools. More places are still being added as these expansions proceed through the year groups in some areas. Planned additional primary places are proposed to be added in 2021 to Wyvil Primary School in Vauxhall and Sudbourne Primary School in Brixton.

5C3.26 Lambeth has also seen significant expansion of places in recent years for secondary provision. Four new academies and free schools were created between 2012 and 2014 adding 2,725 secondary places in Years 7-11. Since then two schools have permanently expanded and Woodmansterne opened a 5 form entry secondary department to become an all-through school. They opened to full capacity in September 2019. Durand Academy closed its secondary department in September 2018 bringing the total Year 7 places to 2,643 in 2019. In addition, 450 additional sixth form places and 165 additional Special Education Needs and Disabilities (SEND) places have been created.

Likely evolution without the DRLLP PSV 2020

5C3.27 In the absence of the new DRLLP PSV 2020 reliance would be had on national and London Plan policies. However, there would be a high risk that local context would be lost and the focus on specific areas requiring improved accessibility (for example, improved transport accessibility east to west of the borough) may diminish. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of DRLLP PSV 2020 Policies

5C3.28 This section examines the likely significant effects of implementing the DRLLP PSV 2020 policies on SA Objective 3, access and services. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.

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

D1 – Delivery and monitoring	SI2 – New or improved social infrastructure
D2 – Presumption in favour of sustainable development	SI3 - Schools
D3 – Infrastructure	T1 – Sustainable travel
D4 – Planning obligations	T2 – Walking
H1 – Maximising housing growth	T3 – Cycling
H2 – Delivering affordable housing	T4 – Public transport infrastructure
H3 – Safeguarding existing housing	T5 – River transport
H4 – Housing size mix in new developments	T7 – Parking
H5 – Housing standards	T9 – Minicabs, taxis, private hire and ride hail services
H6 – Residential conversions	EN1 – Open Space, green infrastructure and biodiversity
H7 – Student housing	EN2 – Local food growing and production
H8 – Housing to meet specific community needs	Q1 – Inclusive environments
H9 – Hostels and houses in multiple occupation	Q6 – Urban design: public realm
H10 – Gypsy and Traveller needs	Q16 – Shop fronts
H11 – Estate regeneration	Q24 – River Thames
H12 – Build to rent	PN1 – Waterloo and South Bank
H13 – Large-scale purpose-built shared living	PN2 – Vauxhall
ED7 – Town centres	PN3 – Brixton
ED8 – Evening economy and food and drink uses	PN4 – Streatham
ED9 – Public Houses	PN5 – Clapham
ED11 – Local centres and dispersed local shops	PN6 – Stockwell
ED14 – Hotels and other visitor accommodation	PN7 – West Norwood/Tulse Hill
SI1 – Safeguarding existing social infrastructure	PN8 – Kennington/Oval
	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace

Delivery and monitoring policies D1 – D4

5C3.30 Policies D1- D4 will contribute towards the attainment of SA Objective 3 through working with a range of partners, delivering regeneration defined in Opportunity Area Planning Frameworks and local areas master-plans, including promotion and maintenance of mixed, balanced and diverse communities, ensuring maximum accessibility for disabled people and child friendly environments. The council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth that result in inclusivity of the borough. Section 106 funding will provide or fund local improvements to infrastructure, including access to facilities.

Housing policies H1 – H13

5C3.31 Maximising housing growth and associated population growth will place additional demand on existing services, leisure and amenities in the borough and provision for social infrastructure will need to be appropriately planned. However overall it is considered that policies H1- H5 will result in positive effects on SA Objective 3. Policy H1 maximises housing growth, policy H2 makes provision for affordable housing and policy H3 seeks to safeguard existing housing (including affordable), all of which seek to provide increased accessibility to housing. Policy H1 seeks to optimise

residential density following the design-led approach set out in Draft London Plan policy, and having regard to connectivity and accessibility by walking, cycling and public transport and the capacity and quality of provision of surrounding infrastructure; all of which work to create an environment where key services and facilities are accessible. Policy H4 provides for a range of housing sizes from one bedroom units to 3-bed units and more. This enables older people the option to downsize and remain in the borough or their local area, and provides provision for families with larger sized units. All developments should include a range of dwelling sizes, making the development inclusive for all types of people and enabling mixed and balanced communities. The policy also allows flexibility on size of accommodation for specialist housing needed in the borough. Policy H5 makes good provision for outdoor amenity space in residential developments and children's play space and ensure these are accessible to all regardless of tenure. Policy H6 ensures retention of family-sized homes in the borough by protecting dwellings of less than 130m² (as originally constructed) from conversion into flats. Policy H6 seems to focus on protecting streets from harmful cumulative impacts to environmental quality, local amenity and parking arising from conversion, rather than spatially recognising that some locations would be better suited to conversion into *several* flats given their proximity to services, facilities and public transport. To this end, the SA on the DRLLP recommended local plan policy consider the appropriateness of encouraging the conversion of a dwelling into more than 2 self-contained units in areas either close to town centres or with a PTAL rating of 4 or more, as this would better ensure accessibility to key services and better protect more vulnerable and/or low income groups (SA recommendation 22). In response, the policy team noted that this is addressed by Draft London Plan policy H2A (2) but proposed to include reference to this in the supporting text. It is considered this is an appropriate signpost to Draft London Plan policy and addresses SA recommendation 22 and positively contributes to SA Objective 3 as well as help protected equality groups.

- 5C3.32 Policy H7 is on student housing and clause (a) (v) states that student housing should be 'located in an area with good public transport access, and easy access to local shops, workplaces, services and community facilities'. It also states that leisure facilities within purpose-built student accommodation should be made available for public use in location where there is an identified shortage of provision; and that this will be secured through planning obligations. This helps improve accessibility to such facilities and will likely result in positive effects on the achievement of SA Objective 3.
- 5C3.33 It is considered that policy H8 will result in significant positive effects for SA Objective 3. It aims to provide suitably designed and located housing options for vulnerable groups, including the elderly, and contribute to creating mixed, balanced and inclusive communities. The policy provides for 'adequate provision for parking for visiting health and care professionals' and where appropriate the safe storage of wheelchairs and mobility scooters. The SA on the DRLLP noted that the provision of car parking for visitors and carers under policy H8 had been removed from adopted Local Plan 2015 policy. The SA on the DRLLP noted that arguably, those in specialist housing care need 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. The SA therefore recommended that policy team revisit this proposed change to policy in light of this consideration and in terms of tackling inequalities (SA recommendation 23). In response, the policy team noted that whilst the importance of visitors was 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 adequate car parking for carers. Policy H8 clause (a)(v) has been amended to include parking for visiting 'health and care professionals', and this is similarly reflected in supporting text paragraph 5.80. The response and amendment is noted and, together with clause (a)(iv) of the policy and in the pursuit of achieving other sustainability objectives (for example 9, 12 and 15), it is considered SA recommendation 23 has been addressed and contributes positively to SA Objective 3.

- 5C3.34 Similarly, policy H9 seeks to be fully inclusive by providing for new hostels and houses in multiple occupations, which are often needed by more vulnerable groups. The policy states that hostels and HMOs should be accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers. It is considered that policy H9 should result in significant positive effects in terms of achievement of SA objective 3.
- 5C3.35 Policy H10 provides for gypsy and traveller needs. This policy aims to result in positive effects for this group and any new site proposed needs to provide accommodation from which travellers can access services and community facilities, in particular schools and health services.
- 5C3.36 Policy H11 provides for estate regeneration schemes led by the council and/or other registered providers. While this policy seeks a housing product to provide social and health benefits, some estate regeneration schemes may be located in areas with poor access to necessary social infrastructure, for example GP surgeries, nurseries, community meeting space. A consideration to improve accessibility to services and facilities could be to make provision for such services where accessibility is poor. Policy S2 is noted as being applicable, albeit not in the policy text, however this appears to only apply to meet the *additional* need that will arise, and would not apply where housing is replaced through regeneration. The SA on the DRLLP recommended this be further considered, particularly for large-scale estate regeneration schemes that do not result in additional units (SA recommendation 25). As a result of this recommendation, a cross reference to policy S2(d) has been added to the supporting text to H11. Estate regeneration schemes will fall within the requirements placed upon proposals for more than 25 residential units.
- 5C3.37 Policy H12 build to rent provides another housing product that helps improve accessibility to housing, particularly for low income groups. Similarly, Policy H13 on large-scale purpose-built shared living may provide a housing option for those on lower/average incomes, those seeking to downsize, or those seeking social interaction.
- Economic Development policies ED7 – ED9, ED11, ED14***
- 5C3.38 Policy ED7 supports the vitality and viability of Lambeth town centres including safeguarding local shops and other local services to meet community need within neighbourhoods. Evening economy and food and drink uses (policy ED8) using pavement space need to consider accessibility by arranging such use so as not to be a hazard to people with disabilities, older people and families with small children. Stopping up of public highway to provide outdoor seating areas will be resisted, especially in town centres. Policy ED11 seeks to support and protect local centres and local shops in meeting day-to-day needs of communities. Loss of dispersed local shops will only be supported where essential daily goods are within a reasonable walking distance (400m), thereby seeking to maintain accessibility for all and reduce

the need to travel. Policy ED14 on visitor accommodation is commended, particularly clause (e) which requires all new visitor accommodation to meet the highest standards of accessibility and inclusions, as well as submission of an Inclusive Design Statement with all applications for such accommodation. This is considered to positively contribute, along with policies ED7- ED9 and ED11, to SA Objective 3 by ensuring that everyday local services are accessible and fully inclusive to all.

Social Infrastructure policies S1 – S3

5C3.39 Overall it is considered that policies S1 (safeguarding existing social infrastructure), S2 (new or improved social infrastructure) and S3 (schools) will likely result in significant positive effects on the attainment of SA Objective 3 as these seek to protect existing community facilities and ensure new community premises are accessible to the community. Policy S2 seeks to ensure social infrastructure keeps pace with population growth by making provision for social infrastructure to meet additional need resulting from development. Clause (d) states that ‘new social infrastructure should be made available to all residents irrespective of tenure’. It further states ‘if it is not possible or effective to meet the additional need through provision of new social infrastructure *on site*, a payment in lieu will be sought...’ (emphasis added). SA recommendation 26 on the DRLLP noted that it was not clear why new social infrastructure need be provided on-site (particularly for schemes of, for example, 26 residential units) The SA considered that 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 (Infrastructure), 5 (Equality), and 7 (Liveability). The same argument may apply to clause (c) of the policy on childcare provision in residential developments of more than 500 units. It was recommended this be revisited by the policy team. No change has been made as a result of this SA recommendation as the policy team noted that this part of the policy is specific to very large applications and requires on-site provision where existing facilities in the area cannot meet the additional need or demand. The policy team responded that it is not generally realistic and/or reasonable to expect an applicant to create new off-site provision on land they do not own. The policy response is noted and accepted. Furthermore, policy S2 clause (d) states that if it is not possible to meet the additional need through the provision of new social infrastructure on site, a payment in lieu will be sought to contribute towards additional service provision in existing facilities. Overall, this is considered to appropriately address SA recommendation 26 and positively contribute towards SA Objective 3.

5C3.40 Policy S3 supports proposals for new primary and secondary schools, or for the extension or expansion of existing schools to ensure demand is met and access to key education needs is available.

Transport policies T1 – T5, T7 & T8

5C3.41 The Transport Strategy 2019 that underpins the transport policies, has a strong focus on inclusive and accessible transport network. Generally, it is considered that the DRLLP PSV transport policies seek to achieve significant positive effects in providing a physical environment, including all streets, that is fully accessible to all, prioritising those with particular mobility needs; improving accessibility to key services and facilities, and reducing the need to travel, although there is some uncertainty to timescales and funding in delivering some transport projects. New public transport infrastructure to address low levels of accessibility in some areas of the borough, and improvements to existing infrastructure to be more accessible for use by people with disabilities and young families will likely be long term achievements, and rely on securing significant levels of funding. Accordingly, deliverability for some projects (in particular those not listed in the Infrastructure Delivery Plan or TfL business plan, and

those listed but with unknown funding) will likely be a barrier to some extent (at least in the short to medium term), in best achieving SA Objective 3 and for some projects it is uncertain whether such infrastructure will be delivered with expected population growth.

5C3.42 Policy T4, clause (a) (ii) has been amended in the DRLLP PSV to include reference to the facilitation/delivery of step-free access at Waterloo and Vauxhall rail and underground stations which will positively contribute towards creating an environment that is accessible to all and fully inclusive. Step-free access enables people with disabilities or those with mobility requirements, including the elderly and parents with children in pushchairs to utilise local and convenient public transport, thus improving accessibility to key services and facilities. This addition also positively supports SA Objective 5 (equality and diversity) by ensuring equitable and improved access for all, including those with protected characteristics.

5C3.43 SA recommendation 27 on the DRLLP suggested that 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, noting that Draft London Plan standards appear to only cover residential, office, retail and hotels and leisure uses. A minor change was made as a result of this recommendation (and SA recommendation 23). Policy H8 (a)(v) allows for parking for visiting health and care professionals. For other uses, the policy team responded that London Plan policies are appropriate to Lambeth and any relaxation in standards would not be justified. On balance, and taking into account achievement of other sustainability objectives, this response is accepted.

Environment and green infrastructure policies EN1 and EN2

5C3.44 It is considered that policies EN1 and EN2 should result in positive effects on SA Objective 3 as they seek to improve access to open space and healthy food. The provision of green infrastructure and open space in the vicinity of developments helps improve access to green open spaces and wildlife habitats for all users. Financial contributions will also be sought based on the measures required to improve access to open space, including path improvements.

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

5C3.45 Policy Q1 inclusive environments is an important policy and is considered to have significant positive effects with regards to achieving SA Objective 3. The policy seeks improvements to the existing accessibility provision and inclusive design statements to show how development proposals will achieve inclusive design for all, including people with disabilities, older people, other people with mobility constraints and children.

5C3.44 Overall it is considered that policy Q6 urban design: public realm provides for an accessible inclusive environment, through for example, 'safe, attractive, uncluttered, co-ordinated public realm...'; and 'improved legibility, permeability and convenient access via direct routes for all users...'. It is noted that clause (vii) refers to permeable paving, which gives rise to whether it would be appropriate for the policy to also make reference to paving that is easy and safe for all users to use in all weather conditions. For example, some forms of paving can get slippery in wet weather, which can be a hazard for older and younger people and persons with mobility constraints. Similarly, some paving is more difficult for wheelchair users and pushing prams and buggies. The SA on the DRLLP noted there is a council agreed standard for streetscape materials and street furniture but also recommended consideration of surface materials used and their ease of use for different protected

equality groups be revisited by the policy team (SA recommendation 28). The policy team response to the SA recommendation was that 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. The response is noted, and is considered appropriate to ensure that paving materials are user friendly for all and thus positively contributes to SA Objective 3.

5C3.46 Sometimes shop fronts and entrances can be a barrier to disabled people, the elderly and people with pushchairs particularly those within historic buildings. It is considered that policy Q16, shop fronts, somewhat provides for these groups by clause (iv) 'adequate entrance doors' and clause (vi) 'have level entrances where possible'. Coupled with other DRLLP PSV 2020 policies, in particular policy Q1, positive effects in terms of accessibility and inclusiveness regarding shopfronts should result.

5C3.47 Proposals fronting River Thames should maintain and create public accessible spaces and routes along the river for a continuous riverside walkway (policy Q24) and this is supported in terms of SA objective 3.

Places and neighbourhoods policies PN1 – PN11

5C3.48 In combination with other DRLLP PSV policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN11) should result in significant positive effects in relation to SA Objective 3. Most of the major places and neighbourhoods seek mixed used development (e.g. Waterloo and South Bank, Vauxhall, Brixton, Streatham, Clapham, West Norwood/Tulse Hill, Kennington/Oval, Loughborough Junction) and all policies seek some sort of public realm improvements such as linkages, permeability and connectivity as well as public transport accessibility and capacity improvements. As a result of the SA recommendation 29 on the DRLLP, each PN policy in the DRLLP PSV has been reviewed to ensure that public realm environments are fully accessible and/or inclusive.

5C3.49 While the places and neighbourhood policies do provide the policy framework to deliver fully accessible public transport; it is noted that until improvements to accessibility of public transport (including step-free access), and safe and accessible walking and cycling environments are actually delivered, true achievement of SA Objective 3 will not be possible. The Infrastructure Delivery Plan outlines projects to achieve necessary improvements. However, for some projects there are significant funding gaps and it is considered that this threatens the deliverability of the such improvements.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

5C3.50 Overall, and taking into account the appraisal prompt questions and targets set out in Sustainability Framework, it is likely that the DRLLP PSV 2020 will have significant positive effects albeit with some element of uncertainty on the existing baseline and ensuring that everyone has access to community services and facilities.

Table 10: Summary assessment of effects of DRLLP PSV 2020 on Access and Services

Assessment of effects of DRLLP PSV 2020 on SA objective 3	Score	Justification of Score	Timescale and probability	Permanent or temporary
Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities	+/?/-	<p>Overall it is considered that the DRLLP PSV provides the policy framework to deliver an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improves accessibility to key services and facilities (e.g. urban design of public realm and buildings, protection of town centres including local shops, protection and provision of new social infrastructure, housing and transport). However, deliverability of projects to achieve this is uncertain. The IDP identifies funding gaps for some projects (for example step-free access at Brixton, Streatham and Tulse Hill Rail Stations, to the Northern Line at Waterloo Station, and walking and cycling improvements at Loughborough Junction, Streatham Hill, and implementation of the Healthy Route Network borough-wide). Accordingly delivery of such projects is considered uncertain.</p> <p>Until such time as infrastructure projects that improve the accessibility of the environment are delivered, negative effects will continue to be experienced by some groups of the community (i.e. people with disabilities, parents and carers of young children, older people). However, given the positive policy framework to progress accessible and inclusive environments in Lambeth is within the DRLLP PSV and Draft London Plan, it is hoped that these effects would be temporary.</p> <p>To address existing baseline issues of poorer accessibility to community services for some residents in the borough; it is critical that new social infrastructure is delivered in locations to address identified need.</p>	<p>Improved accessibility of the built environment and to new open spaces is not likely to be seen until developments are completed, and this is not likely to occur until the mid to long-term.</p> <p>Large scale transport infrastructure considered necessary to keep pace with projected growth for example, new station stop on the London Overground at Brixton and/or Loughborough Junction and improvements to step-free access where there is an identified funding gap, are unlikely to be seen until at least the long term, towards the end of the plan period due to nature of works and/or lack of identified and committed funding.</p>	<p>Permanent once policy and projects have been delivered.</p> <p>Temporary effects will continue to be experienced by those affected by an inaccessible environment .</p>

Recommendations for monitoring likely significant effects

5C3.51 It is recommended that the following indicators are used to monitor the effects of the DRLLP PSV identified in the SA:

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

5C4 INFRASTRUCTURE

5C4.1 This section of the SA relates to the sustainability performance of the DRLLP PSV 2020 against:

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

5C4.2 To achieve this objective the Local Plan needs to ensure that appropriate infrastructure keeps pace with population growth, in particular:

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

Relevant policy objectivesNational Level

5C4.3 The *National Planning Policy Framework 2019* highlights the significance of infrastructure delivery and its relationship with strategic planning policies. In paragraph 20, it identifies that sufficient provision should be made for:

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

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

Paragraph 34 on development contributions states that plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).

Regional Level

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

Baseline conditions and existing issues*Cemeteries and Crematoria*

- 5C4.5 The council owns and manages three cemeteries, providing burial provision for its residents. Of these, West Norwood Cemetery is located within the borough and Lambeth Cemetery and Streatham Cemetery are located outside of the borough in LB Wandsworth.
- 5C4.6 A report to the GLA in 2012 (An Audit of London Burial Provision, University of York) concluded that the low use and capacity of the West Norwood Cemetery leads to the conclusion that the borough should be considered as having no significant burial provision. The other Council owned cemeteries were reliant on created graves – i.e. using spare space within the cemeteries to create graves – and therefore had very little capacity for additional burials.
- 5C4.7 The LB Lambeth Cemetery Capital Investment Priorities, Officer Delegated Decision Report (February 2015), identified that there were 1,400 burial plots available in Lambeth Cemetery but no capacity in Streatham and West Norwood Cemeteries. It detailed that with investment in West Norwood, capacity in the council's cemeteries would increase the amount of available burial plots to 2,750, which will meet the council's need for the next 15 years.

Education

- 5C4.8 LB Lambeth is the Local Education Authority (LEA) and have responsibility for state schools within the borough. Amongst its duties are to ensure that there are adequate school places available to serve its population.
- 5C4.9 There are five nursery schools, 62 primary schools and 17 secondary schools in Lambeth. There are also five special schools, two pupil referral units and five colleges across the borough. There was a 19 per cent increase in demand for Reception places in Lambeth schools between 2009 and 2014 and Lambeth responded by adding over 500 permanent Reception places as well as over 800 temporary expansion places into schools. Lambeth built, refurbished and redeveloped schools across the borough to account for the fast-growing resident population and to meet the needs of pupils and the wider community. Overall 2,300 primary places were added during that time, the equivalent of one 1-form-entry and five 2-form-entry schools. More places are still being added as these expansions proceed through the year groups in some areas. Planned additional primary places are proposed to be added in 2021 to Wyvil Primary School in Vauxhall and Sudbourne Primary School in Brixton.
- 5C4.10 Lambeth has also seen significant expansion of places in recent years for secondary provision. Four new academies and free schools were created between 2012 and 2014 adding 2,725 secondary places in Years 7-11. Since then two schools have permanently expanded and Woodmansterne opened a 5 form entry secondary department to become an all-through school. They opened to full capacity in September 2019. Durand Academy closed its secondary department in September 2018 bringing the total Year 7 places to 2,643 in 2019. In addition, 450 additional sixth form places and 165 additional Special Education Needs and Disabilities (SEND) places have been created.

Emergency Services

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

- 5C4.12 The London Ambulance Service, in Our Strategic Intent 2018/19 – 2022/23, sets out how the service will deal with growing demands in London caused by an increase in population and the related rise in calls and incidents. The document acknowledges that assessing and redeveloping the estate will be necessary to meet future needs but that such work is ongoing.
- 5C4.13 The Metropolitan Police Service Business Plan 2018-21, sets out the priorities for the Police Service. In relation to their estate, the business plan makes clear that they wish to reduce running costs and dispose some of their estate to invest in operational services and refurbishment. The Estate Strategy is currently under review.
- 5C4.14 The London Fire Brigade's Asset Management Plan (2017) sets out how the London Fire Brigade will manage its estate of 102 Fire Stations and other premises. In Lambeth, the redevelopment of Lambeth Fire Station is identified as a priority and analysis suggests that there is a desire to replace Brixton Fire Station, but further detail is not provided.
- 5C4.15 The Asset Management Plan was produced when the Fire Brigade was run by London Fire and Emergency Planning Authority but it is now run by the Greater London Authority. The Fire, Resilience & Emergency Planning Committee of the GLA states that an estate management is part of its upcoming work.
- Health*
- 5C4.16 The Lambeth Clinical Commissioning Group (CCG) is a group of 44 GP practices in the borough who work with the Council and pharmacies, dentists, hospitals and mental health providers, to commission NHS services for residents.
- 5C4.17 Mental health services in Lambeth are provided by the South London and Maudsley (SLaM) NHS Foundation Trust who operate sites throughout south London, including in the borough.
- 5C4.18 Lambeth is home to two major hospitals serving Lambeth and other parts of London. King's College Hospital NHS Foundation Trust operates King's College Hospital in Herne Hill ward. St Thomas' Hospital in Bishop's ward is operated by the Guy's and St Thomas' NHS Foundation Trust.
- 5C4.19 Lambeth Healthcare Infrastructure Analysis undertaken by the London Healthy Urban Development Unit in July 2018 for the Lambeth CCG, sets out the future need for GP space by each CLIP area and CCG Locality in Lambeth. It identifies a shortfall of 16 GP clinical rooms by 2028 across the borough, with a shortfall identified in the north of the borough and in Streatham.
- 5C4.20 Work done by Inner Circle Consulting for Lambeth CCG in June 2018 (Brixton Health Hub: GP and Community Health Demand/Supply) identifies that there is not a shortfall for GP provision in the Brixton study area but that provision may be located in the wrong location with it being noted that there are no clinical examination rooms within Coldharbour ward.
- 5C4.21 The Guy's and St Thomas' Together we care: our strategy 2018-2023, identifies it will work with partners to explore opportunities to maximise sharing property assets and dispose of underutilised estates. Guy's and St Thomas' Trust has an ambitious estate development strategy to support our strategic priorities. This includes increasing the clinical and research accommodation required for children's healthcare, cardiovascular care, bio medical engineering and translational medicine, whilst taking into account the care redesign programme, the electronic healthcare

record programme and the move to improving integrated care across the community. There is currently almost no NHS capital, and guidance from the centre suggests that the focus for capital should be on consolidation, maintenance and safety.

- 5C4.22 The council will work with King's College Hospital NHS Foundation Trust, as it progresses a Masterplan for the redevelopment of the King's College Hospital site.
- 5C4.23 A partnership of the NHS providers and CCGs across the boroughs of Bexley, Bromley, Greenwich, Lambeth, Lewisham and Southwark, including the organisations described above (collectively known as the South East London Sustainability and Transformation Partnership) produced an Estate Strategy and Plan (2016-2021). This identifies a vision to improve health and well-being across south east London by collaborating with each other to reduce cost but increase quality, with a key aim being to improve the utilisation and efficiency of the NHS estate.
- Libraries and Community Hubs*
- 5C4.24 Local authorities are required to provide library services under the 1964 Public Libraries and Museum Act. There are currently 10 library buildings in the borough, helping to meet the council's obligations.
- 5C4.25 The LB Lambeth Culture 2020 Cabinet Report (October 2015) identifies the difficult financial environment relating to the continued provision of libraries but identifies how the council will deliver a sustainable library service built around five town centre libraries and five neighbourhood libraries.
- 5C4.26 The LB Lambeth Future Options for Lambeth Archives (October 2017) approved recommendations to develop a scheme to relocate the Lambeth Archive service to 301 Kennington Lane as a standalone facility or as part of a mixed use development and feasibility work is ongoing.
- Parks and Open Spaces*
- 5C4.27 There are over 60 parks and open spaces in Lambeth, 16 of which have been awarded the Green Flag award – the national standard for high quality parks and green spaces in the country. They promote health and well-being and increase community cohesion, to the benefit of those who live, visit and work in the borough.
- 5C4.28 The Council's Parks and Open Spaces Capital Investment Plan (2014/15 – 2018/19) identifies costed projects within each park/open space and how they are to be delivered. The Plan and the projects contained within it are in the process of being reviewed.
- Sports and Leisure*
- 5C4.29 Sports and Leisure facilities are provided across the borough by both the council and private operators. These include sports pitches and courts, swimming pools and an ice rink. Most of the outdoor facilities are located within the council's parks and open spaces. Indoor provision is provided in the form of six leisure centres, which are managed by GLL on the council's behalf.
- 5C4.30 The Culture 2020 Cabinet Report (October 2015) identified the importance of providing sports and leisure facilities in the borough despite the difficult financial climate and stated a commitment to continue to invest in leisure centre facilities.
- 5C4.31 The Greater London Authority commissioned Sport England to undertake a number of needs assessments for sports and leisure facilities.
- The Strategic Assessment of Need for artificial grass provision in London

2017-2041 shows that a large portion of the demand for such pitches is met in neighbouring authorities and that the borough has one of the highest levels of unmet demand, which is likely to increase by 2041.

- The Strategic Assessment of Need for sports halls in London 2017-2041 shows that the borough has one of the highest levels of unmet demand, which is likely to increase by 2041.
- The Strategic Assessment of Need for swimming pools in London 2017-2041 shows that the borough has amongst the lowest percentage of provision per person and a high level of unmet demand, which is likely to increase by 2041.

Transport/Public Realm

- 5C4.32 In London, the Mayor/Transport for London (TfL) sets out the strategic direction for transport in the Mayor's Transport Strategy (MTS), runs the tube services (), bus services, London Overground, river services, bike hire and regulates private hire vehicles such as taxis. TfL also manages the major roads (the red routes). TfL provides transport funding to the council and the council manages all local roads in the borough.
- 5C4.33 Lambeth benefits from 14 railway stations, which has services run by Southeastern, Southern Railway, South Western Railway and Thameslink. Network Rail owns and runs Waterloo Station, the country's largest station in terms of passenger numbers. The remaining stations are operated by the relevant train operating companies.
- 5C4.34 The MTS identifies a desire to implement a healthy streets approach based on three themes:
- Healthy street and healthy people – wants to encourage sustainable transport modes and reduce car use to improve health
 - A good public transport experience – wants to continue to encourage a shift from private transport to public transport
 - New homes and jobs – seeks to plan the city around walking, cycling and public transport to ensure growth benefits
- 5C4.35 Priorities for Rail Improvement in Lambeth (2018), written by the Railway Consultancy on behalf of Lambeth Council identifies a number of rail schemes that could come forward, making an assessment of the benefits and deliverability of such schemes and whether they should gain council support.
- 5C4.36 London's strategic infrastructure requirements – an evidence base to help deliver the Mayoral strategies (2017), produced by Arup on behalf of the GLA, identifies strategic infrastructure to meet Mayoral aims, including strategic transport infrastructure. It identifies the planning status and funding status of each project.
- Utilities*
- 5C4.37 In Lambeth, a range of different companies provide utility services. Water and sewage services are provided by Thames Water, electricity is distributed by UK Power Networks and gas is distributed by SGN.
- 5C4.38 Lambeth Council is the Local Lead Flood Authority for the borough and is responsible for flood risk management in relation to surface water, groundwater and small ditches and watercourses. The Environment Agency are responsible for managing flood risk from the Thames and ensuring that the quality of water is protected and enhanced.

- 5C4.39 The Thames Water our long-term strategy 2015-2040 sets out the strategy for water resources, treatment and distribution and also sets out the strategy for wastewater collection and treatment. The Draft Revised Water Resources Management Plan 2019 identifies how Thames Water will maintain the balance between water supply and demand. It identifies that across London there would be a deficiency in water supply unless identified actions to reduce demand and develop water resource infrastructure are undertaken. Such infrastructure is identified in short, medium and long-term tranches.
- 5C4.40 The Thames river basin management plan, December 2015, produced by the Environment Agency (EA) sets out how the water quality in the Thames River Basin will be protected and enhanced. The TE2100 Plan, published by the EA in November 2012, sets out how flood risk will be managed throughout London and the Thames estuary. Lambeth lies within Action Zone 2 of the plan area and the Wandsworth to Deptford Policy Unit. Within this area the policy is to take further action to reduce flood risk beyond that required to keep pace with climate change and includes recommendations such as the need to maintain, enhance or replace defence walls and active structures to prevent flooding.
- 5C4.41 The Lambeth Local Flood Risk Management Strategy 2014-2020 sets out the following three objectives of how flood risk will be managed
- Building community resilience through empowering residents to help themselves
 - Maximising benefits through holistic water management and working in partnership with others
 - Delivering sustainable and proportionate mitigation for existing and future communities

Likely future evolution without the DRLLP PSV 2020

- 5C4.42 While there are a number of national and regional programmes and projects specific for Lambeth Borough infrastructure; it is considered that in the absence of an up-to-date Local Plan delivery of some infrastructure may be less co-ordinated and not keep pace with population and housing growth in terms of addressing identified need in the local environment in a timely manner. Impacts of poor provision are likely to deteriorate further as a result of increased development or pressure on existing infrastructure.
- 5C4.43 The delivery of essential infrastructure needed to support population growth is critical. The delivery of infrastructure needs to keep pace with development and population growth; otherwise there could be a shortfall in provision of infrastructure such as sewage, water supply, social facilities such as schools and doctors surgeries and green infrastructure such as parks and nature areas. The amount of open space per person is expected to decrease with population growth and expected new development (and a lack of opportunity for the creation of major open space). Absence of an up-to-date Local Plan increases risk that necessary and appropriate infrastructure, including improvements to existing infrastructure, specific to Lambeth will not be delivered. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of DRLLP PSV 2020 policies

5C4.44 This section examines the likely significant effects of implementing the DRLLP PSV 2020 policies on SA Objective 4, Infrastructure. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.

5C4.45 The following policies have been screened as having potential for significant effects on this objective.

D1 – Delivery and monitoring	EN3 – Decentralised energy
D2 – Presumption in favour of sustainable development	EN5 – Flood risk
D3 – Infrastructure	EN6 – Sustainable drainage systems and water management
D4 – Planning obligations	EN7 – Sustainable waste management
H1 – Maximising housing growth	Q6 – Urban design: public realm
H10 – Gypsy and Traveller needs	Q9 – Landscaping
H11 – Estate regeneration	Q14 – Development in gardens and amenity spaces
ED3 –KIBAs	Q21 – Registered parks and gardens
ED4 – Non-designated Industrial sites	Q24 – River Thames
SI1 – Safeguarding existing social infrastructure	Q26 – Tall buildings
SI2 – New or improved social infrastructure	PN1 – Waterloo and South Bank
SI3 - Schools	PN2 – Vauxhall
T1 – Sustainable travel	PN3 – Brixton
T2 – Walking	PN4 – Streatham
T3 – Cycling	PN5 – Clapham
T4 – Public transport infrastructure	PN6 – Stockwell
T5 – River transport	PN7 – West Norwood/Tulse Hill
T10 – Digital connectivity infrastructure	PN8 – Kennington/Oval
EN1 – Open space, green infrastructure and biodiversity	PN9 - Herne Hill
EN2 – Local food growing and production	PN 10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace

Delivery and monitoring policies D1 – D4

5C4.46 Policies D1 – D4 should result in significant positive effects, particularly policies D3 – Infrastructure, and D4 Planning obligations. Policy D3 seeks to safeguard and improve essential social, physical and green infrastructure to support growth, and work with partners to deliver additional infrastructure.

5C4.47 An Infrastructure Delivery Plan is provided and this gives detail on a number of projects relating to transport, education, parks and green infrastructure, community facilities and waste infrastructure requirements. Accordingly, this Plan sets out infrastructure that is planned to meet current and likely future demands. However, for some projects funding gaps have been identified which may threaten the deliverability of projects, for example transport, health and parks and green infrastructure improvement projects. The Infrastructure Delivery Plan states that the borough-level infrastructure schedule for the first five year period identifies 58 different infrastructure projects. Collectively these projects are estimated to cost £599.8 million. The Infrastructure Schedule has identified sources of committed funding where known. This results in an estimated funding gap of approximately £384.8m. The estimated amount of this gap that would need to be funded through CIL (if available and subject to project by project approval) or section 106 (where it has been/will be needed to mitigate local impacts) is £265.1m. Some projects require contingency planning. Policy D4 provides guidance on when section 106 planning obligations will be sought and this will help deliver infrastructure projects.

Housing policy H1, H10, H11

5C4.48 Housing growth will result in increased pressure and demand on the borough's infrastructure and potentially neighbouring boroughs too and it will be important that the council continues to work with infrastructure providers and partners to ensure infrastructure keeps pace with population growth and demand. The policy recognises this by optimising levels of residential density having regard to accessibility by walking and cycling, existing and planned public transport (including PTAL) and the capacity and quality of provision of surrounding infrastructure. Policy S2 also seeks to mitigate effects of housing growth on social infrastructure. Developments of 25 residential units or more will need to consider the anticipated impact on social infrastructure, and meet additional need that will arise where this cannot be met adequately through existing facilities. If this is not possible, a payment in lieu will be sought. Similarly a clause on childcare provision for development proposals for more than 500 residential units also applies. It was recommended in the SA on the DRLLP that reference to policy S2 in the housing section of the Local Plan (perhaps as supporting text) may assist applicants and better facilitate the transparency of policy expectations. Furthermore, SA recommendation 30 on the DRLLP also suggested that the policy team may consider mentioning the provision of social infrastructure in policy H11 estate regeneration, particularly for large-scale estate regeneration schemes. A cross reference to policy S2(d) in the supporting text has been added. This will help to ensure that necessary infrastructure is planned for or in place to meet likely future demands. Policy H10 seeks to safeguard the existing gypsy and traveller site in Streatham Vale. Any new site proposed will need to have a supply of essential services (mains gas, electricity, water, sewerage, drainage and waste disposal), as well as access to services and community facilities, in particular schools and health services. This is considered to positively contribute towards SA Objective 4 with regards to gypsy and travellers.

Economic development policies ED3 and ED4

5C4.49 Policy ED3 safeguards business and industrial sites in the Borough. Known as Key Industrial and Business Areas (KIBAs), only development related to business, industrial, storage and waste management, including green industries and ancillary uses will be permitted. Policy ED4 also seeks to intensify business uses (B1b, B1c, B2, B8 or *sui generis* industrial uses) on non-designated industrial sites. Sites are protected for such uses unless there is no reasonable prospect of the site being used for business purposes. This helps ensure land supply for waste management infrastructure and utilities infrastructure. Overall, the policy contributes positive effects for SA Objective 4 although deliverability of specific infrastructure may be considered uncertain.

Social infrastructure policies S1 – S3

5C4.50 Overall it is considered that policies S1 – S3 provide a good foundation for social infrastructure in the borough in relation to SA Objective 4. Policy S1 seeks to safeguard existing social infrastructure and ensure that it is maintained for community use. Policy S2 sets out the conditions where new or improved social infrastructure will be supported. No change has been made in response to SA recommendation 26 on the DRLLP (that 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 a number of SA Objectives). The policy team responded that this part of the policy (S2(c) and (d)) is specific to very large applications and requires on-site provision where existing facilities in the area cannot meet the additional need or demand. The policy team responded that it is not generally realistic and/or reasonable to expect an applicant to create new off-site provision on land they do not own. The policy response is noted and accepted. Furthermore, policy S2 clause (d) states that if it is not possible to

meet the additional need through the provision of new social infrastructure on site, a payment in lieu will be sought to contribute towards additional service provision in existing facilities. Overall, this is considered to appropriately address SA recommendation 26 and positively contribute towards SA Objective 4. However, actual deliverability of social infrastructure involves co-operation and joint-working with different organisations, as well as significant funding. The Infrastructure Delivery Plan identifies considerable funding gaps for some transport projects (eg new Overground station at Brixton/Loughborough Junction, step-free access at Brixton, Streatham, Tulse Hill stations), and increasing capacity of health centres, for example Baldry Gardens health centre in Streatham and Crown Dale in Knight's Hill ward, and increasing capacity required to make provision for adults with complex mental health needs (Mental Health care accommodation project). There is also little information known about the ability of local practices in Stockwell accommodating anticipated population growth (IDP 2019). Infrastructure necessary to support expected population growth from growth in Opportunity Areas and achievement of housing targets is essential in achieving sustainable development. Timely deliverability of necessary infrastructure remains a key concern.

Transport policies T1 – T5, T10

- 5C4.51 Transport policies seek to provide and improve physical infrastructure to enable sustainable travel, including active travel through walking and cycling routes and river transport and will likely result in significant positive effects on physical transport infrastructure. Policy T1(d) helps to ensure infrastructure keeps pace with population growth and demand by stating that development will be required to be located in an area with an appropriate level of public transport accessibility and capacity, or to contribute towards increasing public transport accessibility and capacity where this cannot be achieved through TfL or other funding as appropriate. Similarly, clause (e) states 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. Financial contributions could help achieve this. Policy T2(c) states development proposals should facilitate the improvements of footways including provision of land for adoption as highway and footway widening where increased footfall is expected. Policy T3 on cycling states that developments will be expected to enable and contribute towards improvements to cycle access, routes and links and docking locations. Further, Infrastructure Delivery Plan provides detail as to future transport infrastructure improvements and projects, as well as funding information. However, as previously mentioned, deliverability remains uncertain for some infrastructure projects in terms of funding. Policy T4 outlines the various public transport infrastructure required for better connectivity, quality and capacity of transport and travel. The policy states that development proposals should provide, or contribute to the provision of new and/or improved public transport infrastructure and services proportionate to the projected number of additional trips, and also that, where appropriate, development proposals should improve accessibility to public transport. The premise of the policy T4 is commendable; it is the deliverability of such transport schemes in a timely manner that is of key concern given the level of growth the DRLLP PSV supports.
- 5C4.52 Policy T10 recognises the importance of high quality digital connectivity infrastructure and expansion of electronic communications networks and should result in positive effects for SA objective 4, as well as the social objectives 3 (access and services), 5 (equality), 7 (liveability). Access to this type of infrastructure is increasingly considered as necessary in today's world (akin to electricity, sewage etc.), rather than a 'nice to have'. Provision and availability of affordable digital infrastructure will help address accessibility barriers, particularly among more vulnerable groups of the borough.

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

- 5C4.53 Policy EN1 seeks to protect existing open space and green infrastructure, biodiversity, improve access to open space, and increase the quantity and quality of open space and green infrastructure, including in areas of open space and/or access to nature deficiency. The policy also seeks to create or extend green chains and links thereby further contributing to the green infrastructure network in the borough. Application of the urban greening factor in major developments is expected to significantly increase green infrastructure provision in the borough, with the multitude of positive effects that it brings, such as health and well-being, air quality, biodiversity, sense of place, pride of place and visual amenity. Similarly, policy EN2 also contributes to the green network in the borough through the use of land as new allotments, orchards and for local food growing and production. This may include green roofs and the inclusion of productive trees and plants in new developments to contribute to the overall green infrastructure network in the borough and positively contribute to SA Objective 4.
- 5C4.54 The delivery of district heat networks is considered uncertain, particularly in terms of identifying sites for Energy Centres, but also in terms of access to land for pipework. It is noted the IDP identifies a significant funding gap for the combined heat and power scheme for Vauxhall and South Bank project to provide district heating.
- 5C4.55 Policy EN5 addresses flood risk and contains policy to mitigate flooding from sewers which should be discussed with Thames Water Utilities Ltd; and policy on flood defence walls to ensure these are maintained, remedied and improved where necessary.
- 5C4.56 Policy EN6 provides for sustainable drainage systems and water management. Clause (vii) requires development proposals to demonstrate that water supply and public sewerage networks have adequate capacity or can be provided, and where there is a constraint on the capacity, the council will apply phasing conditions to ensure necessary infrastructure upgrades are delivered ahead of the occupation. This is further supported in the supporting text. Similarly, where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades. Overall it is considered that the policy should result in positive effects for water and sewerage infrastructure and SA objective 4.
- 5C4.57 It is considered that Policy EN7 on sustainable waste management makes adequate provision for safeguarding existing waste management sites and new areas/sites in KIBAs and other appropriate locations to provide additional capacity to meet the borough's waste management needs, given the limited land supply in the borough.
- Quality of the Built Environment policies Q6, Q9, Q14, Q21, Q24, Q26**
- 5C4.58 Overall it is considered that the built environment policies appropriately provide for the public realm infrastructure including green infrastructure through protecting landscaping features such as planting, habitats and registered parks and gardens. Policy Q24 also positively contributes to SA Objective 4 by ensuring that the river's 'blue infrastructure' value and connection with adjoining green infrastructure is recognised.

5C4.59 Draft London Plan policy D8 (and referred to in DRLLP PSV policy Q26) seeks to ensure 'the capacity of an area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building'. It is considered that this policy, together, for example, with transport policies (section 8), social infrastructure policies (section 7), housing policies (section 5) and delivery policies (section 4) of the DRLLP PSV will work towards achievement of SA objective 4.

Places and neighbourhoods policies PN1 – PN11

5C4.60 Overall, it is considered that the places and neighbourhoods policies make appropriate policy provision for infrastructure relative to scale of development proposed, in particular those places earmarked for significant growth such as Waterloo, Vauxhall and Brixton. Most policies seek to improve public realm, linkages for pedestrians and cyclists and provide for transport accessibility and capacity improvements. The Infrastructure Delivery Plan outlines projects to achieve these improvements. However, for some projects there are significant funding gaps that raise concern for the deliverability of such improvements. Policies for Waterloo, Vauxhall and West Norwood seek to increase the green infrastructure and open space provision. Most of the policies also make provision for community services and facilities (the smaller centres like Clapham, Stockwell and West Norwood achieve this particularly well to ensure the continued vitality of these district centres).

5C4.61 The level of growth proposed for Brixton would benefit from a new station at Brixton or Loughborough Junction providing accessibility to north east London via the London Overground. The improvements to public transport infrastructure such as a fully accessible refurbished mainline train station and working with TfL to open the rear entrance to Brixton Underground Station would also seek to benefit the level of growth planned for the area in terms of public transport infrastructure in Brixton. However, as already highlighted in this appraisal, timely delivery of various types of infrastructure is a key concern across the borough.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

5C4.62 Overall, and taking into account the appraisal prompt questions and targets set out in Sustainability Framework, it is likely that DRLLP PSV 2020 will result in a mix of positive, and uncertain effects with regards to adequate infrastructure being in place in a timely manner to accommodate expected growth.

Table 11: Summary assessment of effects of DRLLP PSV 2020 on Infrastructure

Assessment of effects of DRLLP PSV 2020 on SA objective 4	Score	Justification of Score	Timescale and probability	Permanent or temporary
To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	?	<p>The DRLLP SPV makes clear that housing growth, economic development and environmental sustainability cannot be achieved without a wide array of essential infrastructure. The DRLLP PSV policies provide good context and provision for the different kinds of infrastructure required to meet current and future demands. Accordingly much required infrastructure is planned. Some infrastructure improvements such as upgrades of Northern and Victorian underground lines have recently been completed and others are currently being completed, such as new underground station at Nine Elms. However, there remain uncertainties about the <u>delivery</u> of essential infrastructure required for growth. These relate to timing – there is a real risk that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front before occupation of development (for example Vauxhall /Nine Elms where large scale development is already occupied before completion the extension of the Northern Line to Nine Elms in 2020); funding required – for some of the proposed infrastructure funding has not yet been secured (e.g. new rail station at Brixton and/or Loughborough Junction, heat networks) and; proportion of open space per resident is likely to reduce as the population increases whilst new open space opportunities are extremely limited thus potentially worsening open space deficiency area rates. Insufficiencies in burial space are likely to continue.</p> <p>The Infrastructure Delivery Plan states that the borough-level infrastructure schedule for the first five year period identifies 58 different infrastructure projects. Collectively these projects are estimated to cost £599.8 million. The Infrastructure Schedule has identified sources of committed funding where known. This results in an estimated funding gap of approximately £384.8m. The estimated amount of this gap that</p>	<p>Recently completed upgrade and improvement works of some underground lines and stations are providing some alleviation to capacity issues at some stations.</p> <p>Infrastructure required to meet demands of occupied new development will likely not be provided until at least the medium to long term, and in some cases may be delivered after occupation of major developments, in which negative impacts will likely be experienced in the interim.</p> <p>Delivery of several infrastructure projects considered necessary to support projected growth are unlikely until the long term, possibly at the earliest.</p>	Permanent once (and if) delivered, however there will be temporary effects until necessary infrastructure is delivered (effects relating to construction and lack of infrastructure in the interim).

		<p>would need to be funded through CIL (if available and subject to project by project approval) or section 106 (where it has been/will be needed to mitigate local impacts) is £265.1m.</p> <p>To summarise, although policy may seek positive effects and impacts on local communities through sufficient social infrastructure (and indeed physical and environmental infrastructure); it is deliverability of such infrastructure that can be uncertain, both in time and space.</p>		
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Recommendations for monitoring likely uncertain effects

5C4.63 It is recommended that the following indicators are used to monitor the effects of the DRLLP PSV 2020 identified in the SA:

- Infrastructure Delivery Plan updates

5C5 EQUALITY AND DIVERSITY

5C5.1 This section of the SA relates to the sustainability performance of the DRLLP PSV 2020 against:

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

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

5C5.3 Once adopted, the Local Plan is a development plan and cannot alone tackle all inequalities. However many planning policies can help to reduce inequality gaps, both directly and indirectly.

Relevant policy objectivesNational Level

5C5.4 *National Planning Policy Framework 2019*, paragraph 91 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other - for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrians and cycle connections within and between neighbourhoods, and active street frontages.

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

5C5.6 Interestingly, the words 'equality', 'inequality' and 'diversity' are not mentioned in the NPPF 2019. The word 'inclusive' is mentioned twice, as demonstrated above. There are two references to 'different groups' (in the context of housing delivery); paragraph 61 that states 'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)'; and paragraph 72: 'ensures that a variety of homes to meet the needs of different groups in the community will be provided'.

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

marriage or civil partnership.

Regional Level

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

Local Level

- 5C5.9 The *Lambeth Borough Plan 2016 – 2021* sets out three priorities: creating inclusive growth, reducing inequality, and building strong and sustainable neighbourhoods. The Plan contains a number of goals and ambitions to achieve these priorities that also help create an environment that is accessible to and fully inclusive for all people. In 2019 a report was published to include 20 new goals for the council and Lambeth First Partnership to work towards. These involve building local economies to generate prosperity and opportunity; investing in people and neighbourhoods to strengthen community resilience; working with partners to reform public services to provide care and promote independence; and maintaining the quality of the physical environment to improve wellbeing and encourage investment. The report states 'reducing inequality and environmental sustainability are two themes that run throughout the Borough Plan. These are not confined to single goals, but will be reflected across the Plan in the outcomes we are seeking and the way we measure our impact'.
- 5C5.10 *Lambeth Equality Commission Report and Recommendations 2017* sets out evidence and recommendations on four key themes: education and learning; income and employment; participation, decision-making and leadership; and crime and justice. These address some of the areas where there are significant inequalities between different groups of residents, but also because they are areas where there is the greatest potential for influencing inequality by taking action at a local level.
- 5C5.11 *Time for Change: Disability 2018* is a report prepared by the Lambeth Equality Commission on an event on 27 June 2018 aimed at taking feedback, ideas and potential solutions to reducing exclusion from disabled residents and organisations. The Lambeth Equality Commission Report 2017 found that disabled people are one of the groups most likely to experience inequality across different areas of their lives. It recommended a set of actions the council should take to help reduce inequalities affecting disabled people. The Time for Change report sets out further analysis to this.

Baseline conditions and existing issues

Age

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

leave the borough with small children. The borough has a small proportion of people aged 60+ (SOB 2016).

5C5.13 Box 4 below demonstrates that various ethnic groups in the borough have different age profiles.

Box 4: The various ethnic groups in the borough have different age profiles

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

Potential Issues affecting Older People

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

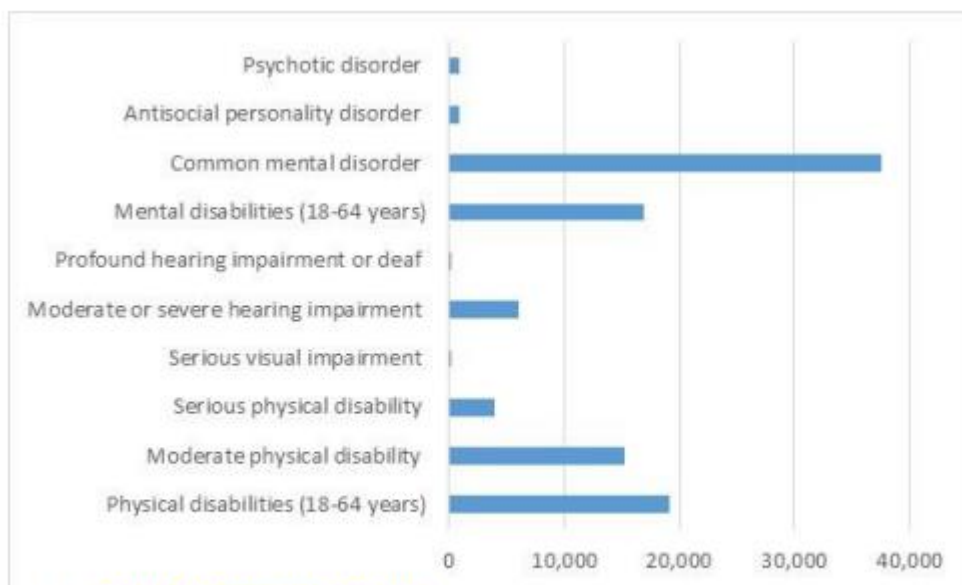
Potential issues affecting children and young people

- Those aged under 15 years make up almost one in five residents in the borough.
- Child poverty and social exclusion is often caused by parents and guardians not having access to employment and training opportunities.
- The provision of high quality social facilities, including childcare, play and informal recreation, youth services and meeting places, sport, leisure, culture and educational facilities. Space for young people is a particular priority in those parts of the borough where levels of youth unemployment, crime and gang activity are high.
- A lack of access to free and inclusive play space and open space can hinder mental and physical development and independence. As the population of the borough increases, access to quality play provision will become an increasing priority across the borough as a whole.
- Concerns relating to crime, safety and vulnerability particularly in relation to street crime and road accidents.
- Reliable, safe and inexpensive (or free) public transport is required to enable young people to be independently mobile.
- Obesity is a growing problem among children and young people in the borough.
- Lambeth has a high number of young people Not in Employment, Education or Training (NEET)

5C5.14 *Disability*

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

Figure 8: predicted numbers of disabled people (2015)



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

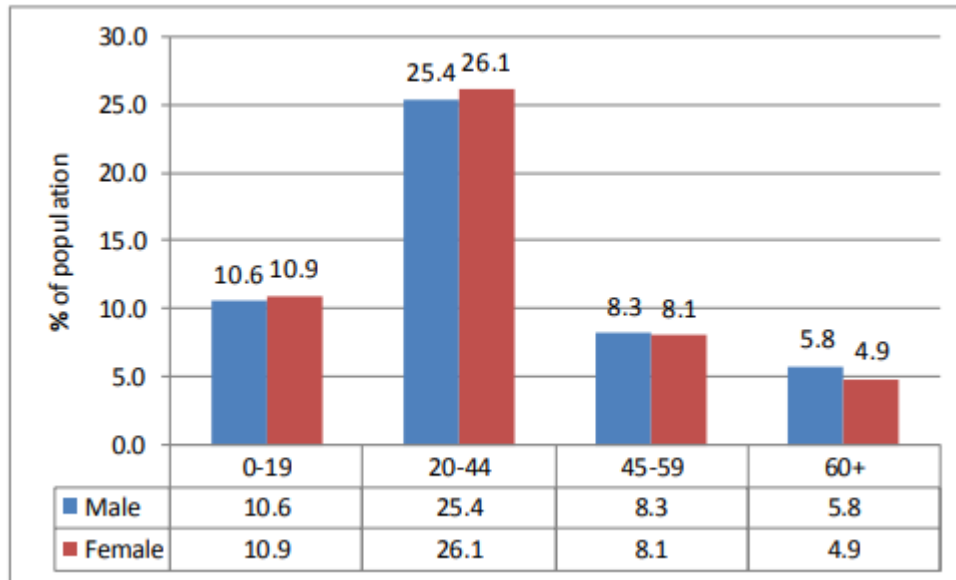
Potential issues for people with disabilities

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

Gender

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

Figure 9: Population by gender and age



(SOB 2016)

Potential issues affecting gender

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

Pregnancy and maternity

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

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

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

Sexual orientation and gender identity

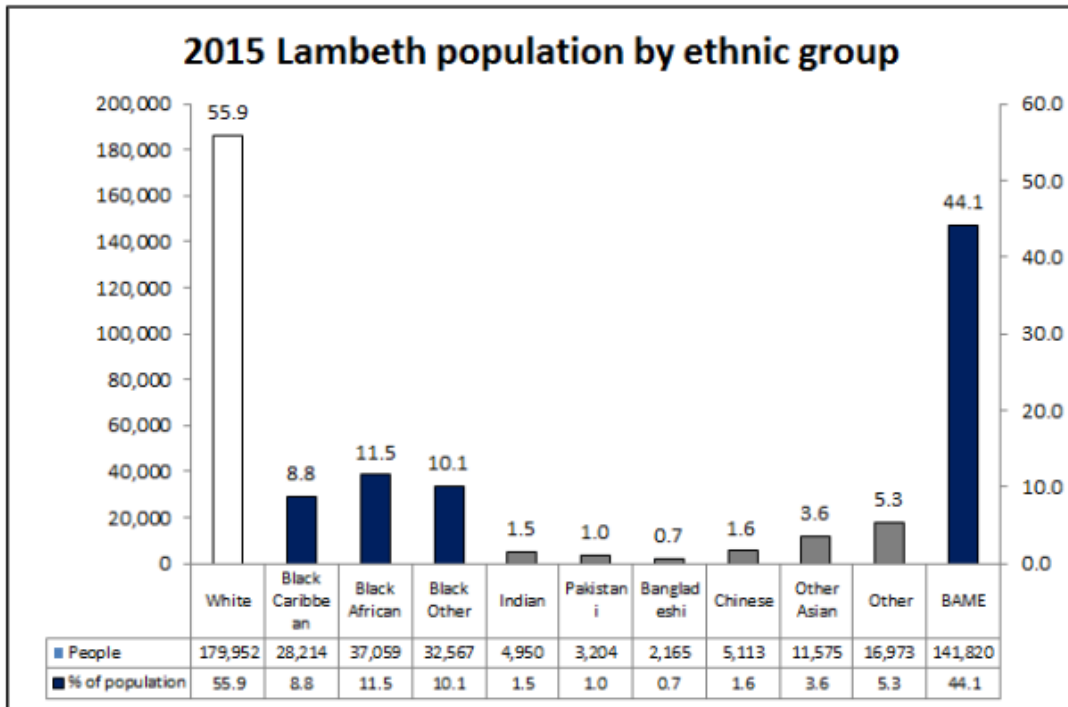
5C5.18 Regional data suggests that around 3.5% of people in London are Lesbian, Gay, Bisexual and Transgender (LGBT). Recent health estimates suggest that Lambeth has one of the largest populations of gay men in the UK. 4% of respondents to the Lambeth Residents' Survey identified themselves as lesbian,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

Potential issues affecting gay, lesbian, bisexual and transgender groups

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

Ethnicity

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



Potential issues affecting race / ethnicity

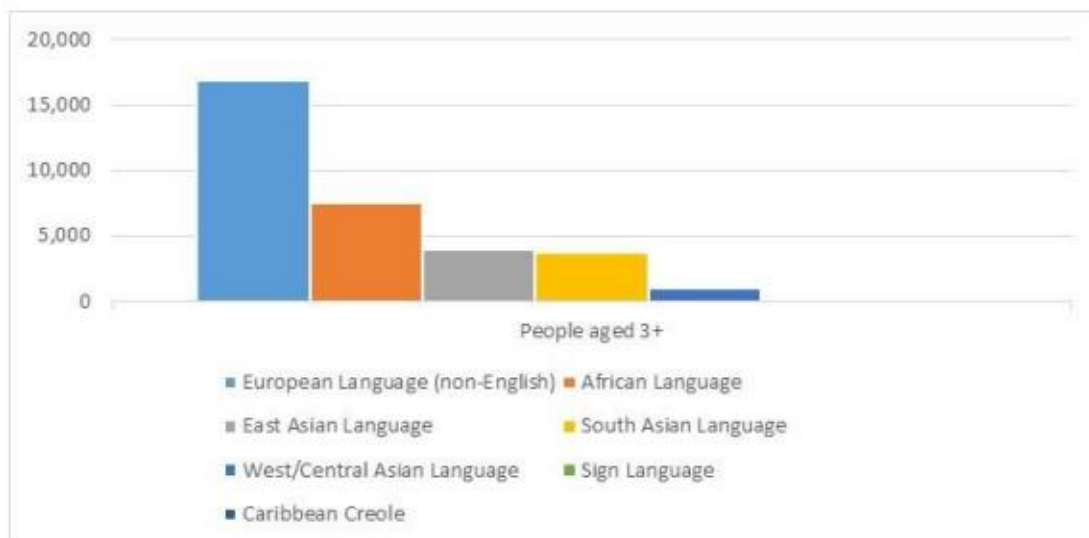
- Accessing suitable affordable housing can be problematic.
- Fear of crime, racial abuse and discrimination can prevent the enjoyment of the public realm and accessing open space.
- Employment opportunities including affordable premises for small businesses and shops.
- Recently arrived communities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

(SOB 2016)

Language

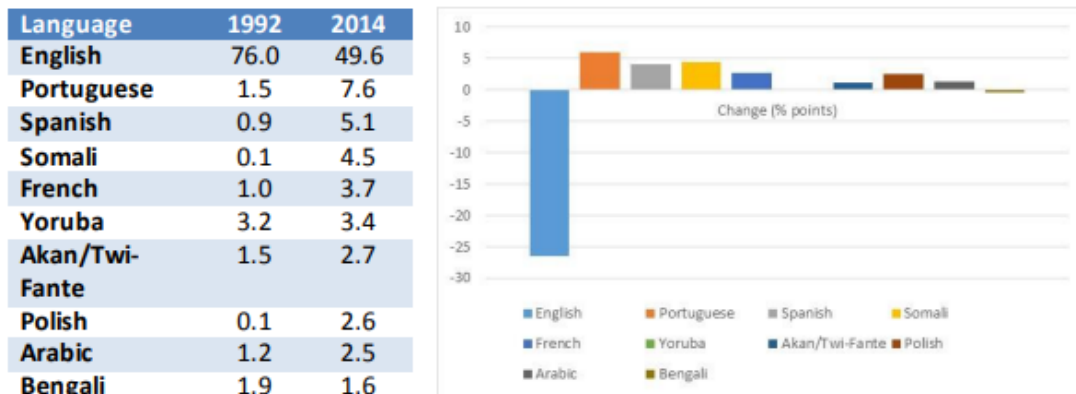
5C5.20 Around 150 different languages are spoken families in the borough. Around 17,000 people (6% of the population) speak a main language other than English, mostly EU and African languages (SOB 2016).

Figure 10: Language groups



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

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



(SOB 2016)

Religion

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

Potential issues affecting faith groups

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

Socio-economic status, affluence, poverty and deprivation

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

employment and health outcomes (SOB 2016).

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

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

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

Figure 12: Deprived areas in the borough

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

(SOB 2016)

5C5.27 13 of Lambeth's 178 LSOAs are in the 10% most deprived nationally, 7%. In 2010, 8 LSOAs were in the 10% most deprived. Almost half (85/ 178, 48%) are in the second and third deciles, and 147/ 178 (80%) are in deciles 2-5. Coldharbour is the most deprived ward by some way, with half of its LSOAs in the 10% most deprived. 10/13 of the most deprived areas are concentrated in the centre of the borough, mostly Brixton, with 3/13 in Norwood. Even the most affluent wards have a range of deprivation, all including the 2nd decile (SOB 2016).

Figure 13: Deprivation by ward

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

(SOB 2016)

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

Figure 14: Indices of deprivation

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

Health

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

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

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

Figure 15: Life expectancy at ward level

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

(SOB 2016)

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

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

Figure 16 Better Health for London outcomes

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

- 5C5.36 There are a growing number of people with learning disabilities living in the borough. The proportions of people with mental health problems and with physical disabilities and older people helped to live at home are increasing. One-third of those aged 65+ is estimated to live alone. The number of those aged over 85 is expected to increase which will significantly increase age-related long-term conditions and demand for care services. This includes some people with enduring mental health needs who will become part of the ageing population, with particular housing needs.
- 5C5.37 Lambeth has a relatively high birth rate in comparison to national averages, but has a lower rate than other inner London authorities and the rate has been reducing over the past four years after years of growth since 2001 (ONS, 2017). The infant mortality rate (death in babies under 1 year) has decreased steadily in Lambeth and is currently 4.1 deaths per 1,000 live births, which is broadly in line with the London and national averages.
- 5C5.38 The Lambeth Clinical Commissioning Group (CCG), a group of 44 GP practices in the borough, work with the Council and pharmacies, dentists, hospitals and mental health providers, to commission NHS services for residents. The Lambeth Public Health Directorate now sits within the Council. *Lambeth Healthcare Infrastructure Analysis* undertaken by the London Healthy Urban Development Unit in July 2018 for the Lambeth CCG, sets out the future need for GP space by each CLIP area and CCG Locality in Lambeth. It identifies a shortfall of 16 GP clinical rooms by 2028

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

Likely evolution without the DRLLP PSV 2020

- 5C5.39 The London Plan provides good provision of policies for ensuring equal opportunities and social cohesion; however the local context that the DRLLP PSV 2020 offers, in particular on improving job prospects for the young and/or unemployed residents, delivery and tenure of affordable housing, housing standards, access to infrastructure, delivering mixed and balanced communities and improving environmental conditions for Lambeth's deprived areas and deprived communities, including regeneration may be lost in the absence of an up-to-date Local Plan for Lambeth. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished. The DRLLP PSV 2020 has been prepared in line with the priorities and goals set out in the Borough Plan 2016 – 2021 (with updated 2019 report). Absence of a Lambeth Local Plan will mean that in so far as planning can influence; priorities set out in the Borough Plan may not be achieved.

Assessment of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

- 5C5.40 This section examines the likely significant effects of implementing the proposed DRLLP PSV 2020 policies on SA Objective 5, Equalities. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.

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

D1 – Delivery and monitoring	ED10 – A2 uses, betting shops and payday loan shops
D2 – Presumption in favour of sustainable development	ED11 – Local centres and dispersed local shops
D3 – Infrastructure	ED15 - Employment and training
D4 – Planning obligations	S11 – Safeguarding existing social infrastructure
H1 – Maximising housing growth	S12 – New or improved social infrastructure
H2 – Delivering affordable housing	S13 - Schools
H3 – Safeguarding existing housing	T1 – Sustainable travel
H4 – Housing size mix in new developments	T2 – Walking
H5 – Housing standards	T3 – Cycling
H6 – Residential conversions	T4 – Public transport infrastructure
H7 – Student housing	T5 – River transport
H8 – Housing to meet specific community needs	T7 – Parking
H9 – Hostels and houses in multiple occupation	T9 – Minicabs, taxis, private hire and ride hail services
H10 – Gypsy and Traveller needs	EN1 – Open space, green infrastructure and biodiversity
H11 – Estate regeneration	EN2 – Local food growing and production
H12 – Build to rent	EN3 – Decentralised energy
H13 – Large-scale purpose-built shared living	EN4 – Sustainable design and construction
ED1 – Offices (B1a)	EN5 – Flood risk
ED2 – Affordable workspace	Q1 – Inclusive environments
ED3 – KIBAs	Q3 – Safety, crime prevention and counter terrorism
ED4 – Non-designated industrial sites	
ED7 – Town centres	
ED8 – Evening economy and food and drink uses	

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Q4 – Public art
Q6 – Urban design: public realm
Q13 – Cycle storage
Q16 – Shop fronts
PN1 – Waterloo and South Bank
PN2 – Vauxhall
PN3 – Brixton
PN4 – Streatham

PN5 – Clapham
PN6 – Stockwell
PN7 – West Norwood/Tulse Hill
PN8 – Kennington/Oval
PN9 - Herne Hill
PN 10 – Loughborough Junction
PN11 – Upper Norwood/Crystal Palace

In addition to the policy prompt questions set out for SA Objective 5 in the Sustainability Framework, the following appraisal also uses a series of indicators in relation to inequalities and social exclusion to help assess the impact of policies. These indicators have been derived from research undertaken by the Town and Country Planning Association and Trust for London in their publication 'London Planning for a Just Society? Exploring How Local Planning Authorities Are Embedding Equality and Inclusion in Planning Policy' October 2019. The results of this assessment are set out in tables below under each thematic policy area of the Local Plan. Recommendations to help advance equality and help foster good relations are provided where appropriate.

Delivery and monitoring policies D1 – D4

5C5.42 Policies D1- D4 will contribute towards the attainment of SA Objective 5 through working with a range of partners, delivering regeneration defined in Opportunity Area Planning Frameworks and local area master-plans (and these contain areas of the most deprived parts of Lambeth such as Brixton), including helping to promote and maintain mixed, balanced and diverse communities within neighbourhoods. The council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth that result in inclusivity and equality of the Borough. Policy D1 states a number of ways the council will deliver the Local Plan, including, by helping to promote and maintain mixed, balanced and diverse communities within neighbourhoods, ensuring maximum accessibility for people with disabilities and a child-friendly environment. Policy D3 states the council will work in partnership with infrastructure service providers (for example TfL and Network Rail, Lambeth College, NHS and various council service areas for education, sport, leisure, parks and culture) to ensure delivery of additional infrastructure. Section 106 funding will provide or fund local improvements to infrastructure, including access to facilities, access to employment and affordable housing. Overall it is considered that these policies will benefit various protected groups, for example older persons, younger persons, disability and race.

Housing policies H1 – H13

5C5.43 Overall it is considered the housing policies should result in positive effects on SA Objective 5. By increasing the supply and range of housing, including affordable housing of mixed tenures and size, and including accommodation for people with care and support needs; local plan housing provision will likely work towards benefitting all protected equalities groups, as well as those on low income levels, those with mental ill health and multiple long term health conditions and particularly those requiring specialist housing through providing greater housing choice, tenures and availability. An increase in the availability and diversity of housing contributes to a reduction in overcrowding, which often occurs in less advantaged communities, particularly BME communities, and where renting dominates housing ownership, as it does in Lambeth. All housing policies contribute towards delivery of more and improved quality (warmer, safer and healthier) housing and more genuinely affordable housing in the borough, which will help all protected equalities groups as well as those on low incomes and those with mental health and long-term health conditions. Policies seek to improve conditions for the disproportionate number of people, often BAME, older people and lower income people living in Lambeth's older housing stock. It is considered that policy H2 on affordable housing seeks to secure the Mayor's threshold levels of affordable housing from new development and provides for a range of different income levels, from low cost rented housing (social rent/London affordable rent) and intermediate provision. 70% of new affordable housing should be low cost rented homes allocated to need in line with the council's allocation scheme and for Londoners on low incomes (social rent/London affordable rent). This will benefit the lowest income groups of the borough. 30% should be

intermediate products including London Living Rent and London Shared Ownership. Over time, this should result in increased availability of more genuinely affordable housing for existing Lambeth residents, and significantly positive effects for the achievement of SA objective 5.

- 5C5.44 The DRLLP PSV is clear that affordable housing should be provided on-site. It should be equivalent in siting, appearance and layout to other housing on-site (i.e. tenure blind), and demonstrate that the integration of different tenures has been considered from the outset. This should therefore result in more equitable outcomes and feelings of social cohesion for a number of protected groups as well as those of lower socioeconomic status. However, if affordable housing on-site is not feasible in terms of site configuration and layout and the policies in the development plan, supporting text states that off-site provision may be considered. Off-site provision will only be considered where an alternative site has been identified and can be delivered through planning obligation. The site would need to be in the borough and as near as practicable to the principal site; no further than one mile away. A distance of 1 mile can result in a very different neighbourhood and environment. Examples of circumstances in which off-site provision may be considered, includes where, having secured an alternative site, it would be possible to secure a more mixed and balanced community, secure a significantly higher level of provision than would otherwise be secured through on-site development, and address priority needs more effectively, especially for affordable family housing tenure and house type. The expectation is that affordable housing is provided on-site. The council must be satisfied off-site provision is as close to the principal site as possible for the most equitable outcomes for occupiers of affordable housing and the achievement of successful mixed and sustainable neighbourhoods. Requiring affordable housing contributions from minor housing developments also helps to meet high level of affordable housing need in Lambeth and achieve SA objective 5. Payments in lieu can also contribute to wider programmes of affordable housing delivery, which will likely contribute to achieving positive outcomes for various equality groups.
- 5C5.45 The council will apply Draft London Plan policy H10 B where loss of existing affordable housing is proposed. All schemes are required to follow the viability tested route. Again, this approach should result in significant positive effects for lower income groups and those that rely on social rent or London Affordable Rent housing.
- 5C5.46 Similarly, net numbers of existing housing is safeguarded. Exceptionally loss of residential accommodation may be acceptable where the proposal is for specialist non-self-contained accommodation to meet an identified local need (DRLLP PSV policy H8). This provides opportunity to benefit more vulnerable groups in Lambeth, including the following protected groups: age, disability. To ensure mixed and balanced communities, a range of dwelling types, sizes and tenure is required and the DRLLP PSV provides for this. Communal amenity and children's play areas should be accessible to all residents of the development, irrespective of tenure. Such space should be designed to be inclusive for all users, and be accessible to all residents of the development, irrespective of tenure. New housing must conform to Draft London Plan policy D5 (accessible housing) and building control standards (this includes 'wheelchair users dwellings' and 'accessible and adaptable dwellings'), and policy H5, together with EN4, will help to address accessibility (both internal and external space), overcrowding and the risk of ill-health from damp or mould thereby helping protected groups such as age, race, disability as well as lower socio-economic status. Policy H8 makes provision of housing to meet specific community needs, and therefore works to benefit the more vulnerable groups of society (for example older persons, those with significant mental or physical health limitations). Such housing needs to be suitable for the intended occupiers, relevant to client

needs including inclusive design, and accessible to public transport services and social networks. Design needs to address the needs of people with dementia and other long-term health conditions. This all helps to advance equality.

- 5C5.47 While the DRLLP PSV makes provision for student housing; the priority use of land is meeting conventional housing and employment needs and the achievement of mixed and balanced communities. The development of sites for student housing will be carefully managed and specific criteria will need to be met. However, it is not considered that the policy adversely affects student groups. Supporting text states the ability to accommodate disabled students should be fully integrated into any student housing development. There is also provision for affordable student housing, and where leisure facilities are proposed, these should be made available to the public where there is an identified shortage of provision. This should help in advancing equality and result in positive effects on various equality groups in the local area. It also states that leisure facilities within purpose-built student accommodation should be made available for public use in locations where there is an identified shortage of provision; and that this will be secured through planning obligations. This helps improve accessibility to such facilities and help foster good relations and will likely result in positive effects on the achievement of SA Objective 5.
- 5C5.48 Policy H8 supports the provision of housing to meet specific community needs, across a range of tenures. Housing to meet specific community needs in Lambeth can include temporary accommodation for homeless households, sheltered housing with care support, reablement accommodation (intensive short-term), accommodation for victims of domestic abuse and/or violence, staffed hostels, residential-care and nursing-care homes, extra-care housing, and supported housing provision for children, people with physical and learning disabilities or those with mental health issues who require additional support, older persons and other client groups. These forms of specialist housing often provide essential accommodation for the most disadvantaged and vulnerable residents. Loss of this type of housing in the borough will be resisted. Proposals for new housing to meet this need will need to demonstrate how the design will address the needs of people with dementia and other long-term health conditions.
- 5C5.49 Policy H9 makes provision for new hostels and Houses in Multiple Occupation, and policy H10 sets out a commitment to safeguard the existing site for gypsy and traveller needs and the council will manage the churn in vacant pitches on this site to meet the identified future need. It is considered that these policies contribute positively to achieving SA Objective 5 and the targets set out in Table 4 as well as advancing equality and fostering good relations particularly for the more vulnerable groups of our community.
- 5C5.50 Policy H11 estate regeneration should result in significant positive effects for lower income Lambeth residents (minimum 50% affordable housing is required and affordable housing floorspace should be replaced on an equivalent basis in an estate regeneration scheme). It was recommended that the DRLLP consider a reference to policy EN4 sustainable design and construction in policy H11, particularly as section 10 and policy EN1(a)(ii) are mentioned (SA recommendation 31). No change was made as a result of this recommendation as the policy team considered that all Local Plan policies will apply and full cross-reference is not required in each policy. The response is noted and considered appropriate given the borough-wide applicability of policy EN4 sustainable design and construction. Overall it is considered policy H11 will benefit a number of protected groups. For example increasing permeability in the existing urban fabric and improving safety and access for walking, cycling and public

transport use are likely to benefit those identifying with the following protected groups: age (older and younger persons), disability, race, religion and belief, sexual orientation, pregnancy and maternity, sex, gender reassignment, as well as those of lower socio-economic status.

- 5C5.51 Build to rent policy H12 should also result in significant positive effects for lower income groups accessing housing as well as those identifying themselves within protected groups such as age, race. The preference for a separate core/block for low cost rented housing is for equity reasons. Having a registered social provider managing the separate core allows the council to receive nominations and choose providers that will best address Lambeth need. It is considered this policy seeks to provide genuinely affordable housing for Lambeth residents and should result in positive effects on equality groups.
- 5C5.52 Policy H13 large-scale purpose-built shared living provides a housing option that may be more appealing for young and/or single persons. It might attract those new to London and wanting to meet new people and therefore better enabling them to feel part of a community. It might also attract those no longer able to live in student accommodation, but wishing to stay in central locations. Shared living will only be supported in Waterloo and Vauxhall where it meets Draft London Plan policy H18 and Lambeth-specific requirements, and it is considered that these locations are appropriate for the intended occupiers, while enabling feasibility to provide affordable housing contributions.
- 5C5.53 Overall it is considered that housing policies H1 – H13 work to advancing equality of opportunity for lower-income communities, residents with an existing health condition or disability, older people and young people. The policies together and in combination with other DRLLP PSV policies such as Q1 inclusive environments and EN4 sustainable design and construction, and transport policies, help reduce poverty and social exclusion, promote social cohesion, enable social integration between minority groups and wider society, foster good relations and promote good accessibility in particular for older and people with disabilities. It is also considered that the housing policies effectively support the Lambeth Borough Plan 2016 – 2021 three priorities: creating inclusive growth, reducing inequality, and building strong and sustainable neighbourhoods.

The following table provides a check-list of indicators in relation to inequalities and social exclusion to help assess the impact of the housing policies.

Housing development indicator	Assessment	SA recommendation	Policy response
Minimum percentage of affordable housing: Are policies outlining the percentage of affordable housing required from new housing developments strong and ambitious?	Yes – in line with Draft London Plan standards.		
Required tenure split of affordable housing: Does housing policy specify a minimum percentage of social rental tenure requirement within the wider 'affordable housing category'?	Yes – 70% of new affordable housing units should be low cost rented homes allocated to need in line with the council's allocation scheme and for Londoners on low incomes (social rent/London		

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	affordable rent) and 30% should be intermediate products including London Living Rent and London Shared Ownership.		
Retention of affordable housing: Does housing policy require the like-for-like re-provision of affordable housing to ensure no net loss of affordable housing tenures?	Yes see policy H3(b) that refers to Draft London Plan policy H10B.		
Tenure blindness: Does housing policy require 'tenure blindness' of affordable housing units?	Yes see policy H2(c)		
Wheelchair accessibility of homes: Does policy consider (wheelchair) accessibility of housing and Lifetime Homes, and require the 90% M4(2) and 10% M4(3) split required under the London Plan?	Draft London Plan policy D5 applies to all residential development.	SA recommendation 3: 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.	Accepted. The following text has been added to policy H5(a): iii) meet the requirements for accessible housing in London Plan policy D5.
Quality of housing: Do housing policies include well defined standards for design and quality	Yes – DRLLP PSV Policies H5 and all Q policies apply together Draft London Plan policy D4, D5		
Sites for Gypsies and Travellers: is there consideration of sites for Gypsy and Travellers based on assessed demand?	Yes – see DRLLP PSV policy H10		
Play space: Do policies require the delivery of play space, and do they refer to the need for accessible/inclusive play space?	Yes see DRLLP PSV policy H5(d) that states: Play areas should be accessible to all residents of the development irrespective of tenure.	SA recommendation 4: It is considered that policy H5(d) could be strengthened so that it appropriately refers to 'inclusive' as well as 'accessible' play space.	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.'
Amenity space: Are there policies to ensure that new housing developments will include communal amenity space, and do they include requirements for inclusive/accessible design?	Yes – see DRLLP PSV policy H5		
Community housing: Are there policies supporting co-operatives, community land trusts, co-housing, tenant management organisations, self-help housing, community self-build, community development trusts, and other forms of community-led housing?	Yes - vii) supporting self-build and custom-build housing where it can be demonstrated that the residential density of the site has been optimised and other policy requirements have been met, including those for affordable housing.		

- Economic Development policies ED1 - ED4, ED7, ED8, ED10, ED11, ED15***
- 5C5.54 Policies ED1 – ED4 seek to protect and maintain sites and premises in business use and provide affordable workspace, thereby maintaining and/or increasing employment opportunities in the borough to help create inclusive growth by distributing the benefits of new development to Lambeth residents. Provision for affordable workspace and flexible workspace suitable for micro, small and medium enterprises increases availability of workspace for specific social, cultural or economic purposes. This will help benefit start-ups, creative businesses and not-for-profit and/or charitable organisations supporting Lambeth’s creative and digital industries (CDI) economy and providing significant social value. There is a shortage of lower-cost B class space or workspace for small businesses across Lambeth, particularly for businesses in the creative sectors. Provision of affordable workspace is particularly important in opening up start-up opportunities to for example, lower-income communities, women, language and BAME groups. Implementation of the policy and approach to planning obligations that will secure the affordable workspace will be set out in the council’s Affordable Workspace SPD (due to go to Cabinet in February 2020). The forthcoming SPD will itself be subject to the EqlA process. The SPD will contain information on the selection criteria for approved affordable workspace providers. Such criteria will likely include their capability in activity that promotes the workspace tenant opportunities, services and events to residents local to their workspace – particularly for those in priority groups; facilitating corporate social responsibility activities between the voluntary sector and tenants within workspace; creating employment and training opportunities for residents local to their workspace; and their business conduct, for example their approach to London Living Wage; local employment (where appropriate) and inclusive recruitment. The selection of approved affordable workspace providers will also be subject to EqlA when the decision report is written.
- 5C5.55 Policy ED7 Town centres, also seeks to safeguard local shops, and other local services to meet community needs, and it is considered that this will help support different cultural retail sectors. Through this, the policy will assist those who are less mobile, such as older people, people with disabilities and those on low incomes by having these services accessible and local thereby reducing the need to travel, or at least the need to travel far. Encouraging new residential development on appropriate sites in town centres and residential use above ground level also reduces the need to travel, increases accessibility to fresh, local and cultural food, and promotes social cohesion and therefore works to benefit equality groups (e.g. age, disability, race) and lower socio-economic groups provided these are available on affordable terms. Major redevelopment proposals in town centres will also need to re-provide small shop premises on affordable terms, which will contribute to maintaining locally owned businesses and help support social, cultural and ethnic diversity of the area. The policies contribute to increased access to localised employment which will benefit many equalities groups including women and parents in terms of offering a better work and domestic life balance. Policy ED11 will have similar positive impacts on equality groups as it seeks to have day-to-day local retail uses such as newsagents, chemists, grocers and bakers within walking distance of home, thereby providing increased accessibility for low income groups, the elderly, women in pregnancy and maternity stage and people with mobility difficulties. Lambeth’s markets are well established and popular with local communities and visitors. The protection of existing indoor and street markets in the borough (policy ED12) provides continued opportunity for access to affordable, fresh and healthy food; food from a variety of cultures, supports market holders; fosters good relations; and maintains the social value of markets, and will likely result in positive outcomes for various equality groups.

- 5C5.56 Policy ED8 Hot food takeaways, includes a clause directed at school aged children attending primary or secondary schools and aims to reduce childhood obesity levels. While this particular group has been identified and singled out (and it may be argued that the policy does not promote equity or fairness between population groups (i.e. compared against other age groups)); it is considered that the wider benefits to children and society generally outweigh any perceived unfairness. Proposals for drive-through takeaways are not supported in any location, which helps in part to improve health outcomes, with potential to reduce obesity levels and improvements in air quality. The policy prevents stopping up of public highway to provide outdoor seating areas for food and drink uses, thereby benefiting a number of protected equality groups (such as elderly, people with disabilities, and parents with prams) through appropriate accessibility.
- 5C5.57 Policy ED10 aims to manage over-concentration of A2 uses, betting shops and payday loan shops. While some may consider this might have a negative impact on low income groups and perhaps the race protected group (such as reduced selection of choice and opportunity) it may also equally result in positive effects on these groups by reducing opportunities to spend money / get into debt (i.e. betting shops, payday loan shops). While it is noted that policy ED10 will likely result in positive effects for Lambeth in regards to limiting A2 uses, betting shops and payday loan shops, it is acknowledged that this may, in some cases, result in displacement of demand and impacts on neighbouring boroughs. This can be acknowledged in the Statements of Common Ground with neighbouring boroughs.
- 5C5.58 It is considered that policy ED15 should result in significant positive effects on attainment of SA Objective 5, advancing equality and fostering good relations by helping to ensure local jobs go to local people, and that these people have the necessary skills to partake in the employment opportunities offered by major development in the borough. Financial contributions will be sought from major developments to help support those sections of the Lambeth workforce that are furthest from employment, having been out of work for a long period of time and/or having low levels of skills. It will unemployment and disadvantage in the workplace, help address child poverty and provide opportunities for young people (but not limited to just the young) to get work through apprenticeships. Major developments must include a site-specific Employment and Skills Plan which includes details of how the developer intends to engage with local schools, colleges and/or community organisations to promote a range of careers, thus promoting equitable outcomes for skills and training opportunities for certain protected groups. The policy is likely to benefit young people, the unemployed (who may include BAME) and lower income communities in particular, who may have more limited access to education and employment opportunities. It may also help women and caregivers in providing localised employment which can assist in maintaining or improving a better work/life domestic balance.
- 5C5.59 Overall it is considered the economic policies advance equality of opportunity for lower-income communities, BAME and women. The creation of a healthy food environment, reducing barriers to employment and ensuring a diverse retail and market offer can also improve health and wellbeing outcomes, which can be important for those who have an existing or long-term health condition or disability.

The following table provides a check-list of indicators in relation to inequalities and social exclusion to help assess the impact of the economic development policies.

Economic development indicator	Assessment	SA recommendation	Policy response
Employment space: Do policies protect against the loss of employment space, in particular Strategic Industrial Locations and Local Significant Industrial Sites?	Yes and protection for industrial land use classes – see DRLLP PSV policy ED3 and ED4.		
Affordable workspace: Do policies require an amount/percentage of affordable workspace from commercial and mixed development?	Yes – clear targets defined. See DRLLP PSV policy ED2.		
Local employment: Are there requirements for developers to form agreements on local employment and apprenticeships?	Yes – clear targets defined. See DRLLP PSV policy ED15.		
High streets: Are there policies to protect high streets and local shops?	Yes – protecting high streets inside and outside of town centres. See DRLLP PSV policies ED7, ED11 and PN policies.		
Local markets: Are the policies to support local markets, recognising their social value?	Yes – but without recognition of social value. See DRLLP PSV policy ED12.	SA recommendation 5: Amend 1 st sentence of supporting text para 6.87 as follows: 'Markets add to the vibrancy, social value and character of local areas.'	Accepted.

Social infrastructure policies S1 and S2

5C5.60

Policy S1 safeguards existing social infrastructure and policy S2 supports new or improved social infrastructure both of which should impact positively on all equality groups. It is noted that the DRLLP PSV provides protection of all existing social infrastructure, and this will include those social infrastructure that supports groups with protected characteristics. Proposals for more than 25 residential units should include appropriate provision of social infrastructure to meet the additional need that will arise, where this cannot be met adequately through existing facilities. Policy states new social infrastructure should be made available to all residents irrespective of tenure. Similarly, proposals of 500 residential units should incorporate suitable childcare provision to meet additional need that cannot be met by existing facilities. In the SA on the DRLLP 2018 it was recommended that to maximise positive effects on all groups in the local area, the provision of all new social infrastructure should be made available to all residents of the local area, rather than just those of the new development (SA recommendation 32). No change to policy was made as a result of this recommendation as 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 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 was 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. The response is noted and is considered appropriate to address SA recommendation 32 on the DRLLP.

The following table provides a check-list of indicators in relation to inequalities and social exclusion to help assess the impact of the social infrastructure policies.

Community space indicator	Assessment	SA recommendation	Policy response
Protection of community spaces: Are there policies in place to protect and retain community spaces which support groups with protected characteristics?	Yes – general protection of community facilities – see DRLLP PSV policy S1		
New community spaces: Does the plan include a policy for the delivery of community spaces which considers the importance for social inclusion/cohesion?	DRLLP PSV policy S2 doesn't explicitly consider social inclusion/cohesion but it is considered the policy inherently provides for this. Otherwise Yes – see policies Q6, Q4 S3(d)	SA recommendation 6: 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 sited to maximise shared community use of premises, where practical.</u> ' Policy EN1 or its supporting text could also refer to social inclusion.	Accepted Policy S2(a)(iii) has been amended as follows: buildings and facilities are designed to be flexible, adaptable, <u>promote social inclusion and be sited to maximise shared community use of premises, where practical.</u> 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: ' <u>...promote play, recreation and social inclusion,...</u> '

Transport policies T1 – T6, T8

5C5.61

Transport policies T1 – T4 promote sustainable travel, including walking, cycling and use of accessible public transport. Policies seek to improve access to public transport, improve walking and cycling routes and reduce dependence on the private car which will benefit poorer residents (including those 50% of residents that do not have access to a private vehicle) those that prioritise their health, and those less able to travel. The policies support improvements to public transport services which will be focused on maximising its use especially by people with disabilities, the elderly, young children and others for whom public transport accessibility is a barrier. Other barriers to public transport use will arise if it is too expensive, inconvenient, unreliable or is felt to be unsafe so it is important the council lobbies for improvements in this regard as well. Addressing such barriers helps advance equality, eliminate discrimination and foster good relations although it is recognised that some of these barriers are outside the scope of planning policy. In so far as planning policy is able; it is considered the public transport policies seek to undertake what is possible through planning to address applicable barriers. Improvements to public transport infrastructure should have positive impacts on equality groups especially if they link deprived neighbourhoods with areas of employment opportunity. However timely deliverability of such projects can be uncertain.

According to the Infrastructure Delivery Plan, there is no progress or update for new high-level stations at Brixton and/or Loughborough Junction connecting to the London Overground, nor is there progress for access improvements and platform lengthening to Wandsworth Road and Clapham High Street Stations. There is also a significant funding gap (£16M) on refurbishments to provide step-free access and a safer and improved user experience at Brixton Rail Station so effects on equality groups and the wider population of Brixton are less likely to be maximised. Similarly there is a current funding gap on improving step-free access at Tulse Hill Station. The lack of step-free access adversely affects the following protected groups: age (older and younger), disability and pregnancy and maternity. The council will need to continue to lobby TfL, Network Rail and other appropriate bodies for the required funding/ delivery of improvements. The provision of safe and secure walking and cycling routes should have positive impacts on those who are more likely to suffer harassment in the streets, such as LGBTQ+ and BAME groups and also those with mental health issues. However, the whole journey experience needs to be accessible, from leaving the house to arriving at the desired destination. All journeys, particularly those made by public transport, involve an element of walking. People with disabilities, and powered mobility scooters and wheelchairs users all use (or should be able to use) footpaths as part of their journeys in a safe and inclusive manner. Policy T1 supporting text requires transport assessments to identify areas requiring improvements to support people with disabilities and reduced mobility. This is considered to have a positive effect on SA Objective 5 and the disability and age protected groups Clause (e) in policy T2 on walking states that the council is committed to ensuring that the physical environment in Lambeth, including all our streets, is fully accessible to all. Provision for pedestrians should therefore be inclusive and prioritise those with particular mobility needs. This policy approach is commended and should result in more positive effects for those equality groups with accessibility needs, provided such improvements are delivered. It is noted that the IDP identifies funding gaps for some transport projects, for example Healthy Route Network, Low Traffic Neighbourhoods, Loughborough Junction Public Realm which suggests it is uncertain when such projects can be delivered. Until they are, adverse impacts for some protected groups will continue.

- 5C 5.62 SA recommendation 33 on the DRLLP requested clarification on whether policy T2 applies to the shared use of road space/public realm between pedestrian and vehicles, as the shared use of space can be problematic for people with disabilities, the elderly and young children/parents. The policy team noted that while the policy does not specifically mention shared space, it also does not preclude it either. Department for Transport (DfT) guidance has been issued to halt the implementation of shared space only: "in areas with 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 and comfort of these user groups. An additional sentence has been added to supporting text paragraph 8.9 as follows: 'Where space is to be shared between pedestrians and vehicles, the safety and comfort of these user groups must be considered and prioritised'. This is considered to adequately address SA recommendation 33 and positively contribute to SA Objective 5 and relevant protected groups.

- 5C5.63 Policy T3 cycling, clause (f), has been updated to ensure that cycle parking provision in developments caters to people with disabilities, thus positively contributing to SA Objective 5 by ensuring equitable outcomes for all people who would like to use cycle parking. Furthermore, 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). The policy team has accepted this recommendation and updated the DRLLP PSV accordingly.

SA recommendation 7: policy team consider whether the words 'regardless of tenure' should be added to the end of clause (h) policy T3.

Policy response: Accepted.

- 5C5.64 Policy T4 on public transport infrastructure sets out a number of projects that seek to improve accessibility to public transport through walking and cycling and including step-free access at railway and underground stations and delivery of the Access for All scheme at Streatham Station and other priority locations. It is unclear how 'other priority locations' will be identified. This was put to the policy team and their response was that priority locations will be identified based on differential journey times with and without step-free access as well as the number of affected users. The response is noted and accepted in relation to the SA. Overall it is considered that policy T4 appropriately seeks to achieve an accessible public transport network thus providing positive impacts for people with disabilities, elderly, pedestrians with prams and other people with reduced mobility. However, as described above, there are current funding gaps for projects that seek to provide step-free access and generally improve stations, for example Brixton Rail and Tulse Hill stations, which means that until such time as step-free improvements are delivered, there will continue to be adverse impacts on particular equality groups (i.e. disability, age and pregnancy and maternity).
- 5C5.65 Parking for people with disabilities for new residential developments is set out in Draft London Plan policy T6.1. For non-residential developments, Lambeth will apply London Plan policy T6.5 on non-residential disabled persons parking. 'Adequate provision' should be made for disabled parking (at least one bay), dependant on local factors such as the nature of the development, site constraints and existing provision. Supporting text paragraph 8.35 to DRLLP PSV policy T7 states that the availability of step-free access to public transport is a relevant consideration and where appropriate the developer will be expected to facilitate improvements to this. These improvements will help to ensure that those with particular mobility needs are better able to utilise public transport. Clause (f) states that Blue Badge parking should be located closest to town centres and the entrance of facilities which also positively contributes to SA Objective 5 and the disability protected group. The provision of car clubs (aim is for a car club space within 400m of each other) should impact positively on equalities groups, particularly those with no access to a car, those that live in areas of poor public transport accessibility, people with disabilities, older residents, and those on lower incomes / cannot afford to own and run a car. For those groups that require it, the DRLLP PSV 2020 makes provision of mini-cabs, taxis, private hire and ride hail services which will help address accessibility and safe travel, particularly at night for women, LGBTQ+, pregnancy and maternity and older and younger

persons.

The following table provides a check-list of indicators in relation to inequalities and social exclusion to help assess the impact of the transport policies.

Transport indicator	Assessment	SA recommendation	Policy response
Transport infrastructure: Does the plan include policies on the provision of inclusive and accessible transport options?	Yes – see DRLLP PSV policies T1 – T4. It is considered there could be some tweaks to policy to further strengthen the ambition.	SA recommendation 8: Policy T1 (e) 1 st sentence could be amended as follows: 'Development should contribute towards the improvement of <u>inclusive access to public transport...</u> ' 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...'	Accepted.
Pedestrians and cycling: Are policies in place to improve walking and cycling in the area which consider the needs of groups with protected characteristics?	Yes – see policies T2 and T3. It is considered that the needs of particular groups with protected characteristics are considered in the policy, although the groups are not explicitly mentioned. For example, making walking safer (policy T2(a)) and ensuring the physical environment, including all streets, is fully accessible to all (policy T2(e)) will benefit the people in the following protected groups: age, disability, gender reassignment, pregnancy and maternity, race, religion and belief and sexual orientation. And therefore it is considered their needs have been inherently considered in the formulation of this policy, as well as T3 cycling.		

Environment policies EN1 - EN5

5C5.66 Policy EN1 seeks to protect existing open spaces and green infrastructure, and increase the quantity of open space and green infrastructure through proposals including within new development, and contributing to the creation of green corridors. Major development in areas of open space deficiency and/or access to nature deficiency will need to provide new on-site open space/access to nature improvements (or make financial contributions), although it is uncertain whether the policy will directly benefit equality groups living in areas of open space deficiency (outside of the new development). Protection of existing open space and green infrastructure and increasing quantity of open space and green infrastructure in the borough helps encourage healthy lifestyles and mental well-being for those equality groups at greater risk of ill-health (e.g. some children and young people, some older people, some women, some members of ethnic minority communities, people with a history of mental illness). The Lambeth Green Infrastructure Strategy 2018 states

that evidence suggests certain population groups are more likely to benefit, for example:

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

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

5C5.67 Policy EN2 enables access to cheaper or even free fruit and vegetables which will benefit lower socio-economic groups, reduce poverty and improve health and social inclusion/sense of community. The incorporation of community gardens, allotments, orchards and innovative spaces for food growing are encouraged in major developments (not limited to residential) and therefore can benefit, for example, faith groups, people with disabilities, young and older persons groups that use buildings or land in D1 or D2 use class.

5C5.68 Fuel poverty can be addressed through policies EN3 and EN4, together with applicable Draft London Plan policies, which will help reduce energy bills and benefit lower socio-economic groups, the elderly and other groups struggling to provide a warmer home. In terms of flood risk; the location of housing in relation to health hazards is an important consideration for those who are less able to deal with the impacts of flooding, for example older people, people with disabilities, people with particular mental health needs, and children and young people. A key issue will be assessing the potential vulnerability of occupiers in flood risk areas, including arrangements for safe access and egress. The council will apply Draft London Plan policies for improving air quality and managing heat risk, both of which acknowledge the adverse effects that can be experienced by the more vulnerable members of society, such as the very young, the elderly or those with pre-existing health conditions. Overall it is considered that policies EN1 – EN5 will have positive effects on advancing equality and achieving SA Objective 5 provided the long term use and benefits are considered from implementation.

The following table provides a check-list of indicators in relation to inequalities and social exclusion to help assess the impact of the open space policies.

Open spaces indicator	Assessment	SA recommendation	Policy response
Protecting existing green and open space: Are there policies safeguarding, and improving the accessibility of, existing green and open spaces from development?	Yes – see DRLLP PSV policies EN1 (a) and (d)		
Green and open space: Are there policies to provide open and green space, and do they prioritise areas of open space deficiency?	Yes – see DRLLP PSV policy EN1 (c)		

Quality of built environment policies Q1, Q3, Q4, Q6, Q16

5C5.69

Policy Q1 inclusive environments is considered a key policy for all development under the DRLLP PSV to achieve SA objective 5, advance equality, foster good relations and is therefore likely to result in significant positive impacts for people with disabilities, older people, other people with mobility constraints, children, LGBTQ+, pregnancy and maternity, faith groups and BAME. It should be noted the Draft London Plan also places a significant emphasis on inclusive environments. In the SA on the DRLLP it was recommended that to ensure clarity around the applicability of inclusive environments, the text should specify that the policy applies to all new development as well as the wider public realm. No change was made as a result of this recommendation as it was considered that the opening text in supporting text paragraph 10.1 sufficiently addresses the matter by stating that ‘All new development should be accessible to all...’. Furthermore, the policy team have noted that the matter will be further addressed in the council’s proposed Urban Design Code SPD. The response is noted and considered appropriate to address SA recommendation 34 and positively impact SA Objective 5. It is also further noted that Draft London Plan policy D7 states development proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive and well connected...

5C5.70

Policy Q6 – urban design and public realm also seeks to provide a public realm that is improved for all users, particularly through legibility, permeability and convenient access for all users and offers positive benefits for protected equality groups. In the SA on the DRLLP it was recommended, as per the appraisal of policy Q6 for SA Objective 3 (Access and Services), that in regards to SA Objective 5, the DRLLP should consider the surface materials used in the public realm and their ease of use for different equality groups (SA recommendation 35). As per the consideration of SA recommendation 28, it was noted that there is a council agreed standard for streetscape materials and street furniture and perhaps further guidance/detail should be provided on this standard. The policy team did not consider it appropriate to reference the use of specific surface materials in the policy as the Highway’s Department is undertaking separate work on a materials schedule which will consider this matter. The response is noted, and while a materials schedule is not currently available to be read in conjunction with the policy, it is considered that the supporting text to policy Q6 adequately references that ‘public realm works are consistent with the council’s agreed standard streetscape materials and street furniture’. This is considered appropriate to ensure that the public realm offers positive benefits for all equality groups and therefore positively contributes to SA Objective 5 and 3. SA recommendation 36 on the DRLLP further suggested that the policy team be 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 people with disabilities, elderly and young children/parents/carers (SA recommendation 36). The policy team noted that 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. This is therefore considered adequate to address SA recommendation 36 on the DRLLP.

- 5C6.71 Policy Q6 has also been improved since the DRLLP with regards to wheelchair users and those with mobility issues as supporting text now states that greater clear footway distances (more than 2m) may be required in high footfall locations such as at major transport interchanges. This would benefit disability groups as well as pregnancy and maternity.
- 5C6.72 DRLLP PSV policies Q6, Q7 and Q11 have been significantly improved since the DRLLP 2018 with regards to climate change mitigation and adaptation. It is considered these policies help protect certain equality protected groups, for example age, disability and those with certain health conditions as overheated buildings and environments resulting from climate change can be potentially lethal.
- 5C5.73 Development and alterations to the built environment to create safe and secure environments that reduce crime, fear of crime and anti-social behaviour will benefit all groups but particularly women, the elderly, LBGTQ+ and BAME groups (policy Q3), positively affecting achievement of SA Objective 5.
- 5C5.74 Policy Q4 has potential to foster good relations and result in improved social cohesion/inclusion and reduce feelings of discrimination as it seeks to support, celebrate and reflect Lambeth's diverse communities.
- 5C5.75 Policy Q16 shop fronts states that designs should have level entrances where possible, thereby recognising and benefitting disability, age and pregnancy and maternity protected groups.

Heritage indicator	Assessment	SA recommendation	Policy response
Protecting heritage: Are policies in place to involve communities in heritage designation and protection?	Yes – see DRLLP PSV policies Q18 and Q23.		

Places and neighbourhoods policies PN1 – PN11

- 5C5.76 Waterloo lies to the north of Lambeth's most deprived areas. Policy PN1 should result in positive effects on all equalities groups in the area. The policy aims to promote equitable outcomes and social cohesion through affordable housing, affordable workspace, local jobs and training, improving public transport capacity and accessibility, provision of social infrastructure including health, education, childcare, leisure, and promotion of mixed use developments.
- 5C5.77 Policy PN2 for Vauxhall seeks to create a town centre – Vauxhall Cross - through mixed use developments including creation of new jobs, including construction jobs and new homes, opportunities for affordable retail, and improved transport experience throughout the area. The supporting text to the policy recognises Vauxhall's various LBGTQ+ venues and their very significant contribution to the character of the area. It is noted that this policy will work in conjunction with other development plan policies, for example inclusive design, crime and safety to ensure safe environments for this particular protected equality group. The SA on the DRLLP suggested that consideration be given to the merits of specifically safeguarding the

LGBTQ+ community and active Portuguese community given Vauxhall is a development 'hotspot' (opportunity /regeneration area) and therefore these communities could be at risk of being lost (SA recommendation 37). No change was made as a result of this recommendation as the policy team considered that the supporting text is clear about the importance of venues and facilities that contribute to Vauxhall's character. Furthermore, 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. The response is noted and considered appropriate to address the SA recommendation on the DRLLP, noting that borough-wide policies will also apply to ensure the distinctive character of Vauxhall is maintained.

- 5C5.78 Brixton contains the highest levels of deprivation in the borough and suffers from high levels of crime and fear of crime. It is also a place of significance to London's African and Caribbean communities. It is considered that Policy PN3 for Brixton should result in positive effects on all equality groups, but particularly for race and faith groups as the distinctive multicultural and diverse town centre is to be safeguarded and promoted through careful and sensitive regeneration. The indoor markets are supported; as is the Creative Enterprise Zone which seeks to maximise the amount of market, flexible, low-cost and affordable workspace suitable for creative and digital industries. Mixed use developments, protection of employment opportunities, community uses, maximising affordable and flexible workspace and improvements to public realm and public transport are also supported. Brixton is an area known for its significant levels of deprivation and the policy, together with other DRLLP PSV 2020 policies, seeks to address this in so far as planning policy can influence environmental factors on deprivation levels. Overall it is considered that the policy seeks to advance equality and foster good relations in so far as a planning policy can achieve.
- 5C5.79 Policy PN4 for Streatham should result in positive effects on equality groups, particularly those in the local area. Accessibility and use of public transport, walking and cycling will be supported through public realm and transport improvements with particular regard to safety and accessibility. As previously noted, deliverability is key to securing benefits for equality groups. The policy also supports additional housing to provide a mix of tenures and range of new residential accommodation for new and local residents which suggests this includes C2 and C4 use classes, as well as C3. This gives opportunity to residents to stay in the local area even if their living arrangements/needs change. The policy also seeks to improve Streatham's sense of place and visitor experience through (among other things) the creation of new, safe and accessible public realm and increasing green infrastructure.
- 5C5.80 Clapham has issues of deprivation and also has some of the most expensive housing in the borough. The supporting text to the policy recognises the area as accommodating a number of LGBTQ+ venues. The policy for Clapham has a strong cultural, creative and community focus which will help contribute to more equitable outcomes, and achieve better social cohesion, sense of place and identity for local residents which will likely result in positive effects on equality groups.
- 5C5.81 Similarly policy PN6 on Stockwell seeks to create a distinguishable community focus and heart and a clear physical sense of place supported by its heritage assets. Improvements to and connections between housing estates are proposed which will benefit equality groups, particularly lower socio-economic groups in Stockwell. The delivery of additional housing within the district centre and nearby neighbourhoods along with commercial, civic and other employment uses, particularly small business space suitable for creative and digital industries will also likely result in positive

impacts on SA Objective 5 and a number of protected groups. The supporting text recognises the diverse population of Stockwell, including a large community from Portugal and the Horn of Africa.

- 5C5.82 Policy PN8 also seeks to support growth in employment and housing while enhancing the quality of its existing well-defined character and sense of place and seeking maximum community benefit from development proposals. Policy PN7 for West Norwood seeks to increase the quality and variety of retail floorspace and increase workspace, commercial uses, education uses, community facilities, cultural uses and housing. Housing densities will be optimised, particularly on highly accessible sites and where public benefits can be achieved through regeneration. The centre also seeks to provide traffic and transport improvements, employment, and community and development and investment in five focal areas through mixed-use development and cultural and creative focus. This policy has a strong community focus and should result in improved social cohesion and sense of place. Improvements to the public realm to improve safety, accessibility and connectivity will help achieve equitable and safer outcomes for all protected groups. Policy PN9 on Herne Hill supports the area as a small community-focused district centre. A sense of place through its historic character is encouraged and there are public realm quality, safety and accessibility improvements proposed. The growth of creative and digital industries in the creative enterprise zone is supported, which may benefit particular equality groups in the local area.
- 5C5.83 Policy PN10 for Loughborough Junction seeks to radically improve the physical environment of this deprived community. The policy supports improvements to the local centre's retail and leisure offer so residents can access essential services within walking or cycling distance of their homes, and that there will be an adequate supply of community facilities in the area to meet need for local users, including children and young people. The council will also work with local groups to improve public transport infrastructure including step-free access at a potential new station stop on the London Overground. Should this be delivered (and it is noted no progress has been made according to the IDP); this will help achieve more equitable outcomes for all users, particularly those with disabilities, older and younger, pregnancy and maternity and result in positive effects on SA Objective 5.
- 5C5.84 Policy PN11 for Upper Norwood seeks to improve public transport accessibility in the south of the borough by supporting the extension of the Tramlink to Crystal Palace, and improvements to bus services to central London. Currently, delivery of the Tramlink extension remains unlikely as it is not within TfL's current business plan ; however the DRLLP PSV states support for it and should it be delivered would significantly benefit various protected equality groups. It was noted on the DRLLP that PN11 supports the Tramlink extension, but policy T4 on public transport infrastructure had removed reference to the Tramlink. It was therefore suggested that this anomaly be revisited (SA recommendation 38). The policy team noted that PN11 is correct in supporting the aspiration for the Tramlink extension to Upper Norwood/Crystal Palace and it has since been reinserted in policy T4 of DRLLP PSV.
- 5C5.85 An observation made for all policies (PN1 – PN11) is the reference to improving the environment for pedestrians. Interpretation of this would need to include all users of footpaths, including those in powered wheelchairs or scooters, and not just limited to those literally travelling by foot. The Plan makes mention of this in the supporting text of policy T2.
- 5C5.86 Overall it is considered that all eleven places and neighbourhoods policies (Waterloo, Vauxhall, Brixton, Streatham, Clapham, Stockwell, West Norwood, Kennington/Oval,

Herne Hill, Loughborough Junction and Upper Norwood/Crystal Palace) should result in positive impacts for their local communities and equalities groups. The policies were developed through the identification of priorities important to local people. The places and neighbourhoods policies highlight opportunities for sustainable growth in each centre and where such local growth needs to be supported by transport and other infrastructure. The purpose of each policy is to take a neighbourhood based approach and plan positively to create places that foster local community identity and inclusion. Many policies identify specific public transport and public realm improvement projects and that will have positive impacts on a number of protected equality groups. Similarly policies set out detail to support growth in employment, affordable workspace, housing (including affordable housing) cultural uses, for example.

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- 5C5.87 Overall, and taking into account the appraisal prompt questions and targets set out in Sustainability Framework, and the indicators adapted from the TCPA October 2019 publication; it is likely that the DRLLP PSV 2020 policies will have a significant positive effects on equality groups to the extent that planning policy can facilitate and achieve.

Table 12: Summary assessment of effects of DRLLP PSV 2020 on Equality and Diversity

Assessment of effects of DRLLP PSV 2020 on SA objective 5	Score	Justification of Score	Timescale and probability	Permanent or temporary
To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion	++ / ?	<p>Generally, it is considered that in so far as planning policy can influence, the DRLLP PSV 2020 contains good provisions for advancing equality, fostering good relations, ensuring equitable outcomes for all protected groups and achieving mixed and balanced communities. However, there is some uncertainty in the timely delivery of some necessary infrastructure to support development. The IDP illustrates funding gaps for some projects. For example delivery of improvements at Brixton Rail and Tulse Hill station to provide step-free access is uncertain because there are funding gaps. There are also funding gaps for some projects seeking to improve conditions for walking and cycling. Until such improvements are delivered, adverse impacts on particular groups will remain (for example disability (including mental health), age, pregnancy and maternity, LGBTQ+, race).</p> <p>The DRLLP PSV 2020 seeks to improve environmental conditions for Lambeth's deprived communities and areas, for example Brixton, Stockwell, Loughborough Junction. Policies seek to reduce poverty borough-wide through</p>	<p>It is likely that positive effects on protected equality groups, particularly on improved housing (combating fuel poverty) and affordable housing as well as wider housing choices (specific to individual needs (i.e. vulnerable people) and demands (more family sized housing combating overcrowded conditions)) will be evident as new developments are delivered (short to long term). Estate regeneration is more likely achieved over the longer term, which potentially short-term negative effects arising from decanting and relocation (but this process will be subject to its own EqIA process).</p> <p>Supporting</p>	<p>Permanent</p> <p>Possible temporary disruption to those involved in estate regeneration, and for those with disabilities, with improvements to public realm/public transport accessibility and effects of construction works of development impacting their accessibility / day-to-day activities.</p> <p>Temporary but extending probably into the long-term, effects for</p>

		<p>a number of measures such as a range of affordable housing products, including genuinely affordable housing for Lambeth residents, energy efficient homes and buildings, improved access to local employment and skills and training schemes, provision of affordable workspace, and improved access to transport and daily amenities.</p> <p>This SA identified some recommendations for the DRLLP PSV to improve outcomes for equality groups. These included:</p> <ul style="list-style-type: none"> • further tweaks to policies T1 and T4 on inclusivity and accessibility; • new social infrastructure (policy S2) is designed to promote social inclusion; • children’s play areas should be inclusive as well as accessible to all residents (policy H5); • explicit reference to Draft London Plan accessible housing policy D5 in policy H5; and • markets are recognised for their social value. <p>All recommendations were accepted and have been incorporated into the DRLLP PSV.</p> <p>Overall it is considered that in so far as planning policy can influence, DRLLP PSV policies seek to achieve SA objective 5, advance equality and foster good relations between different sectors of community and through all elements of the environment. Policy provision to achieve SA objective 5 is strong; it is the deliverability of some policies (particularly related to public transport infrastructure improvements) that is uncertain.</p>	<p>infrastructure (schools, health, transport, community facilities, and open space) will be required to support new housing development and ideally this needs to be delivered ahead of developments being occupied. However there is some uncertainty given the economic climate whether developers and infrastructure providers will be able to deliver this in such a timely manner.</p> <p>Delivery of transport projects to improve accessibility and safety for some protected groups will not be achieved until the long term due to funding gaps.</p>	<p>those affected by lack of step-free access to public transport.</p>
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Recommendations for monitoring likely significant positive and uncertain effects

5C5.88 It is recommended that the following indicators are used to monitor the effects of the DRLLP PSV identified in the SA:

- Gross affordable housing - % of habitable rooms in major developments (completions and approvals)
- Tenure of new affordable housing (completions and approvals)
- Net additional student bedspaces completed
- Number of specialist older persons housing units completed
- Gypsy and traveller pitches
- Net additional affordable workspace floorspace (completions and approvals)
- Number of disabled parking spaces per completed major development
- Infrastructure Delivery Plan updates
- Resident surveys on perception of crime and level of safety in town centres
- Resident surveys on perception of crime and level of safety in public open spaces.

5C 6. HOUSING

5C6.1 This section of the SA relates to the sustainability performance of the DRLLP PSV 2020 policies against:

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

5C6.2 To achieve objective 6 plan policies should increase access to good housing; promote increased supply of housing; increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure); meet affordable housing targets; meet sustainable housing standards; increase the mix and type of housing, including family units; reduce actual noise level and disturbances from noise; tackle homelessness and overcrowding; provide housing that ensures a good standard of living and promotes a healthy lifestyle; and provide Lambeth residents with more opportunities for better quality homes.

Relevant Policy ObjectivesNational Level

5C6.3 Paragraphs 59 to 76 of the *National Planning Policy Framework 2019* contain housing policies that are applicable to Lambeth borough. They provide policy on significantly boosting the supply of housing; strategic policies should be informed by a local housing need assessment; planning policies should identify a supply of specific deliverable sites for years one to five of the plan period and specific, developable sites or broad locations for growth, for years 6-10; and where possible, for years 11-15 of the plan, including additional buffers. Paragraphs 122 and 123 address achieving appropriate densities, taking account of identified need for different types of housing and optimising use of land to meet as much of the identified need for housing as possible.

Regional Level

5C6.4 The Draft *London Plan* contains a raft of housing policies including increasing housing supply, delivering affordable housing, including fast track approach, affordable housing tenure, housing size mix, ensuring best use of stock, build to rent, supported and specialised accommodation, specialist older persons housing, gypsy and traveller accommodation, purpose-built student accommodation and large scale purpose-built shared living, housing quality and standards, accessible housing, optimising housing density and small sites.

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

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

Local Level

5C6.7 The *Lambeth Housing Strategy 2017* sets out the priorities for housing in Lambeth for the next three years. The Strategy focuses on four priority areas: More Homes –

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

5C6.8 The *Lambeth Borough Plan 2016 – 2021* sets out three 10 year outcomes for housing: maintain socially mixed communities in Lambeth by building homes of all tenures; prevent homelessness, placing people in suitable, affordable, permanent homes as quickly as possible; and increase the quality of Lambeth's housing. In 2019 a report was published to include 20 new goals for the council and Lambeth First Partnership to work towards. These involve building local economies to generate prosperity and opportunity; investing in people and neighbourhoods to strengthen community resilience; working with partners to reform public services to provide care and promote independence; and maintaining the quality of the physical environment to improve wellbeing and encourage investment.

Baseline conditions and existing issues

5C6.9 According to Census data, Lambeth's housing stock is typical of inner London, with a large proportion of flats - 73 per cent in total. Around two-thirds of the flats are purpose built and one-third are conversions. A correspondingly small proportion, 27 per cent of the stock are houses (SHMA 2017). Around 67 per cent of households live in rented accommodation (both social and private rented) and 32.5 per cent own their own home, similar to other inner London boroughs. Seventeen per cent of households rented from the council in 2016, down from 29 per cent in 2001. The proportion of private renters increased from 18 per cent to 33 per cent during this period (SHMA 2017).

5C6.11 The average house price in Lambeth in July 2017 was £533,312, which is slightly higher than the average for London but more than double the national average (SHMA 2017). The average monthly private rent for a two-bedroom property in Lambeth in January 2017 was £1,447, slightly higher than the average rent in London (SHMA 2017).

5C6.12 Average rents in Lambeth equate to 56% of average household income, highlighting that the private rented sector is unaffordable to many residents. Accordingly, the need for affordable housing in Lambeth is high and there are over 23,000 households on the waiting list for affordable housing (Lambeth Housing Strategy, 2017).

5C6.13 There are sixteen pitches for gypsies and travellers at the Lonesome Way site in Streatham Vale. Future need for gypsy and traveller accommodation was assessed during 2014 and updated in 2016.

5C6.14 Accordingly to Census data there are around 136,000 households in Lambeth. Family households – couples with or without children - make up 29% of Lambeth's households. Lone parents make up 15% of households. Single person households make up 34% and others, such as working age house-sharers, account for 21% of households. Tenure in Lambeth is similar to Inner London – around 65% of households live in rented accommodation, and 33% (43,000 households) own their own home. Just under one in five households (25,000) rent from the council, and around 16% (20,000) rent privately. Over 70% of households in Lambeth live in flats, either purpose built or converted houses. Just over 10% of households live in detached or semi-detached houses (SOB 2016).

- 5C6.15 The lack of supply of the homes that Londoners need has played a significant role in London's housing crisis. The 2017 London Strategic Housing Market Assessment has identified a significant overall need for housing, and for affordable housing in particular. London needs 66,000 new homes each year, for at least twenty years and evidence suggests that 43,000 of them should be genuinely affordable if the needs of Londoners are to be met. This supports the Mayor's strategic target of 50 per cent of all new homes being genuinely affordable, which is based on viability evidence. 270,000 homes are in the planning pipeline, but delivery is not keeping pace (draft London Plan). Further, Lambeth children growing up and forming new households and existing households breaking up into smaller units cause housing need to increase. A mix of housing types and tenures will be required to meet the range of local housing needs (SHMA 2017). However, Lambeth's record on delivery against London Plan housing targets has been strong over the past ten years, and Lambeth is expected to exceed both its five and ten year housing supply targets (Annual Position Statement 2019).
- 5C6.16 Affordable housing need over the plan period comprises backlog need plus newly arising need. The calculations show that, based on households spending 40% of their gross household income on rent, the need for affordable housing over the 20 year plan period is 1,047 net additional homes per year. If households spend 30% of their gross household income on rent, 1,573 affordable homes would be needed per year (SHMA 2017). Over the last five years a total of 21% of all residential units approved have been affordable (Annual Position Statement: Housing Supply and Delivery 2019).
- 5C6.17 Analysis indicates that, because of the cost of shared ownership products, intermediate affordable housing products could meet a very small proportion (5%) of total affordable housing need. The analysis shows that the London Living Rent intermediate housing product, introduced recently by the Mayor of London, has the potential to meet the needs of a higher proportion of households in Lambeth: 25% of affordable housing need based on households spending up to 30% of household income on rent, or 35% of housing need if up to 40% of income is spent on rent (SHMA 2017).
- 5C6.18 The private rented sector (PRS) makes up one third of all households in the borough; at the Census 2011 there were 38,133 households in PRS housing. Between 2001 and 2011 the proportion of households in the PRS increased from 20% to 29%. GLA data estimates that Lambeth's PRS stock had reached 31% of the total housing stock by December 2014 (GLA datastore 2014). Judging by the previous rate of growth of the sector, and the fact the market conditions have not changed significantly, it can be estimated that the PRS is likely to have reached 33% of housing stock by 2017, the same percentage as the owner-occupied sector (both owned outright and owned with a mortgage). This translates into an estimated 46,500 homes.
- 5C6.19 Geographically, PRS and owner-occupied housing is more concentrated in the western (around Clapham) and southern wards, and social rented housing is more concentrated in northern and central wards. The proportion of PRS households varies from 44.7% in St Leonard's ward in the south of the borough, to 20.4% in Prince's ward in the north of the borough.
- Likely evolution without the DRLLP PSV 2020**
- 5C6.20 It is considered that the housing information in the Local Plan 2015 is out-of-date with regards to housing target, affordable housing products and viability thresholds,

dwelling size mix for affordable housing (to reflect latest evidence of housing need in Lambeth – overall household sizes are going down), affordable housing contributions from student housing proposals and proposals of fewer than 10 residential units, estate regeneration, housing on small sites, build to rent schemes and shared living. The draft London Plan sets a housing delivery target of 13,350 new dwellings to 2028/29, and in the absence of a new Local Plan the target may not be achieved, delivery would likely be ad hoc and may not necessarily deliver the type (including affordable social rent/intermediate provision) and size of housing needed for the borough, in the right locations.

- 5C6.21 There is an increasing demand for housing and especially affordable and sustainable housing within the borough. Absence of the DRLLP PSV 2020 would not likely deliver the amount and type of affordable housing needed in the right locations in the borough. Different types and sizes of housing are needed and intervention would be required in order to deliver this. The challenges to meet housing demand (including size, type, tenure) are likely to be exacerbated in the absence of the DRLLP PSV 2020. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of Policies

- 5C6.22 This section examines the likely significant effects of implementing the proposed DRLLP PSV 2020 policies on SA Objective 6, Housing. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft Plan on the objective. This review takes account of mitigation already included within the draft Plan.

- 5C6.23 The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	T1 – Sustainable travel
D2 – Presumption in favour of sustainable development	T4 – Public transport infrastructure
D3 – Infrastructure	T7 - Parking
D4 – Planning obligations	EN4 – Sustainable design and construction
H1 – Maximising housing delivery	Q1 – Inclusive environments
H2 – Delivering affordable housing	Q2 – Amenity
H3 – Safeguarding existing housing	Q9 – Landscaping
H4 – Housing size mix in new developments	Q11 – Building alternations and extensions
H5 – Housing standards	Q12 – Refuse/recycling storage
H6 – Residential conversions	Q13 – Cycle storage
H7 – Student housing	Q14 – Development in gardens and amenity spaces
H8 – Housing to meet specific community needs	Q20 – Statutory listed buildings
H9 – Hostels and houses in multiple occupation	Q22 – Conservation Areas
H10 – Gypsy and Traveller needs	Q27 – Basement development
H11 – Estate regeneration	PN1 – Waterloo and South Bank
H12 – Build to rent	PN2 – Vauxhall
H13 – Large-scale purpose-built shared living	PN3 – Brixton
ED1 – Offices (B1a)	PN4 – Streatham
ED3 – KIBAs	PN5 – Clapham
ED4 – Non-designated industrial land	PN6 – Stockwell
ED5 – Work-live development	PN7 – West Norwood/Tulse Hill
ED7 – Town centres	PN8 – Kennington/Oval
ED8 – Evening economy and food and drink uses	PN9 - Herne Hill
SI2 – New or improved social infrastructure	PN 10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace

Delivery and monitoring policies D1 – D4

5C6.24 Overall, policies D1 – D4 should result in positive effects on SA Objective 6, in particular provision for use of previously developed land and vacant buildings, and planning obligations that secure affordable housing.

Housing policies H1 – H13

5C6.25 Policy H1 seeks to maximise the supply of additional housing in the borough to meet and exceed Draft London Plan targets. This will include estate renewal and regeneration schemes, optimising potential for housing delivery on all suitable and available brownfield sites as well as maximising affordable housing delivery. Accordingly, it is considered that the policy should result in significant positive effects for SA Objective 6, in particular increasing access to good housing, and promoting increased supply of housing; however the success of the policy is dependent on the delivery of completions, which can be uncertain, depending on the economic climate and can vary year-on-year. However, Lambeth has a good record of delivery against its housing target over the last ten years. Total housing delivery has outperformed the London Plan targets by a total of 2,543 units since 2009/10. In 2018/19, 2,288 net additional dwellings were completed which is 953 dwellings above the annual target (Housing Annual Position Statement 2019).

5C6.26 It is considered that Policy H2 Delivering affordable housing should result in significant positive effects in terms of achieving SA Objective 6. In particular, significant positive effects should result for lower income groups as the policy seeks to offer genuinely affordable housing to Lambeth residents (70 per cent of affordable housing provision to be low cost rented homes and 30 per cent intermediate products, including London Living Rent or London Shared Ownership). Supporting text sets out the council's commitment in ensuring genuine affordability. It states Lambeth's Tenancy Strategy will be a material consideration in determining planning applications involving affordable housing. It is considered this provides a good range of housing products for a wide range of income groups and increased opportunity for residents to secure an affordable decent home.

5C6.27 Policy H2 follows the threshold approach of draft London Plan policy H6. Supporting text paragraph 4.5.2 of policy H5 in the Draft London Plan states: 'This means that schemes meeting or exceeding the threshold without public subsidy, and consistent with the requirements in part C of Policy H6 Threshold approach to applications, are not required to submit viability information. It provides the opportunity to move away from protracted viability debates, create certainty in terms of affordable housing requirements, embed the requirements into land values, and offer a clear incentive for developers to increase affordable housing delivered through the planning system above the level in planning permissions granted in recent years.' Paragraph 4.5.2A goes on to state that 'Schemes that do not meet this threshold, or require public subsidy to do so, will be required to submit detailed viability information which will be scrutinised and treated transparently'. It is considered that delivery of housing can be uncertain (although it is recognised Lambeth has a good track record) however it is considered that the threshold approach aims to incentivise developers to increase delivery of affordable housing by avoiding submission of viability assessments.

5C6.28 Affordable housing should comply with the borough's preferred dwelling size mix (policy H4) and meet the full range of housing needs, particularly low income households, which should result in positive effects on the achievement of SA Objective 6, particularly in regards to the provision of a range of homes including family-sized units.

- 5C6.29 The policy seeks to reinstate the requirement for payment in lieu of affordable housing on sites providing between 1 and 9 units, subject to viability. This will result in significant positive effects on the achievement of SA Objective 6 as every application for residential units in the borough will be contributing in some way towards affordable housing in the borough. This will also have significant positive effects on the achievement of SA Objective 5.
- 5C6.29 Overall it is considered that policy H2 has potential to result in significantly more people in Lambeth having the opportunity for an affordable home, thus positively contributing towards SA Objective 6. Through the policy, affordable housing targets should be met. However, despite Lambeth's current good track record, deliverability of housing completions, and indeed affordable housing completions, may not always continue to perform at the same standard particularly given the uncertainty of the UK's departure from the EU and slow economic growth generally for the UK of recent years. The positive achievement of SA Objective 6 through policy H2 will need to be monitored through planning applications.
- 5C6.30 Policy H3 safeguarding existing housing states that the net loss of self-contained residential units may only be acceptable where the proposal is for specialist non-self-contained accommodation (use class C2) to meet an identified need (in accordance with policy H8). The DRLLP PSV 2020 has been amended to remove support where the loss arises from the amalgamation of smaller separate flats to create a family-sized unit. While there is some concern that the removal of this policy may result in less family sized accommodation, the justification notes that units in general, particularly on small sites, are required in the borough to meet the housing target and ensure accommodation is available, and not just for families. By providing these units, this will likely result in positive effects on SA Objective 6 by ensuring there is opportunity for affordable decent homes. It is therefore considered that policy H3 should result in significant positive effects in attaining SA Objective 6, particularly by increasing access to good general needs housing and specialist housing. This policy also supports proposals that bring back into use long term empty or derelict homes. This helps promote increased supply of housing and will also maximise use of existing infrastructure and minimise resource consumption. The policy also limits homes used for short-term holiday rental accommodation to a total of 90 days per year. Application for change of use of permanent residential accommodation to short-term holiday lets will not be permitted. This helps maintain and protect residential amenity as well as maintain the supply of housing, and thus will likely result in positive effects on the achievement of SA Objective 6.
- 5C6.31 Policy H4 seeks to increase the mix and type of housing, including family housing, and overall should result in significant positive effects in attaining SA Objective 6. The expected mix of one-bed, two-bed and 3+-bed units for the low cost rented element of affordable housing provision is set out in the policy and is designed to meet the housing need for Lambeth. It is noted that there have been amendments to dwelling size mix for low cost social rented homes to allow up to 30% 3-bed+ units (rather than up to 35%). This change is to reflect the trend towards lower household sizes and slightly greater emphasis on 2-bed units. Intermediate products and general market housing should provide a balanced mix of unit sizes (including family-sized accommodation) and developments are expected to reflect the preferred dwelling mix set out in clause (a) of the policy. However, rigid application of this may not always be appropriate and the policy offers developers a more flexible approach to respond to current needs and demands. While this is considered reasonable and is supported, 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 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'. This recommendation has been accepted by the policy team and the following text has been reinstated to para 5.43: In all cases, proposals will be expected to demonstrate that the provision of family-sized units has been considered'. This amendment is considered to satisfy the SA recommendation, while taking account of current housing need in the borough. Overall it is considered that policy H4 should result in positive effects on the achievement of SA Objective 6.

SA recommendation 9: 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 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'.

Policy response: This recommendation has been accepted by the policy team and the following text has been reinstated to para 5.43: In all cases, proposals will be expected to demonstrate that the provision of family-sized units has been considered'.

5C6.32 Policy H5 is on housing standards and applies to new residential development including new-build dwellings, conversions and change of use schemes where new dwellings are created. It sets out minimum internal and external space standards. For internal space standards, the local plan defaults to London Plan standards. For external space, Lambeth applies its own borough-wide standards (and this is commended). In terms of maximising the range of housing available (taking into account different requirements and preferences of size, location, type), it is considered that there is very real risk that developers will opt to deliver housing set at the minimum internal space standards. The DRLLP 2018 provided no policy incentive or requirement to build homes larger than the minimum internal requirements (save for any market demand), including affordable housing. The SA on the DRLLP also noted that the 'range' of housing size would be dictated only by the number of bedrooms/bedspaces. As a result 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'. 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. The policy team have accepted this amendment and updated the DRLLP PSV accordingly. While this amendment is not within policy, it does provide encouragement and prompts applicants to consider the end user, thus seeking to maximise genuine housing choice and range for Lambeth residents. The amendment to policy H5 supporting text with regards to internal space standards helps contribute significant positive effects with regards to SA Objective 6 as well as other objectives such as 5 (equalities), 7 (liveability), 2 (health and well-being).

SA recommendation 10: 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.

Policy response: Accepted.

5C6.33 It is considered that policy H5 (c) on communal amenity areas could be improved to increase and encourage the actual use of such spaces, however the addition of text to ensure communal amenity space is accessible to all residents of the development, irrespective of tenure, and 'be designed to be inclusive for all users' is commended,

as is the addition to supporting text that ‘the quality of amenity space should meet the requirements of Local Plan policy Q2’. As outlined in the appraisal of policy H5 against SA Objective 2 (good health and reduced health inequalities), the policy team have accepted the SA recommendation and inserted the following text to the DRLLP PSV: vii) be designed to support an appropriate balance of informal social activity and play opportunities for various age groups and;...’

- 5C6.34 It is further recommended that policy H5 includes clear cross reference to housing guidance and standards set out in the Draft London Plan. This SA recommendation has been accepted by the policy team and 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.’ It is considered that all of these accepted recommendations will result in significant positive effects on SA objective 6 (housing) as well as 2 (health), 3 (access and services), 5 (equalities) and 7 (liveability).

SA recommendation 11: that policy H5 includes clear cross reference to housing guidance and standards set out in the Draft London Plan.

Policy response: Accepted.

- 5C6.34 Location dependent, the provision of the children’s play space may impact adversely on some residents in terms of noise levels and the ability to positively achieve SA Objective 6 in regards to quiet enjoyment of their home. This will need to be carefully managed as children’s play space should also be located in areas of good and safe accessibility and surveillance.
- 5C6.35 It is considered that policy H6 on house conversions effectively seeks to retain family sized homes. Rather than identifying streets not suitable for residential conversion (Local Plan 2015 approach), the policy protects dwellings suitable for occupation by families of less than 130m² from conversion into flats. Dwellings (as originally constructed) of at least 130m² may be converted into self-contained units subject to meeting other standards. The threshold for residential conversions has been reduced from 150m² to 130m² since the DRLLP 2018. This amendment may result in loss of larger single family dwelling houses but this is mitigated by the policy seeking, where possible, the reprovision of at least one family sized unit in each conversion. Bearing in mind the overall trend to smaller household sizes, on balance this approach is considered justified to achieve both more housing and appropriate mix of units for the borough. Overall it is considered the amendment will achieve SA Objective 6 and it is noted that the Design Code SPD will provide further guidance on residential conversions. The SA on the DRLLP recognised that while policy H6 acknowledges unacceptable levels of noise and disturbance to occupiers and adjoining properties, referring also to policy Q2 amenity, the policy would also benefit from recognising that dwellings were not originally built with the intention to later convert into multiple units. As a result SA recommendation 40 has been incorporated in the DRLLP PSV 2020. Additional text has been added to supporting text to state that ‘Proposals should demonstrate mitigation of potential noise disturbance to lower floor occupants arising from conversion’. This acknowledges the adverse noise and vibration effects occupiers of lower units can often experience from occupiers of upper units, and will seek to mitigate such effects through noise insulation measures. This addition will result in positive effects on SA Objective 6, better enabling ‘quiet enjoyment’ of homes for those in dwellings that have been converted into self-contained units.
- 5C6.36 Policy H7 seeks to ensure that students have the opportunity for an affordable,

decent home. Rental levels of the accommodation will need to be supported by the Higher Education Provider to which the housing is linked to and that potential for a nominations agreement has been explored for the lifetime of the scheme). Draft London Plan policy offers the fast track route of at least 35 per cent of the accommodation secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses. The policy seeks to protect areas from overconcentration of student and similar housing that may be detrimental to residential amenity, thereby ensuring mixed and balanced communities and protection of local amenity.

- 5C6.37 Policy H8 will likely contribute in significant positive effects in achieving SA Objective 6 as it provides housing to meet specific community needs including those most disadvantaged and vulnerable, such as temporary accommodation for homeless households, sheltered housing with care support, accommodation for victims of domestic abuse and/or violence, people with mental health or learning difficulties, residential care and nursing care homes, and extra care housing. Additional text has been added to clarify that housing to meet specific community needs does not include visitor accommodation. The policy also seeks to provide housing capable of adaptations to enable residents to live independently and safely in their own homes. Where there is a loss of this housing proposed, the existing floorspace should be re-provided on-site or elsewhere within the borough. Housing to meet specific community needs, across a range of tenures is imperative to achieving SA Objective 6 in ensuring everyone has the opportunity for an affordable decent home, and it is considered that policy H8 positively contributes to the achievement of this objective.
- 5C6.38 Policy H9 is also likely to result in significant positive effects on SA Objective 6 as it makes provision for those people who cannot afford self-contained accommodation and therefore seeks to address homelessness, provided such housing proposals are delivered. The policy recognises that hostels and HMOs can result in adverse impacts of local streets, so additional off-street car parking in existing or planned controlled parking zones will not be permitted. The policy also recognises that an overconcentration of hostels and HMOs in an area can harm the mix, balance and well-being of communities so new hostels and HMOs will only be permitted where this would not lead to an overconcentration (need to be at least 150m away from similar premises, when measured by walking distance at street level). This seeks to protect existing amenity for local residents. Policy H10 for gypsy and traveller needs recognises that three additional pitches will be needed in Lambeth over the plan period, but that this need can be met by managing the churn in vacant pitches on the existing site. The policy adequately manages local amenity, therefore positively contributing to SA Objective 6.
- 5C6.39 It is considered that policy H11 on estate regeneration should result in significant positive effects in the long term for both occupiers of the estate and residents of the surrounding area. Short term adverse effects (environmental and social) may be experienced through decanting of existing estate residents and construction effects for local people in the surrounding area. However, it is considered the long-term gain should outweigh the short-term effects and this would be further explored in the environmental impact assessment. In general estate regeneration has potential to provide improved housing quality (more energy efficient, modern design, warmer and healthier) for Lambeth residents, as well as in some cases an increase in the number of homes available on an affordable basis. Estate regeneration schemes must achieve at least 50% affordable housing, based on habitable rooms, with applicants required to demonstrate that the maximum viable amount of affordable housing is included. Tenure of the affordable housing should include an appropriate mix of low cost rented and intermediate affordable units to meet identified need and achieve

mixed and balanced communities. The SA on the DRLLP recommended that for transparency and fairness to developers and registered social providers, 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) (SA recommendation 41). The response to this recommendation made clear that 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. The response is noted and considered appropriate to satisfy the SA recommendation on the DRLLP.

- 5C6.40 Policy H12 build to rent seeks to maximise genuinely affordable housing provision for Lambeth residents and should result in significant positive effects for lower income groups. SA recommendation 42 on the DRLLP has been incorporated into the DRLLP PSV. Paragraph 5.113 has been updated to add 'and maintained as such' to the end of the sentence, as per the SA recommendation. This ensures the low cost block is maintained, and therefore remains equivalent in appearance for the lifetime of the building as the other block(s). This is considered sufficient to address the recommendation and thus positively achieve SA Objective 6 as well as other SA objectives (for example health and well-being, equalities and liveability objectives).
- 5C6.41 Policy H13 shared living provides a housing option that may be more appealing for young and/or single persons. It might attract those new to London and wanting to meet new people, therefore better enabling them to feel part of a community. It might also attract those no longer able to live in student accommodation, but wishing to stay in central locations. Shared living will only be supported in Waterloo and Vauxhall, and it is considered that these locations are appropriate for the intended occupiers, while enabling feasibility to provide affordable housing contributions.

Economic development policies ED1, ED3, ED4, ED5, ED7 and ED8

- 5C6.42 Policy ED1 seeks to retain and increase office floorspace in the borough. Outside the CAZ partial replacement of existing B1a floorspace in a mixed use redevelopment may be supported where other significant planning benefits (such as new housing with a threshold level of affordable housing) are delivered. This reinforces the council's priority in delivering affordable housing, and is commended with regards to SA Objective 6. SA recommendation 43 on the DRLLP was noted by the policy team and has been incorporated in the rewrite of policy approach to loss of office floorspace in the DRLLP PSV. Reference to 'high proportion of affordable housing' has been removed and the supporting text has been altered as follows: '...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 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)'. This is considered acceptable to address SA recommendation 43 on the DRLLP and provides positive effects on SA Objective 6. SA recommendation 44 was also accepted by the policy team.
- 5C6.43 Some KIBAs have been identified as having potential for both intensification and co-location with residential and other uses (e.g. TfL land on the Montsford KIBA and Knolly's Yard KIBA). The SA on the DRLLP noted that there are no specific design considerations over and above those set out in Draft London Plan policy E7 E that should be taken into account specific to these identified sites. For example, would separate access for KIBA use and residential use be appropriate, or would particular

residential configurations in relation to KIBA be warranted? It was unclear whether the residential elements in these KIBAs need to meet the housing standards set out in policy H5 and therefore SA recommendation 45 on the DRLLP suggested that part of the policy be revisited and considered as to whether any additional guidance is necessary to protect residential amenity. No change was made as a result of this recommendation as it was noted that supporting text paragraph 6.35 states that in relation to sections (b) and (c) of the policy, Draft London Plan policy D12 relating to the Agent of Change principle will also apply. This policy requires new development to mitigate impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. In turn Draft London Plan policy E7(E) states that redevelopment proposals affecting Locally Significant Industrial Sites (i.e. KIBAs in Lambeth) 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. The response is noted and considered appropriate to address SA recommendation 45 and ensure positive effects on SA Objective 6 from policy ED3.

- 5C6.44 Policy ED5 provides for work-live developments offering flexible use of buildings and space to allow both work and living within them. The policy seeks to minimise impacts on residential accommodation, thus contributing to the achievement of SA Objective 6. It also contributes to the range of homes and the range of business premises in the borough and can offer a number of benefits including a reduction in traffic, more efficient use of land, minimising business start-up costs, and supporting flexible working.
- 5C6.45 Town centres policy (ED7) makes provision for new residential development on appropriate sites, and above ground floor units. This offers more housing choice, particularly for those that enjoy the lively activity that being in a town centre brings, and/or those who prefer/need to be close to town centre amenities and transport. Policy ED8 states evening and food and drink uses will not be permitted where these cause unacceptable harm to community safety or the amenity of neighbouring residential areas.
- Social Infrastructure policy S2**
- 5C6.46 Policy S2 seeks to ensure adequate social infrastructure provision is available for residents. Development proposals for more than 25 residential units should be supported by an assessment of anticipated impact on social infrastructure, and should include appropriate provision to meet the additional need that will arise from the new residential development. Similarly, development proposals for more than 500 residential units should incorporate suitable childcare provision to meet additional need arising from the developments that cannot be met from existing provision. These provisions help ensure a good standard of living and access to social infrastructure and childcare. The SA on the DRLLP recommended that such social infrastructure be made available to residents of the wider local area (SA recommendation 32) No change was made in response to the recommendation – see paragraph 5C5.60 above. Clause (b) allows use of residential floorspace for a nursery or childcare use subject to there being a specific local need, there is no readily available non-residential accommodation in the locality, and it would not result in the loss of a complete residential unit and remaining residential floorspace would meet standards required for a self-contained dwelling. SA recommendation 47 on the DRLLP has been incorporated in the DRLLP PSV. The supporting text in policy S2 has been amended to include the following text: ‘Proposals for nurseries and childcare facilities should include access to an outdoor play area.’ This addition ensures clarity around the provision of access to private outdoor space for nurseries and childcare and will result in positive effects mainly against SA Objectives 2, 3, 4,

5, and 7.

Transport policy T1, T4, T7

5C6.47 Policies T1 and T4 seek to provide transport infrastructure to accommodate housing growth and should result in positive effects on SA Objective 6. A reduction in car ownership and private car trips is promoted in policy T7 Parking. The maximum residential car parking standards set out in Draft London Plan policy T6.1 will apply, except for areas with a PTAL 1 and 2 where Lambeth will apply fewer spaces per unit than the London Plan. Essentially for Lambeth this means the CAZ, Waterloo and Vauxhall Opportunity Areas, Brixton and Streatham town centres and all areas of PTAL 4-6 will be car-free developments. PTAL 2 and 3 areas are permitted to have up to 0.25 spaces per units and PTAL 1 areas may have up to 0.5 spaces per unit. These limits to car-parking should help improve (or at least not make worse) residential amenity and help contribute to healthier lifestyles through improved air quality and promotion of walking and cycling (although it is recognised that car-free development may be challenging for those who require a vehicle for their employment).

Sustainable design and construction policy EN4

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

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

5C6.49 Policy Q1 ensures that all new development, (and this includes dwellings) are accessible to all, including people with disabilities, older people, other people with mobility constraints and children. Policy Q2 applies to all development and protects the amenity of existing and future occupiers, neighbours and the visual amenity for the community as a whole. It is considered this policy will provide significant positive effects with regards to SA Objective 6. Landscaping improves residential amenity and enjoyment of homes and neighbourhoods and therefore policy Q9 will likely result in positive effects on SA Objective 6. Similarly, policy Q11 should ensure extensions and building alterations are subordinate to the design and character of the host building, locally distinct forms and heritage assets, including front gardens and rear gardens. To protect amenity value of rear gardens/amenity spaces, as a general rule, no rear extension should reduce the private amenity space to less than 30m² for dwelling houses or 10m² for flats, and this is commended in terms of maximising benefits with regards to SA Objective 6. Incorporating climate change mitigation and adaptation measures in the urban design of new developments (policy Q7) and alterations and extensions (policy Q11) will help provide homes that are comfortably enjoyed by occupiers all year round. Maladaptation should be considered in the design of dwellings. Policy Q12 on refuse and recycling storage and Policy Q13 on cycle storage also seek to protect residential amenity, as does policy Q14 which does not support development in front gardens or prominent corner or side gardens; and there are specific requirements for proposals in rear gardens in order to protect amenity and habitat values of these spaces. The policy has been amended to allow for some development on larger gardens subject to safeguards on amenity. It is considered these policies will result in significant positive effects on the achievement of SA objective 6. In response to SA recommendation 49 on the DRLLP, clarification has been included in policy Q14 of the DRLLP PSV to make clear that where the garden development affects a property containing flats, the minimum retained

communal garden must equate to 10m² per flat; and where the development affects a property containing non-self-contained units the retained communal garden should be no less than 50m² per ten residents. This is considered to appropriately address the SA recommendation on the DRLLP and helps achieve positive effects on SA Objective 6.

5C6.50 The vast majority of listed buildings in Lambeth are residential terraces, semi-detached houses and villas. Policy Q20 seeks to conserve and sustain the special interest and settings of these listed buildings, allowing people to enjoy their home and the local amenity in which they chose to reside. Policy Q22 on conservation areas also seeks to preserve and enhance the character or appearance of conservation areas, and will therefore result in positive effects on SA Objective 6, particularly for residents who have chosen to live within conservation areas because of the character and amenity that the environment offers. However, some people may consider the policies prohibit or impose limitations on any expansion of their home and therefore for some people the policies may not necessarily lead to full enjoyment of their home. Basement developments are supported where there are no unacceptable impacts on cumulative effects in locality (among other things). Policy Q2 on amenity is referenced in the supporting text and applicants will be required to demonstrate reasonable consideration has been given to potential impact of construction on the amenity of neighbours. Tall buildings policy Q26 supports tall buildings in locations identified as appropriate for tall buildings. Both within these locations and outside of these locations the policy seeks to manage the design of tall buildings in order to mitigate adverse effects on amenity. Overall, it is considered that policies Q20, Q22, Q26 and Q27 seek to appropriately protect local amenity of residential areas and positively contribute to SA Objective 6.

Places and neighbourhoods policies PN1 – PN11

- 5C6.51 All places and neighbourhoods will need to comply with housing policies of the Development Plan. In Waterloo and South Bank, it is noted that there may be tensions between the cultural / tourism / entertainment uses of the area and residential amenity, although it is considered this can be appropriately managed, for example, through suitable design, agent of change principle and partnership working.
- 5C6.52 Housing can be an appropriate use within town centres, subject to relevant town centre policies. Some places and neighbourhoods policies specifically include provision of additional housing and some support the inclusion of housing as part of a mixed use development. Housing is supported in all PN policies. Opportunities for new housing development will be supported on suitable sites.
- 5C6.53 Coupled with all housing policies, it is considered that the places and neighbourhoods policies should result in positive effects for SA Objective 6 and many of the appraisal prompt questions, particularly in improving access to good housing.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 Policies

5C6.54 Overall, and taking into account the appraisal prompt questions and targets set out in the Sustainability Framework, it is likely that the DRLLP PSV 2020 will have significant positive effects - albeit with some element of uncertainty on improving the existing baseline conditions - on ensuring everyone has access to decent, appropriate and affordable housing.

Table 13: Summary assessment of effects of DRLLP PSV 2020 for housing

Assessment of effects of the DRLLP PSV 2020 on SA objective 6	Score	Justification of Score	Timescale and probability	Permanent or temporary
Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++/?	<p>On the whole, it is considered that the DRLLP PSV will generally have significant positive effects on SA Objective 6. This is because the DRLLP PSV makes provision for new housing that will be of appropriate housing mix, type, tenure and size enabling social inclusion and the ability to remain in a community for a life time if so desired. Affordable housing policies have been strengthened (compared to Local Plan 2015) to better ensure delivery and availability of genuinely affordable homes for Lambeth residents (policy H2 and H12) in line with Draft London Plan policy. All housing will be well designed both individually and with other buildings and the surrounding environment and all residential developments will need to provide for affordable housing. Residential amenity will be protected.</p> <p>In line with housing growth set out for Lambeth in the Draft London Plan, and Draft London Plan policy H2 that states boroughs should proactively support well-designed new homes on small sites; the DRLLP PSV 2020 provides a package of policies to achieve sustainable housing growth. Policy H3 with the removal of policy support for flat de-conversions or change of use from housing to nursery; policy H6 reduction in the threshold for residential conversions from 150m² to 130m²; preparation of the Design Code SPD and Q14 developments in gardens all work together to enable delivery of housing that meets the needs of Lambeth residents and households.</p> <p>This SA has made recommendations which have been accepted and incorporated into the DRLLP PSV. These included:</p> <ul style="list-style-type: none"> • Consideration of family-sized units being reinstated to policy H4 	<p>It is considered that the DRLLP PSV provides the essential planning policy framework to accommodate housing that is decent, appropriate and affordable. However, uncertainty on the delivery of the extent of housing proposed by the DRLLP PSV is a possibility, particularly in the short term (despite exceeding targets in the last 10 years). This is mainly in response to the uncertainty in how the UK will leave the EU and how this will affect house building/labour etc. Improved access to decent, appropriate and affordable housing is considered more certain for the medium to long-term.</p>	<p>Permanent, provided affordable housing assigned as social rented/Lond on affordable rent and intermediate housing remains so in perpetuity.</p>

	<ul style="list-style-type: none"> • Applicants are encouraged to exceed minimum internal space standards (policy H5) • External amenity space be designed to support an appropriate balance of informal social activity and play opportunities for various age groups (policy H5); and • policy H5 includes clear cross reference to housing guidance and standards set out in the Draft London Plan <p>Overall, it is considered that the housing policies make a significant contribution to positively addressing the key sustainability issues for housing, outlined in Table 4. Deliverability of housing completions (particularly in the short term and more likely in locations outside of Opportunity Areas) may be somewhat uncertain given the uncertainty on how the UK will leave the EU but this is expected to be rectified in future years. Similarly, delivery of necessary infrastructure to support housing and associated population growth is uncertain. Provision of infrastructure or lack of will likely have significant impact on people's enjoyment of their home.</p>		
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Recommendations for monitoring likely significant and uncertain effects

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

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

5C7 LIVEABILITY AND PLACE

5C7.1 This section of the SA relates to the sustainability performance of the Local Plan against:

Objective 7: To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.

5C7.2 To achieve this objective, plan policies should protect and enhance the quality and quantity of open space and the public realm; reduce the proportion of the public realm where noise precludes conversation or where other environmental factors (e.g. fumes) make it unpleasant to be; promote community engagement; promote interactions between different sectors of the community; promote good governance, promote wellbeing and help to make people feel positive about the area where they live; promote child-friendly buildings and places; promote Lambeth as a place that people want to put down roots rather than just pass through; support the provision of quality, affordable and healthy food; help all Lambeth communities feel they are valued and are part of their neighbourhoods; encourage people to take greater responsibility for their neighbourhood; and help people lead environmentally sustainable lives.

Relevant policy objectivesNational Level

5C7.3 The National Planning Policy Framework 2019 contains a number of policies that seek to improve liveability of places. These include policies on ensuring vitality of town centres, promoting healthy and safe communities and achieving well-designed places. For example paragraph 127 states planning policies and decisions should ensure developments establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.

Regional Level

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

Baseline conditions and existing issues

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

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

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

- 5C7.8 Lambeth combines areas of affluence with areas of severe poverty and deprivation. The most deprived areas are spread throughout the borough but are particularly concentrated in Coldharbour and Vassall wards in Brixton and in parts of Knights Hill ward, in the south of the borough. The most affluent areas include the Thames-side part of Bishops ward, parts of Clapham and the Dulwich border area of Thurlow Park. 13 of Lambeth's super output areas are in the top 10 per cent nationally, which is a rise as in 2010 only eight areas were in this range (SOB report 2016).
- 5C7.9 The Lambeth residents survey 2016 provides some useful baseline data relevant to SA Objective 7. Community cohesion in terms of residents seeing their local area as a place where people from different backgrounds get on well together is both high and improving. In 2016 nine in ten (94%) residents see their local area as a place where people from different backgrounds get along well together, up from 87% in 2015. This agreement in relation to cohesion issues is in line with the 93% recorded previously in 2014. Just 3% of residents disagree that residents from different backgrounds get on well together (Lambeth residents survey 2016).
- 5C7.10 Importantly, this perceived high level of community cohesion is evident throughout the borough with between 92% and 95% of all residents per neighbourhood area agreeing that their local area is a place where people of different backgrounds get on well together. It should be noted that data collection in this research was completed shortly before the EU referendum and the post-Brexit spike in hate crime that has been reported nationally. Disagreement that the local area is a place where people of different backgrounds get on well together does not vary significantly between ethnic groups. There is also no significant variation between those who state English is their first language and those who state it is not. While this is also the case when responses are viewed by disability, those without a long term illness or disability are significantly more likely than those who do to agree at this community cohesion question (89% and 98% respectively). Sexuality is the equalities strand where views on how well people of different backgrounds get on vary most obviously, with agreement dropping significantly to 81% among Lesbian/Gay/Bisexual residents compared to 95% of those who are heterosexual. Furthermore, 12% of Lesbian/Gay/Bisexual residents disagree that this is the case (Lambeth residents survey 2016).
- 5C7.11 It is also notable that irrespective of how long residents have lived in the borough, at least nine in ten of each group believe that their local area is a place where people from different backgrounds get on well together, while the number of residents who express dissatisfaction with their local area is low. It can be observed that among those with this viewpoint the proportion who feel that people of different backgrounds get on well together rises to 18%, a proportion that is significantly higher than the survey average of 3%. On this basis, cohesion issues may be an influence on wider neighbourhood perceptions in a small number of cases (Lambeth residents survey 2016).
- 5C7.12 Among Lambeth residents there is a strong sense of belonging to neighbourhoods. Most people feel like they belong to their neighbourhood (87%) and would speak highly of it (83%). Alongside this around four in five would be willing to work together with others on something to improve their neighbourhood (83%), say that the friendships and associations they have with other people in the neighbourhood mean a lot to them (81%), and that neighbours help each other (79%) (Lambeth residents survey 2016).

Box 5: Changes in perceptions of neighbourliness 2014 to 2016

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

(Lambeth residents survey 2016)

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

Box 6: Length of residence in the borough (2014-2016)

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

(Lambeth residents survey 2016)

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

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

Box 7: Measures of community cohesion and neighbourliness by area

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

(Lambeth residents survey 2016)

5C7.15 As a collaborative council Lambeth seeks opportunities to work with its residents and to enable them to deliver community improvements. When considering their willingness to work together with others on something to improve their neighbourhood those most likely to agree they would do this include:

- Streatham residents (88%);
- Those aged 55-64 (87%) and 35-44 (84%);
- Those who have lived in the borough 5-10 years (84%) or 10 years or more (84%).

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

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

Likely evolution without the DRLLP PSV 2020

5C7.16 The National and Regional policies provide a good framework for promoting developments enhancing social inclusion, however they lack detail, for example, precise amounts of affordable housing and design characteristics appropriate for Lambeth. In the absence of a new Local Plan, adopted Local Plan 2015 policies will be considered out-of-date with National Planning Policy Framework, and Neighbourhood Plans could be prepared that propose a level or type of development that is consistent with national policy but may not be consistent with the council's vision for Lambeth, or what the council has traditionally supported. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of Policies

5C7.17 This section examines the likely significant effects of implementing the DRLLP PSV 2020 policies on SA Objective 7 Liveability and Place. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the proposed Plan.

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

D1 – Delivery and monitoring	S3 - Schools
D2 – Presumption in favour of sustainable development	T1 – Sustainable travel
D3 – Infrastructure	T2 – Walking
D4 – Planning obligations	T3 – Cycling
D5 - Enforcement	T4 – Public transport infrastructure
H1 – Maximising housing delivery	T5 – River transport
H2 – Delivering affordable housing	T7 – Parking
H3 – Safeguarding existing housing	T10 – Digital connectivity infrastructure
H4 – Housing size mix in new developments	EN1 – Open space, green infrastructure and biodiversity
H5 – Housing standards	EN2 – Local food growing and production
H6 – Residential conversions	EN5 – Flood risk
H7 – Student housing	Q1 – Inclusive environments
H8 – Housing to meet specific community needs	Q2 – Amenity
H9 – Hostels and houses in multiple occupation	Q3 – Safety, crime prevention and counter terrorism
H10 – Gypsy and Traveller needs	Q4 – Public art
H11 – Estate regeneration	Q5 – Local distinctiveness
H12 – Build to rent	Q6 – Urban design: public realm
H13 – Large-scale purpose-built shared living	Q7 – Urban design: new development
ED1 – Offices (B1a)	Q8 – Design quality: construction detailing
ED3 – KIBAs	Q9 – Landscaping
ED4 – Non-designated industrial sites	Q10 - Trees
ED5– Work-live development	Q11 – Building alternations and extensions
ED7 – Town centres	Q12 – Refuse/recycling storage
ED8 – Evening economy and food and drink uses	Q14 – Development in gardens and amenity spaces
ED9 – Public Houses	Q15 – Boundary treatments
ED10 - A2 uses, betting shops and payday loan shops	Q16 – Shop fronts
ED11 – Local centres and dispersed local shops	Q17 – Advertisement and signage
ED12 - Markets	Q18 – Historic environment strategy
ED13 – Visitor attractions, leisure, arts and culture uses	Q19 – Westminster World Heritage Site
ED14 – Hotels and other visitor accommodation	Q20 – Statutory listed buildings
S1 – Safeguarding existing social infrastructure	Q21 – Registered parks and gardens
S2 – New or improved social infrastructure	Q22 – Conservation Areas
	Q23 – Non-designated heritage assets: local heritage list
	Q24 – River Thames
	Q25 - Views

Q26 – Tall buildings
 Q27 – Basement development
 PN1 – Waterloo and South Bank
 PN2 – Vauxhall
 PN3 – Brixton
 PN4 – Streatham
 PN5 – Clapham

PN6 – Stockwell
 PN7 – West Norwood/Tulse Hill
 PN8 – Kennington/Oval
 PN9 - Herne Hill
 PN 10 – Loughborough Junction
 PN11 – Upper Norwood/Crystal Palace

Delivery and Monitoring policies D1 – D5

5C7.19 Overall it is considered that Delivery and Monitoring policies, in particular D1, D3 and D4, will result in significant positive effects on SA Objective 7. This is because the policies seek to ensure partners are involved in delivering sustainable development, that local distinctiveness is enhanced, infrastructure is in place to support growth (although actual delivery can be uncertain) and planning obligations are used for local improvements for example infrastructure, public realm improvements, and highways and traffic works. However, policy D5 states that enforcement will be prioritised according to the harm to amenity caused and resources available, and that investigations will be carried out proportionately in relation to the breach of planning control identified. It is arguable whether this promotes good governance, as identified in the sustainability framework as an appraisal prompt question for SA Objective 7. There is some concern that cumulative impacts may not always be avoided with this proposed policy approach. It is noted that the policy approach emanates from officer resourcing.

Housing policies

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

5C7.21 Policy H4 provides for a range of housing sizes from one bedroom units to 3-bed units and more. This enables older people the option to downsize and remain in the borough or their local area, and provides provision of families with larger sized units. Policy H5 requires minimum external amenity space standards for all residential units, including non-self-contained accommodation, and communal accommodation that meets certain policy requirements, providing a sense of place and creating social cohesion among residents. The Local Plan also makes provision of housing to meet specific community needs, across a range of tenures. Policy H8 should result in more sustainable, mixed use social environments that promote social cohesion and places where residents of this accommodation type can feel a sense of place to the local area. It makes provision for housing to meet specific community needs, benefits the more vulnerable groups of society (for example older persons, those with significant

mental or physical health limitations), and offers a housing choice that enables Lambeth residents to remain in the borough should they so wish. SA recommendation 27 on the DRLLP for the policy team to reconsider the lack of visitor car-parking provision for specific needs housing was further supported with respect to achieving SA objective 7 and helping promote long-term social cohesion, engagement and sense of place for these residents. The response to this recommendation is noted and accepted. A minor change has been made as a result of this recommendation, relating to visiting health and care professionals. Avoiding an over-concentration of hostels and HMOs in an area seeks to protect residential amenities of neighbourhoods, while other parts of policy H9 seek to help individuals that require such forms of housing to feel valued and part of the neighbourhood by ensuring the housing is appropriately located (i.e. accessible to range of services and facilities). Continued safeguarding of the existing gypsy and traveller site should also result in sense of place feelings for those in the gypsy and traveller community.

5C7.22 The residents survey 2016 found that those who rent from the council are among those most likely to disagree that they belong to their neighbourhood. Overall it is considered that policy H11 on estate regeneration has potential to help address this and provide an improved physical and social environment to promote social cohesion and sense of place. For example increased permeability and integration into the existing urban fabric, improved access and public realm and new routes through estates as appropriate. Estates will also have to comply with the Lambeth Housing Design Principles. SA recommendation 50 on the DRLLP suggested that 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 was therefore recommended that the policy team be satisfied there is policy provision to ensure this (SA recommendation 50). No change was made as a result of this recommendation as the policy team noted that this is considered to be adequately addressed through policy H5(c). Policy H5(c) ensures that communal amenity space is overlooked by habitable rooms to ensure safety and surveillance. The response is noted and considered to appropriately address the safety and surveillance concern relating to policy H11.

5C7.23 Large-scale purpose-built shared living will not appeal to all people but offers a housing choice for those (likely young and/or single) who wish to live in Waterloo and Vauxhall, that may not otherwise be able to do so. Limiting this housing type to these locations and avoiding over-concentration of similar uses (like purpose-built student housing) help protect residential amenity, neighbourliness and enable these areas to be places people want to put down roots, as well as recognising these locations as suitable for housing that may encourage shorter-term occupation. In the SA on the DRLLP it was recommended that the policy team may wish to consider defining Waterloo and Vauxhall as their respective Opportunity Area designations (SA recommendation 51). As a result of this recommendation, paragraph 5.120 has been amended to read: 'Proposals of this nature should be located in Waterloo and Vauxhall (Opportunity Areas) because these have been identified...'. This is considered to appropriately address SA recommendation 51 on the DRLLP. It is also considered that purpose-built shared living by definition has the potential to develop a sense of community, thereby contributing to the achievement of SA Objective 7 for those occupiers.

5C7.24 ***Economic Development and Town Centres policies ED1, ED3-ED5, ED7 – ED14***
Overall it is considered that the economic development and town centre policies should result in positive effects on SA Objective 7. Policy ED1 seeks to protect office floorspace. Mixed-use schemes will be supported provided there is no loss of office

floorspace. This helps achieve mixed-use physical and social environments that promote sustainable lifestyles, enabling the potential for people to work locally to where they live. Similarly policy ED3 also protects KIBAs, thereby ensuring a quantum of land available for employment use and therefore provide an environment in Lambeth where people have opportunity to live and work locally. Flexible workspaces and suitable spaces for micro, small and medium-sized enterprises are encouraged in policy ED4 in development proposals for new B class business floorspace greater than 2500m², also contributing to wider mixed-use environments and long-term social cohesion and sustainable lifestyles. The policy also supports intensification of business uses on non-designated industrial sites. Policy ED5 makes provision for work-live development. Combined work-live units contribute to the range of homes and the range of business premises in the borough and can offer a number of benefits including a reduction in traffic, more efficient use of land, minimising business start-up costs, and supporting flexible working, thereby helping achieve SA Objective 7 as well as SA Objectives 6, 9, 17 and 18. Policy ED6 on railway arches seeks to improve the immediate environment around arches, including public realm. It includes opening up of routes that contribute to the 'Low Line' project and thus helps protect and enhance the quality and quantity of open space and the public realm, as well as promote wellbeing and help to make people feel positive about the area where they live. It is considered the policy helps achieve SA Objective 7.

5C7.25 Allowing residential above ground floor in town centres (policy ED7) helps provide sustainable, liveable mixed use physical and social environments that promote long-term sustainable living, sense of place and social cohesion. Policy ED7 also seeks to support the vitality and viability of town centres, for example protecting markets and areas of specialist shops, local shops and other local services will help promote interactions between different sectors of the community and contribute to feelings of sense of place and social cohesion. The policy also contains design guidance in addition to the design policies in Section 10 of the Local Plan which further assists in producing well designed and liveable town centres.

5C7.25 Policy ED8 Evening economy and food and drink uses has been improved to better ensure liveability and place of town centres and help make people feel positive about their area. Evening and food and drink uses will not be permitted where this would cause unacceptable harm to community safety or the amenity of neighbouring residential areas or sensitive uses as a result of (among other things) noise, litter, increase in anti-social behaviour, impact of delivery vehicles/services and traffic generation. Opening hours of hot food takeaways may be controlled through conditions where necessary to manage impacts on neighbouring residential amenity. This policy contributes to the liveability and place of town centres and surrounding environments. The policy seeks to avoid stopping up of public highway with outdoor seating. A SA recommendation on the DRLLP 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 was considered the draft Plan did not contain clear policy on this and it was recommended that it be revisited to ensure that it is appropriately managed, either by other Local Plan policy or by the council through public highway permits (SA recommendation 52). It was further argued that better control of these sandwich/A-frame board advertisements would help improve permeability and accessibility of town centre streets, and improve walking routes (for example in Brixton) and better deliver one of the strategic outcomes of the Transport Strategy 2019: 'Pedestrians have genuine priority on our streets, with the whole street environment tailored to their needs' and achieve draft revised policy T2(e). The policy team noted that the approach to A-boards for advertisements is dealt with in policy Q17 Advertisements and signage. Furthermore, the supporting text to policy

Q17 has been updated to reinforce that A-boards are not permitted on public highways, where this can be controlled. New supporting text paragraph 10.89 has been inserted into policy Q17 as follows: 'On-street advertisements will be assessed against policies Q1, Q6 and T2'. The response is noted and the amendment to policy Q17 is considered appropriate to address the recommendation as policies Q1 (Inclusive environments), Q6 (Urban design: public realm) and T2 (Walking) seek to ensure safe, user-friendly pedestrian routes while contributing to a sense of place and a liveable environment. Policy ED9 on Public Houses will likely provide significant positive effects in terms of SA Objective 7. Pubs often play a valuable role in local community life, providing a hub for social interaction, and contributing to the identity and character of an area. If a public house is considered to have townscape or heritage value, the council will seek to retain the building and any external features of interest, also contributing positively towards the attainment of SA Objective 7.

5C7.26 Overall it is considered that policy ED10 will result in positive effects on SA Objective 7. It seeks to control the number of A2 use premises, betting shops and payday loan shops in town centres, which can lead to a negative impact on the vitality and viability of town centres, and/or increased perception of crime or fear of crime, including anti-social behaviour. It is considered that the policy contributes to making people feel more positive about the area they live, and a sense of pride and place for their local town centre. While it is noted that policy ED10 will likely result in positive effects for Lambeth in regards to limiting A2 uses, betting shops and payday loan shops and the relationship to crime and anti-social behaviour, it is acknowledged that this may, in some cases, result in displacement of demand and impacts on neighbouring boroughs. This can be acknowledged in the Statements of Common Ground with neighbouring boroughs.

5C7.27 Policies ED11– ED14 are also likely to result in positive effects on liveability and place. Policy 11 recognises the role local centres play for residents and seeks to ensure key local retail uses are retained at a local scale to meet day-to-day needs of communities, particularly more vulnerable groups with reduced accessibility and/or mobility or those with anxiety issues in public places. Any loss of local centre premises must be justified through stringent marketing requirements, thus rigorously assessing sustainability of local centres and achieving Objective 7 as best is viably possible. Policy ED12 makes provision for new markets provided that existing shopping facilities or markets located within town centres are not harmed and local amenity and traffic is not adversely affected. The policy protects existing indoor and street markets which in some areas of the borough, such as Brixton, will likely result in significant positive effects on liveability and place and the prompt questions/targets set out in the sustainability framework. As outlined above it is further recommended that supporting text could be strengthened to acknowledge the social value local markets contribute (Amend 1st sentence of supporting text para 6.87 as follows: 'Markets add to the vibrancy, social value and character of local areas.') This recommendation has been accepted and the DRLLP PSV has been updated accordingly. Policy 13 seeks to safeguard and improve leisure, recreation, arts and cultural facilities in the borough, particularly in the CAZ, Vauxhall and Waterloo Opportunity Areas and town centres, all of which provide good social environments to promote community engagement and interaction. Improvements to public realm associated with this use may be sought through planning obligations, further seeking to meet targets of SA Objective 7. Temporary use of open space and public realm for creative pursuits is supported, subject to other requirements and open space is expected to be returned to its previous use with improvements to the quality of the space. This is considered to result in positive effects on SA Objective 7 and protect and enhance the quality of open space. Policy ED14 on hotels and other visitor accommodation has been improved (compared to Local Plan 2015) taking account of

existing levels of hotels in particular areas of the borough and ensuring new provision does not unacceptably harm the balance and mix of uses in the area, including services for the local residential community. This helps achieve better sense of place and long-term social cohesion for local residents. Only strategically significant serviced visitor accommodation will be supported in the Vauxhall Opportunity Area where it does not compromise local amenity or the balance of local land uses. No additional visitor accommodation will be permitted in the Waterloo boundary of the CAZ. Proposals for new visitor accommodation should make a positive contribution to the townscape and extensions or new accommodation should include an assessment of impact on neighbouring residential amenity and visitor management plans should assess impact of visitor numbers on the local area. It is considered this policy positively contributes to the achievement of SA objective 7.

Social Infrastructure policies S1 - S3

- 5C7.28 Policies S1, S2 and S3 will likely result in significant positive effects on liveability and place. Adequate social infrastructure is necessary to ensure environments are liveable and sustainable. Policy S1 offers provision for safeguarding existing social infrastructure, promotes the most effective use of community premises for different and changing priorities and needs, and supports change of use between D1 and D2 use classes where existing use is no longer needed, or it is re-provided, or development will enable delivery of approved strategies for service improvements. Policy S2 seeks to ensure adequate social infrastructure provision is available for residents. Development proposals for more than 25 residential units should be supported by an assessment of anticipated impact on social infrastructure, and should include appropriate provision to meet the additional need that will arise from the new residential development. Similarly, development proposals for more than 500 residential units should incorporate suitable childcare provision to meet additional need arising from the development that cannot be met from existing provision. This helps ensure a good standard of living and promotes a healthy lifestyle. SA recommendation 47 of the DRLLP on outdoor/child play space for nursery and childcare provision was accepted by the policy team and supporting text has been added in the DRLLP PSV. Nurseries and childcare facilities should include access to an outdoor play area, located or screened away from roads causing poor air quality. This supports achievement of SA Objective 7, particularly in relation to children.
- 5C7.29 Policy S3 on schools makes provision for the shared use of schools for wider community use. School places are an important part of liveability by providing a place where people want to settle rather than just pass through. Provision of social infrastructure is considered crucial in producing successful social environments and improved social cohesion. Positively, most school projects outlined in the Infrastructure Delivery Plan have funding in place to deliver the projects that seek to increase school place numbers.

Transport policies T1 – T5, T7 and T9

- 5C7.30 Appropriate transport infrastructure, particularly public transport and active travel networks (particularly given the low car ownership levels in Lambeth), are critical components in designing liveable places and communities. Sustainable patterns of development that minimise the need to travel and reduce dependence on the private car are supported in policy T1 of the DRLLP PSV 2020. Overall it is considered that policies T1 – T5 and T7 will likely result in significant positive effects on achieving SA Objective 7. These policies seek to increase walking and cycling journeys and improve their infrastructure (including safety and accessibility); improve public transport infrastructure including accessibility, capacity, and connectivity; promote effective use of the River Thames and; provide parking only where it is necessary. Submission of travel plans with all development schemes seeks to mitigate effects on

liveability and place, promote sustainable travel and minimise number of car trips. It is considered that the policies seek to reduce the proportion of public realm where environmental factors such as car fumes make it unpleasant to be and help people lead environmentally sustainable lives - prompts/targets for achievement of SA Objective 7. However, it is important to note that until improvements to transport accessibility are delivered; it is unlikely people of some protected groups (i.e. disabled, pregnancy and maternity, age) will feel the physical environment promotes sustainable lifestyles and a sense of place for them.

5C7.31 Policy T9 on Digital connectivity infrastructure ensures that the siting, height and design of equipment is minimised and does not cause harm to the character or appearance of the areas or building on which it is located, and is not visually intrusive in street scene or creates unacceptable clutter. This is considered to positively contribute to SA Objective 7.

Environment and Green Infrastructure policies EN1, EN2, EN5

5C7.32 Overall, the environment policies will likely result in significant positive effects on SA Objective 7. Policy EN1 (including application of the urban greening factor) will be a key mechanism to enhancing the quality and quantity of open space. Green infrastructure and the protection of open space improves sense of place and creates healthier, more attractive places that people value, want to stay and set down roots in, while also improving the amenity of local environments. It also makes places more child-friendly. Local food growing (policy EN2) initiatives have substantial potential to bring different communities together, promote social engagement, interaction and learning, provide opportunities for more sustainable living and help people feel more positive of the area they live. This policy supports the provision of quality, affordable and healthy food. Flood risk policy (EN5) seeks to minimise the impact of flooding in the borough and make developments as safe as possible.

Quality of the Built Environment policies Q1 – Q27

5C7.33 Overall it is considered policies Q1 – Q27 all seek to provide well-designed, liveable, physical and social environments that contribute to sense of place and long-term social cohesion.

5C7.34 Policy Q1 seeks inclusive environments. Design of developments should promote child-friendly housing and environments. Policy Q2 Amenity protects the amenity of existing/future occupants, neighbours and the visual amenity of the community as a whole. These policies should result in significant positive effects on the achievement of SA Objective 7, as well as a number of other SA Objectives (e.g. health and wellbeing, access and services, equalities, transport and built and historic environment).

5C7.34 Policy Q3 on safety, crime prevention and counter terrorism, and particularly supporting text paragraph 10.6, outlines design responses which will not be considered appropriate and positive design solutions that will be encouraged. It is considered these effectively contribute to creating an environment conducive to achieving liveability and sense of place in Lambeth.

5C7.35 Policy Q4 addresses public art, which has potential to create significant positive effects on liveability and place and help make people feel good about where they live and feel valued and part of their neighbourhood. It is considered this would be most effectively achieved if public art has a relationship with protected equality groups and other local groups/communities. It is noted the policy states 'culturally vibrant places play an important role in enriching Lambeth's communities. The council will encourage investment in cultural programming and the production of new work and

events that support, celebrate and reflect our diverse communities’.

- 5C7.36 Policies Q5 to Q8 should result in positive effects for design of developments and surrounding environments. Policy Q6 Urban design public realm should result in significant positive effects on SA Objective 7 as should policy Q7. The policies in the DRLLP PSV now include reference to climate change adaptation measures, that will likely improve liveability and place experienced in hotter, drier climates (for example increased urban shading, green infrastructure). New developments will also need to include climate change mitigation and adaptation measures and be flexible and adaptable internally for different uses and changing circumstances over the lifetime of the development.
- 5C7.37 Landscaping (policy Q9) and trees (policy Q10) contribute to positive feelings of a sense of place and pride for people, and often provide an environment conducive to social interactions and sustainable lifestyles.
- 5C 7.38 Policy Q14 seeks to control development in gardens and it is considered this policy effectively maintains liveable physical and social environments, protects amenity, and helps people feel positive about where they live. Effectively, the policy allows for development in larger gardens while safeguarding some amount of garden space for the existing and new dwelling. However, it is recognised that some people may consider their ability to extend (policy Q11) or build in gardens (or land most recent used as gardens) (policy Q14) is restrictive and therefore might adversely impact on their feelings of sense of place/enjoyment of home/ability to stay in the local area with a growing family. However, overall, it is considered the policies seek to achieve well-designed neighbourhoods that respect local distinctiveness and local amenity while allowing for some development on sites with larger gardens.
- 5C7.39 Policies Q18 to Q23 seek to preserve or enhance heritage assets in the borough. Heritage contributes to feelings of sense of place and belonging, liveability and place, but also may place development restrictions on buildings which may adversely impact on owners / occupiers. However, it is generally considered that owners and occupiers into such areas / buildings are likely drawn by the heritage values and therefore aware of such restrictions. It is considered that these policies will likely result in positive effects with respect to SA Objective 7.
- 5C7.40 Providing a continuous river walkway with publicly accessible spaces / routes supports SA Objective 7 and enhancing the quality and quantity of open space and public realm. Policies Q25 (views) and Q26 (tall buildings) should also result in positive impacts for liveability and place, particularly in combination with other local plan policies. Cumulative effects of basement development are taken into account in determining that there will likely be unacceptable impacts, and therefore adverse effects (at least temporarily) to liveability and place. Applicants will be required to demonstrate reasonable consideration to potential impact of construction on the amenity of neighbours.
- Places and Neighbourhoods policies PN1 – PN11***
- 5C7.41 Policy PN1 on Waterloo will likely result in significant positive effects on liveability and place. It promotes social interactions between different sectors of community, and community engagement through its role for culture and arts, as well as tourist, leisure and entertainment facilities. Mixed uses developments, including affordable housing, coupled with measures such as safeguarding Lower Marsh/The Cut/Leake Street for its specialist and independent retailing are encouraged, which further promotes social environments conducive to supporting social cohesion and sense of place. The area has good transport links, and the policy supports improvements to transport capacity and accessibility, as

well as improved healthcare facilities, all of which support long-term sustainable living. Green spaces will be protected and enhanced, contributing further to a sense of place. Development at the Hungerford Car Park will only be supported if this promotes the expansion of the arts and cultural activities of Waterloo and allows for the expansion of Jubilee Gardens. This should deliver enhanced quality and quantity of open space provision in this area of the borough.

- 5C7.42 Policy PN2 on Vauxhall will also likely result in significant positive effects in terms of SA Objective 7. A new town centre will be created that will include mixed-use development for the range of town centre uses. The policy also seeks to reinforce neighbourhood destinations, consolidate and expand cultural and evening economy uses as part of a network of activities between places of interest and connecting and improving existing green spaces and creating new and enlarged open spaces where possible. Public realm improvements are proposed, particularly in terms of public transport infrastructure, walking and cycling, as well as removal of the gyratory (one way system) which should result in significant positive impacts on the physical environment of the area.
- 5C7.43 Policy PN3 for Brixton should result in significant positive effects for SA Objective 7. It seeks to safeguard and promote the multicultural and diverse town centre through sensitive regeneration, recognising local distinctiveness and details specific levels of A1 retail and A3/4/5 uses which are considered to be effective for achieving SA Objective 7. Local heritage and historic built environment and different character areas will be respected, public spaces improved and mixed used developments including residential, employment, cultural industries, leisure and entertainment. Provision of low cost and affordable workspace, traffic reduction measures and improvements to the quality of public transport all further contribute to maximising liveability and sense of place in Brixton.
- 5C7.44 Policy PN4 for Streatham will also likely result significant positive effects through improved accessibility and use of public transport, walking and cycling with measures to improve safety and accessibility of public realm and public transport facilities and through measures to reduce impact and dominance of road traffic and improve air quality. The policy seeks to improve 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. Improved vitality and viability of the two distinct hubs of Streatham will be supported and specific levels of A1 retail and A3/4/5 uses are sought. Landmark buildings providing destinations for people of the wider catchment, regeneration of the former Streatham Hill theatre, and mixed use developments including housing, will likely promote community engagement and result in people feeling positive about where they live.
- 5C7.45 Policy PN5 for Clapham seeks to provide a district centre that enhances its distinct character and historic environment and encourage provision for cultural, creative, visual and performing arts, street markets and other forms of community innovation while managing food and drink uses and the impact on amenity of evening economy (compliance with policy ED8). The policy sets its own specific maximum percentage targets for A1 retail and A3/4/5 across the centre as a whole. No additional pubs and bars or hot food takeaways will be permitted. Enhancements to the public realm to increase green infrastructure and improve safety accessibility and environment for pedestrians and cyclists will further promote a sustainable and liveable place. The policy will likely result in improved liveability and feelings of sense of place.
- 5C7.46 The council supports the role of Stockwell as a centre with a clear and distinguishable community focus and heart and a clear physical sense of place supported by its heritage assets. Improvements to housing estates and connections between housing estates as

well as improved environmental and accessibility conditions for pedestrians and cyclists will likely result in enhanced feelings of sense of place and improved community cohesion for Stockwell, as provided for in policy PN6.

- 5C7.47 It is considered that liveable, mixed-use physical and social environments should result in the West Norwood/Tulse Hill district centre being a sustainable and liveable environment, as a result of policy PN7. Five focal areas are proposed for development and investment that support SA Objective 7. Improved quality and variety of retail floor-space, education uses and other community facilities including cultural uses and housing are proposed for the centre as a whole. Improvements to walking and cycling routes and increased green infrastructure and access to open space is promoted, as is improved air quality. Overall it is considered that positive effects should result from policy PN7.
- 5C7.48 The policy PN8 for Kennington/Oval seeks to support growth of the area as an important residential and employment area while enhancing the quality of its existing well-defined character and sense of place, and seeking maximum community benefit from development proposals. High quality regeneration for mixed use of the Oval gasworks and adjacent Tesco sites is expected. The policy also seeks to improve the relationship of the stadium with the adjoining area, particularly improved linkages and public realm and mitigate any harmful impacts of large numbers of visitors on the surrounding area. The policy also seeks to improve the quality and extent of shopping and other town centre uses, including reuse of the Oval House Theatre, housing and employment. It is considered that the policy should result in significant positive effects on the current baseline of the environment, resulting in improved liveability and sense of place.
- 5C7.49 Policy PN9 for Herne Hill also supports further improvements to the quality, safety and accessibility of the public realm, particularly between the station and adjoining areas, and walking and cycling links. Opportunities to deliver new residential and commercial uses whilst enhancing sense of place including the historic character will be supported. Proposals to increase green infrastructure, access open space and improve air quality will be supported and these help to achieve SA Objective 7.
- 5C7.50 It is considered that the policy for Loughborough Junction (PN10) should result in significant positive effects for the area in terms of improving liveability and providing a better sense of place. The policy seeks to radically improve the physical environment of this deprived community. The policy seeks to make better use of under-used spaces and places to increase public safety and appearance, bring forward new housing where appropriate and support improvements to retail and leisure offer so that essential services are within walking or cycling distance of their homes. This demonstrates a desire to achieve sustainable lifestyles and improved social cohesion for the area. The council will also work with local groups to improve public transport infrastructure including step-free access at a potential new station stop on the London Overground. Should this be delivered (and it is noted no progress has been made according to the IDP); this will help achieve more liveable, sustainable lifestyles. However, the degree of sense of place and true sustainable lifestyles will likely be limited for some communities of the local area (e.g. disabled, parents and carers of young children, older people) until step-free improvements are delivered.
- 5C7.51 Policy PN11 for Upper Norwood also supports opportunities for physical improvements that will enhance and improve the centre's character, increase green infrastructure and improve traffic, safety, accessibility and environmental conditions for pedestrians and cyclists in the area as well as transport links to other parts of London. The policy also seeks a vibrant arts and cultural scene and growth in the creative and digital industries that should result in positive impacts in relation to SA Objective 7.

- 5C7.52 While the places and neighbourhood policies do provide the policy framework to deliver fully accessible public transport; it is noted that until improvements to accessibility of public transport (including step-free access), and safe and accessible walking and cycling environments are delivered, it is likely that the degree to which sense of place and true sustainable lifestyles is achieved will likely be limited (at least for in the short and medium term) for some members of the community.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

- 5C7.52 Overall, and taking into account the criteria outlined in the Sustainability Framework, it is considered likely that the Revised Lambeth Local Plan Proposed Submission Version 2020 policies should have a significant positive effect albeit with some element of uncertainty on recognising the existing baseline of population groups and in promoting social cohesion, sustainable lifestyles and sense of place.

Table 14: Summary of assessment of effects of the DRLLP PSV 2020 on liveability and place

Assessment of effects of the DRLLP PSV 2020 on SA objective 7	Score	Justification of Score	Timescale and probability	Permanent or temporary
To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	++/?	<p>Generally, it is considered that the DRLLP PSV contains good provisions that work well together to encourage a sense of place, community identity and belonging. Not one policy will solely achieve this; but each contributes an aspect that should result in significant cumulative positive effects in creating a borough where communities feel they belong, where they identify with and wish to put down roots and where they feel a sense of place, in so far as planning is able to facilitate.</p> <p>Mixed-use developments, including housing are proposed for Opportunity Areas, major centres and where public transport accessibility is generally good. These areas will likely result in increased densities and population. Necessary infrastructure to support this growth will need to be in place before occupation of developments in order to effectively achieve SA Objective 7 in a timely manner. There is uncertainty whether such infrastructure will always be delivered in time (see Infrastructure Delivery Plan 2019).</p> <p>The DRLLP PSV includes strong provision on the protection of existing social infrastructure, and seeks to ensure adequate social infrastructure provision is available for residents and accordingly proposals should include appropriate provision to meet the additional need that will arise from the new residential development.</p> <p>The DRLLP PSV seeks to ensure</p>	<p>It is considered that as areas of the borough are regenerated, and buildings are redeveloped it is likely that actions will be taken to help improve the sense of place and community identity and belonging. Therefore small scale achievements (e.g. redevelopment of a town centre park or square) and small scale new housing developments may be made in the short term.</p> <p>In the medium to long term, it is likely that house building rates will increase (particularly outside of Opportunity Areas) and town centres will be redeveloped in a manner that results in increased sense of place, identity and belonging. Similarly, as population grows due to new housing building, sufficient community facilities will need to be provided to reflect demand.</p> <p>Major transport developments and improvements are unlikely to be evident until the medium to long-term.</p>	Permanent and ongoing in terms of recognising and providing for specific needs of the community as population increases.

	<p>services and facilities are accessible and there continues to be opportunities for local employment.</p> <p>Public realm improvements are proposed for all town centres including new open space provision where possible and improved connectivity and accessibility by active travel and public transport is promoted through transport policies.</p> <p>Quality of the built environment policies provide a robust policy approach to achieve SA Objective 7. These policies have been significantly improved with regards to designing for climate change and it is particularly considered that adaptation considerations in design will help achieve liveable environments and sustainable lifestyles.</p>		
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Recommendations for monitoring likely significant and uncertain effects

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

- Proportion of vacant units in Brixton and Streatham Major centres, Clapham and West Norwood District centres and Waterloo and Vauxhall CAZ Retail Clusters.
- Modal Share – walking, cycling and public transport
- Number of cycle parking spaces provided in completed major developments
- Number of disabled parking spaces per completed major development
- Amount of open space lost through completed planning permissions
- Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score
- Infrastructure Delivery Plan updates
- Diversity of resident ethnicity
- Resident surveys on satisfaction parks and open spaces
- Resident surveys on perception of crime and level of safety in public
- Level of population churn

5C8. BUILT AND HISTORIC ENVIRONMENT

5C8.1 This section of the SA relates to the sustainability performance of the Revised Lambeth Local Plan Proposed Submission Version against:

- SA Objective 8: Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated heritage assets.

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

Relevant Policy ObjectivesNational Level

5C8.3 Section 16 of the National Planning Policy Framework 2019 relates to Conserving and Enhancing the Historic Environment. It states that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In terms of well-designed places, section 12 of the NPPF provides guidance. The Government attaches great importance to a well-designed and safe built environment in achieving the social objective of sustainable development.

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

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

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

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

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

This Historic England Advice Note updates previous guidance by English Heritage and CABE, produced in 2007. It seeks to guide people involved in planning for and designing tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process. The advice is for all relevant developers, designers, local authorities and other interested parties. In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications. It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of the local plan. Techniques such as characterisation and building height studies provide evidence to support a local height definition for tall buildings and the identification of appropriate locations in local plans. This can be used to create clear core strategic policies, site allocations and development management policies, supported by supplementary planning advice where appropriate.

Regional Level

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

Baseline conditions and existing issues

- 5C8.8 Lambeth has approximately 2,500 listed buildings. The vast majority of these are residential properties erected between 1800 and 1850; they are generally in good condition. Typically two or three structures are added to the statutory list each year. A local list of historically significant buildings (not on the national list) was established in 2010 with a priority being placed on properties outside conservation areas. The local list has been updated, most recently in April 2017 and the number of assets on the local list has increased based on the additional information available to the council.

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

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

Likely future evolution without the revised Plan

- 5C8.11 Heritage assets are likely to continue to be preserved through legislation. However, without the new Local Plan, the current adopted Lambeth Local Plan will become out-of-date in

2020. Applicable planning policies would be those contained within the London Plan and NPPF, both of which would not provide for the local character and context of Lambeth and design challenges of the built/natural/public realm may not be as effectively addressed at the local scale.

Assessment of revised Policies

5C8.12 This section examines the likely significant effects of implementing the proposed Revised Lambeth Local Plan Proposed Submission Version policies on SA Objective 8 Built and Historic Environment. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the proposed Plan.

5C8.13 The following policies have been screened as having potential for significant effects on this objective:

- D1 – Delivery and monitoring
- D2 – Presumption in favour of sustainable development
- D3 – Infrastructure
- D4 – Planning obligations
- H1 – Maximising housing growth
- H3 – Safeguarding existing housing
- H5 – Housing standards
- H6 – Residential conversions
- ED7 – Town centres
- ED8 – Evening economy and food and drink uses
- ED9 – Public Houses
- ED11 – Local centres and dispersed local shops
- ED12 - Markets
- ED13 – Visitor attractions, leisure, arts and cultural uses
- T2 – Walking
- T3 - Cycling
- T5 – River transport
- T10 – Digital connectivity infrastructure
- EN1 – Open space, green infrastructure and biodiversity
- EN2 – Local food growing and production
- EN4 – Sustainable design and construction
- Q2 – Amenity
- Q3 – Safety, crime prevention and counter terrorism
- Q4 – Public art
- Q5 – Local distinctiveness
- Q6 – Urban design: public realm
- Q7 – Urban design: new development
- Q8 – Design quality: construction detailing
- Q9 – Landscaping
- Q10 - Trees
- Q11 – Building alternations and extensions
- Q12 – Refuse/recycling storage
- Q14 – Development in gardens and amenity spaces
- Q15 – Boundary treatments
- Q16– Shop fronts
- Q17 – Advertisements and signage
- Q18 – Historic environment strategy
- Q19 – Westminster World Heritage Site
- Q20 – Statutory listed buildings
- Q21 – Registered parks and gardens
- Q22 – Conservation Areas
- Q23 – Non-designated heritage assets: local heritage list
- Q24 – River Thames
- Q25- Views
- Q26 – Tall buildings
- Q27 – Basement development
- PN1 – Waterloo and South Bank
- PN2 – Vauxhall
- PN3 – Brixton
- PN4 – Streatham
- PN5 – Clapham
- PN6 – Stockwell
- PN7 – West Norwood/Tulse Hill
- PN8 – Kennington/Oval
- PN9 - Herne Hill
- PN 10 – Loughborough Junction
- PN11 – Upper Norwood/Crystal Palace

Delivery and Monitoring policies D1 – D4

5C8.14 Overall it is considered that Delivery policies, in particular policies D1, D3 and D4, will result in significant positive effects on SA Objective 8. This is because the policies seek to ensure partners are involved in delivering sustainable development that enhances local distinctiveness, infrastructure is in place to support growth and planning obligations are used for local improvements for example enhancement of heritage assets, public realm improvements, and highways and traffic works. Policy D1 seeks to work with a range of partners to ensure sustainable development and regeneration opportunities are fully explored, including the beneficial use of vacant historic buildings commensurate with their conservation. Policy D4 seeks to use planning obligations to fund or provide local improvements and may include

mitigation of impacts on and/or enhancement of heritage assets; and local public realm improvements including streetscape, local public open space, play facilities.

Housing policies H1, H3, H5, H6

5C8.15

Overall it is considered that positive effects should result on the built environment from the housing policies. Although a high level of housing growth is proposed, such housing is expected to be well-designed, optimising housing delivery on all suitable and available brownfield sites, and optimise residential density in accordance with the Draft London Plan design-led approach, and it is considered that this can be achieved to support SA Objective 8. Policy H1 also supports the delivery of well-designed new homes on small sites. As a result of SA recommendation 53 on the DRLLP additional text has been included to clarify what is meant by 'well-designed' new homes on small sites (given all housing should be well designed). Supporting text paragraph 5.4 has been amended to include the following: 'Lambeth's Urban Design Code SPD provides guidance on optimising capacity through good design, including where new housing is proposed on small sites'. This additional text is consistent with Draft London Plan policy H2A(B) which states that boroughs should prepare area-wide housing design codes to proactively encourage increased housing provision as a minimum for small housing development such as residential conversions, extensions and/or ancillary residential buildings or infill development within the curtilage of a house. This is considered appropriate and positively supports the achievement of SA Objective 8, whilst recognising the forthcoming SPD. Furthermore, additional text has been added to the supporting text of policy H6 residential conversions to state that 'the acceptability of conversions of statutory Listed Buildings will be assessed on a case-by-case basis and with a presumption against harm to their significance. The Design Code SPD will provide further guidance on residential conversions, including in Conservation Areas'. Further guidance and standards relating to the design and quality of residential developments is set out in the Draft London Plan and associated guidance, as well as section 10 of the DRLLP PSV. This is considered to positively contribute to SA Objective 8 by ensuring protection of historic assets. The bringing back into use of long-term empty homes and derelict empty homes is supported.

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

5C8.16

It is considered that the economic development and town centre policies will result in significant positive effects on improving the quality, attractiveness, character and sustainability of the built environment (SA Objective 8), including protecting and enhancing the townscape/cityscape character and its contribution to local distinctiveness. Development in town centres will need to avoid blank walls and facades, be designed to add to the physical attractiveness of the area and provide for active frontages at ground floor level, all of which protect and enhance the vitality and viability of the centre (ED7) and also contribute to achieving SA Objective 8. Major redevelopment proposals will also need to re-provide small shop premises on affordable terms, which will contribute to maintaining cultural value and its contribution to local distinctiveness of townscapes in the retail offer they provide. The use of pavements for food and drink uses can positively contribute to improving the quality, attractiveness and character of the built environment, and policy ED8 ensures the width of the footway is adequate for this use without obstructing pedestrian flow or result in hazard for users, including people with disabilities, older people and families with small children. The SA on the DRLLP noted that SA recommendation 52 (ensuring management of sandwich boards on footpaths) made against SA Objective 7 was also applicable in achieving SA Objective 8. The policy response to the recommendation (see paragraph 5C7.25 above) is also noted and accepted against SA Objective 8. , and it remains applicable . Policy ED9 seeks to

protect public houses for their economic and social roles, but also seeks to retain these buildings where appropriate for their architectural / townscape character / heritage and cultural merit too. Policy ED9 seeks to retain public houses and proposals concerning them will be considered in terms of whether they would not result in the loss of a public house of heritage, economic, social or cultural value. It is considered that the policy support achievement of SA Objective 8.

5C8.17 It is considered the markets policy (ED12) positively contributes to enhancing cultural diversity and value in the borough by protecting existing markets and supporting new market proposals where other conditions are also met. It is considered that existing markets in the borough contribute valuably to townscape/cityscape character, cultural diversity, cultural value and social cohesion. Markets may also have a (undesigned) historical value to people. Policy ED13 should result in positive effects on SA Objective 8. It seeks to safeguard visitor attractions, leisure, arts and culture uses and lends itself to support possibilities for cultural events/activities, contributing to enjoyment of cultural and historical sites.

Transport policies T2, T3, T5, T10

5C8.18 Policies T2 (Walking) and T3 (Cycling) seek to provide physical environments (i.e. walking and cycling routes) conducive for active travel, that are accessible to all, and therefore contribute to the sustainability and quality of the built environment. Typically, when the quality and attractiveness of pedestrian and cycling routes is improved, there is greater use and enjoyment in walking and cycling. Improved walking and cycling environments can also increase access to and enjoyment and understanding of, historical and cultural features and areas. Existing and new piers support use of the River Thames for transport which contributes to a more sustainable built environment; however care must be taken to ensure the number of new piers does not result in adverse visual effects on the river setting itself, as well as any valued views or designated and non-designated heritage assets. Quality of the Built Environment policies will seek to manage / mitigate and/or avoid such effects. Overall, the transport policies are considered to have positive effects on SA Objective 8 by improving the sustainability of the built environment.

5C8.19 Policy T10 supports electronic communications equipment that does not cause harm to the character and appearance of the areas or building on which it is located, including the significance and setting of historic assets, and will not be visually intrusive in the street scene or create unacceptable clutter. Linked to this, the SA on the DRLLP noted that sandwich and A-frame boards on streets can also create unacceptable clutter. Electronic communications equipment and outdoor seating for food and drink uses are controlled footpaths, so sandwich boards which create the same adverse accessibility and visual effects should also be controlled. Accordingly SA 52 was accepted an amendment was made to the supporting text of policy Q17 in light of this (see paragraph 5C7.25 above).

Environment policies EN1, EN2, EN4

5C8.20 Policies EN1 and EN2 should result in significant positive effects on SA Objective 8, as policy EN1 seeks to protect open spaces and green infrastructure and increase their provision, including preventing development that would result in the loss, reduction in area or significant harm to a designated or proposed Local Nature Reserve or Sites of Importance for Nature Conservation. Policy EN1 also positively contributes to SA Objective 8 by improving the quality of, and access to, existing open space and green infrastructure, including those of nature conservation and heritage value. Application of the urban greening factor will improve the quality, attractiveness and sustainability of the built environment. Policy EN2 provides for

food growing spaces including temporary use of vacant or derelict land or buildings. Policy EN4 refers to promotes sustainable design and construction and the policy now seeks much more ambitious sustainability standards, BREEAM and BREEAM non-Domestic Refurbishments ‘excellent’ ratings and the encouragement of Home Quality Mark or Passivhaus design standards for new residential development. It is noted that the supporting text encourages all development to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation, unless it can be demonstrated that such provision is not feasible. The delivery of some types of renewables in conservation areas or on or within the settings of historic assets might not be appropriate. Historic England contain a series of notes covering the installation of renewables and low carbon technologies such as heat pumps, solar thermal and hydroelectric. The policy team may wish to consider adding the following to the end of paragraph 9.29: ... ‘that such provision is not feasible or adversely affects designated and non-designated heritage assets’. This recommendation had not been accepted by the policy team as this is covered under ‘feasibility’ and also in the Q policies, including reference to Historic England advice notes.

Quality of Built Environment policies Q2 – Q27

- 5C8.21 Overall, it is considered that the above policies should result in significant positive effects on the built and historic environment. Policies emphasise the need for well-designed buildings with use of quality materials where local distinctiveness is sustained and reinforced. This includes both local character and reflecting the cultural diversity of the Borough through appropriate architecture. All proposals will be expected to create positive and attractive environments. Policy Q4 on public art seeks to enrich Lambeth’s communities through culturally vibrant places, provision of places and spaces suitable for artistic and cultural programming and retention of good-quality public art, that all serves to enhance the character of the borough. Policies Q6 and Q7 and Q8 set out the expectations regarding the urban design of public realm, new developments and construction detailing, all of which work together to improve attractiveness, character and sustainability of the built environments through high quality design.
- 5C8.22 Policies Q9, Q10 and Q14 provide for landscaping, trees, green infrastructure and protection of gardens, and, together with urban design policies, should result in significant positive effects on SA Objective 8. Policy Q14 allows for development on sites that have larger gardens but also contains a number of safeguards to ensure an appropriate balance between development and protection of garden space and amenity is met. The policies, together with environment policies will also help to mitigate against poor air quality through the provision of green infrastructure, which also help improve quality and attractiveness of the built environment. Refuse/recycling storage and cycle storage (policies Q12 and Q13) areas are expected to be fully integrated into the design of development from the outset, helping to achieve a quality built environment that is sustainable and attractive.
- 5C8.23 Policies Q15 to Q17 should result in significant positive effects on the built environment, while policies Q18 to Q23 should result in significant positive effects on the historic environment, including archaeology and green spaces of heritage value. Views (in and out) of designated heritage assets are protected in these policies, as well as through policy Q25 which protects strategic views including panoramas, landmark silhouettes and roofscape views while also enhancing views. It is noted that views (either ‘to or from’, or ‘in or out’) in relation to non-designated heritage assets are not protected. Indeed, views are not mentioned in policy Q23 (unlike policies Q20 to Q22. Sa Objective 8 seeks to protect ‘valued views’. It is recommended the policy

team is satisfied there are no valued views worthy of protecting with regards to non-designated heritage assets. The policy team have responded that this is covered in policy Q25 Views and no further change to policy is required.

5C8.24 Policy Q18 Historic environment strategy will likely result in significant positive effects on SA Objective 8 as it seeks to prepare an Historic Environment Strategy (HES) to assist developers and other parties in understanding the justifications to policies Q19-Q26, all of which relate to historic built environment assets, the River Thames and tall buildings in the borough. Furthermore, the supporting text to policy Q18 states that the council will sustain or enhance the historic environment (prior to the development of an HES), use Historic England and other associated guidance to deliver best practice management and alteration of heritage assets, and promote access to and enjoyment of the historic built environment. Policy Q22 seeks to ensure the character or appearance of conservation areas are preserved or enhanced if development affects the area, and that the loss of historic structures in conservation areas is generally avoided. Policy Q25 acknowledges the important role roofscapes play in a viewer's appreciation of the wider cityscape. Green roofs should be supported to enhance these views of roofscapes.

5C8.24 Policies Q24 (River Thames) and Q26 (Tall and large buildings) should also result in positive effects on SA Objective 8. The supporting text of policy Q26 and Annex 11 identify potential locations where tall buildings are acceptable. Policy Q26 seeks to preserve the settings of heritage assets and ensure that where tall buildings are identified as appropriate they will not adversely impact on strategic or local views, design excellence is achieved, the proposal makes a positive contribution to public realm and townscape including at street level, whether individually or as part of a group; where proposed near existing tall building groups, proposals should follow the established principles of group composition such as noticeable stepping down in height around cluster edges; and amenity impacts (e.g. visual, environmental and functional impacts including microclimate, wind turbulence, noise, daylight and sunlight, reflective glare) are adequately addressed. It is considered the policy contains the necessary provisions to ensure proposals are rigorously assessed to mitigate adverse effects and achieve the best outcomes for the built and historic environment. Where tall buildings are proposed outside the identified appropriate locations, the applicant is required to provide a clear and convincing justification and to demonstrate the appropriateness of the site for the development with regards to heritage assets and the character of the local area (among other things). Where tall buildings are identified as having negative impacts on local views, heritage settings or townscape, proposals to lessen the adverse impact of the development will be encouraged. This is considered to have a positive impact on SA Objective 8 to improve and preserve the character and sustainability of the built environment and protect valued views and historic assets.

5C8.25 Basement development will be supported where it can be demonstrated that no unacceptable impacts will result to designated and non-designated heritage assets (among other criteria). The SA on the DRLLP recommended 'designated and non-designated heritage assets' be included in clause (a) instead of 'statutory listed buildings' and this recommendation (52) was accepted by the policy team for the DRLLP PSV. It was also recommended there be acknowledgement (even as supporting text) of archaeological value or potential that may be affected by basement proposals. The policy team have responded that this is already covered under policy and no further change is required.

Places and Neighbourhoods policies PN1 – PN11

5C8.25 Policy PN1 on Waterloo should result in significant positive effects on the built and

historic environment. The policy promotes and supports development and uses of an appropriate height, scale and form to reinforce Waterloo and South Bank's distinct identity, respecting strategic and local views and local contextual considerations, preserving the setting of heritage assets and the Outstanding Universal Value of Westminster World Heritage Site, and ensuring that design quality is worthy of a world city. The provision of cultural facilities and cultural events will be enhanced, particularly in the South Bank area to reinforce its role as an international cultural and leisure centre, and a high quality, permeable, safe and accessible public realm that is durable, well-designed and maintained to reinforce Waterloo's status as a world class centre is promoted. Green spaces will be protected and expanded. The policy also includes specific design considerations with regards to development on the one third of Hungerford car park and landscaping on the remaining car park area.

- 5C8.26 It is considered that policy PN2 for Vauxhall will also result in significant positive effects on SA Objective 8. The policy effectively enhances local character and distinctiveness through proposed use of railway arches as an active spine, seeks to expand and consolidate cultural and evening economy and make improvements to open space provision. The transport experiences will be improved by reducing the dominance of road traffic, replacement of the one way system with a two-way system and the building of a new modern bus station and canopy which will result in significant improvements to the built environment, as well as liveability and place (SA Objective 7). The policy also has specific design considerations for six distinct character areas in Vauxhall. Existing green spaces, connections to green spaces and public realm will also be improved.
- 5C8.27 Policy PN3 for Brixton should result in significant positive effects for the built and historic environment. A number of public realm improvements are proposed (including provision for public art), and sensitive regeneration that recognises local distinctiveness, the historic built environment and the distinctive multicultural, diverse town centre will be supported. The provision of new spaces for creative and digital industries are included in the policy, as are areas for theatre and arts facilities. It is considered the policy positively provides for cultural value and diversity.
- 5C8.28 Similarly, policy PN4 for Streatham supports development that is sensitive to the centre's conservation area status and valued heritage assets. It seeks to improve 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. The council will encourage property owners to work in partnership with other to remove assets from the Heritage at Risk Register.
- 5C8.29 It is considered that policies PN5 Clapham, PN6 Stockwell, PN8 Kennington/Oval, PN9 Herne Hill, PN10 Loughborough Junction and PN11 Upper Norwood/Crystal Palace will likely result in significant positive effects for the built and historic environment. All these policies seek to respect and enhance the character (including heritage where applicable) and assets of the centres and ensure they are community centres for people with improvements to public realm.
- 5C8.30 Policy P7 for West Norwood/Tulse Hill should also result in significant positive effects for SA Objective 8. Development should have particular regard to local views and heritage assets. The policy also seeks to support the role and contribution of West Norwood cemetery as a major historic asset and visitor attraction, while protecting and strengthening the role of the existing heritage assets. The policy also enhancements to the public realm in the West Norwood Cultural and Heritage Area and Tulse Hill.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 Policies

5C8.31 Overall, and taking into account the criteria outlined in the Sustainability Framework, it is likely that the DRLLP PSV 2020 policies should have significant positive effects on the existing baseline and in protecting, conserving and enhancing areas and buildings for their historic and/or archaeological interest and in the protection of their settings.

Table 15: Summary assessment of effects of the DRLLP PSV 2020 on built and historic environment

Assessment of effects of the DRLLP PSV on SA objective 8	Score	Justification of Score	Timescale and probability	Permanent or temporary
Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.	++	<p>The DRLLP contains sound policy to ensure Conservation Areas, statutory listed buildings and settings, non-designated heritage assets, areas of archaeological potential, valued views are protected appropriately, and protection of existing open space and provision for new open space and green infrastructure. It is therefore considered that the key sustainability issues identified in Table 4 relating to heritage and the built environment are well provided for in the DRLLP PSV.</p> <p>The DRLLP PSV also contains robust policies for the quality of the built environment including urban design of individual developments, public realm, construction detailing and protection and enhancement of amenity values.</p> <p>Overall, it is considered that the quality of built environment policies should result in significant positive effects on the built and historic environment. Policies emphasise the need for well-designed buildings with use of quality materials where local distinctiveness is sustained and reinforced. This includes both local character and reflecting the cultural diversity of the Borough through appropriate architecture. All proposals will be expected to create positive and attractive environments.</p>	The positive impact of protection, conserving and enhancing areas and buildings designated for their historic and/or archaeological interest will be achieved immediately, and continue to be over the long term for the Boroughs Conservation Areas and listed buildings and non-designated heritage assets. The positive impacts of enhancing areas and buildings will likely be achieved in the medium to long term as funding becomes available and as sensitive development in surrounding areas occurs.	Permanent and ongoing

Recommendations for monitoring likely significant effects

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

- Amount of open space lost through completed planning permissions
- Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score
- Number of heritage assets on the 'at risk' register
- Number of conservation areas with up-to-date character appraisals
- Infrastructure Delivery Plan updates
- Number of listed buildings within the borough

5C9. TRANSPORT AND TRAVEL

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

Objective 9: Integrate planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.

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

Relevant policy objectivesNational Level

5C9.3 Section 9 of the *NPPF 2019* focuses on promoting sustainable transport. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

Regional Level

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

Baseline conditions and existing issues

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

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

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

- 5C9.8 There are many bus routes with major interchanges at Waterloo, Vauxhall and Brixton. Public transport accessibility is good in north and central Lambeth. However, residents in Streatham and Norwood are without direct access to the underground and are dependent on rail and bus connections. With bus routes focussed on the main north-south radial routes into central London and a lack of east-west services, some areas of the borough continue to have low levels of accessibility compared to the rest of Lambeth.
- 5C9.9 The proportion of households with no car or van increased from 51 per cent in 2001 to 58 per cent in 2011 (Census data ONS). Traffic congestion is a serious concern for residents, with a perception that major roads can divide communities. A network of major cycle routes is in place throughout the borough and this is being expanded every year. There are also a number of off-street walking routes.
- 5C9.10 Lambeth has a low live-and-work ratio: only 28 per cent live and work in the borough. Nineteen per cent of residents commute to Westminster and seven per cent commute to the City (Destinations 2020, Mayor of London August 2010). Nearly 60 per cent of Lambeth workers travel to work by public transport, compared to just 14 per cent nationally.
- 5C9.11 The borough also benefits from river transport, both for passengers and transporting freight. There are two Thames Clipper stations in the borough.
- 5C9.12 The Lambeth Transport Strategy 2019, DRLLP PSV and Infrastructure Delivery Plan 2019 provides details of proposed transport projects that seek to improve transport in the borough. For example, northern line extensions, Vauxhall gyratory and interchange improvements, new high level stations at Brixton and Loughborough Junction and access improvements and platform lengthening at Wandsworth Road and Clapham High Street stations. Funding for some projects remains unknown/uncertain. Delivery of some transport infrastructure projects, particularly in advance of development and associated population growth, can be uncertain.
- 5C9.13 There are many busy A-roads in Lambeth including the A23 main road from London to Brighton which runs the length of the borough, the A3 which runs south from Elephant and Castle through Kennington, Stockwell and Clapham, and the A205 South Circular Road which cuts East-West across the borough. The total length of road network in Lambeth is 390.2 km (Oct 2007). Traffic congestion is a serious concern for residents, with a perception that major roads can divide communities.

Likely evolution without the revised Plan

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

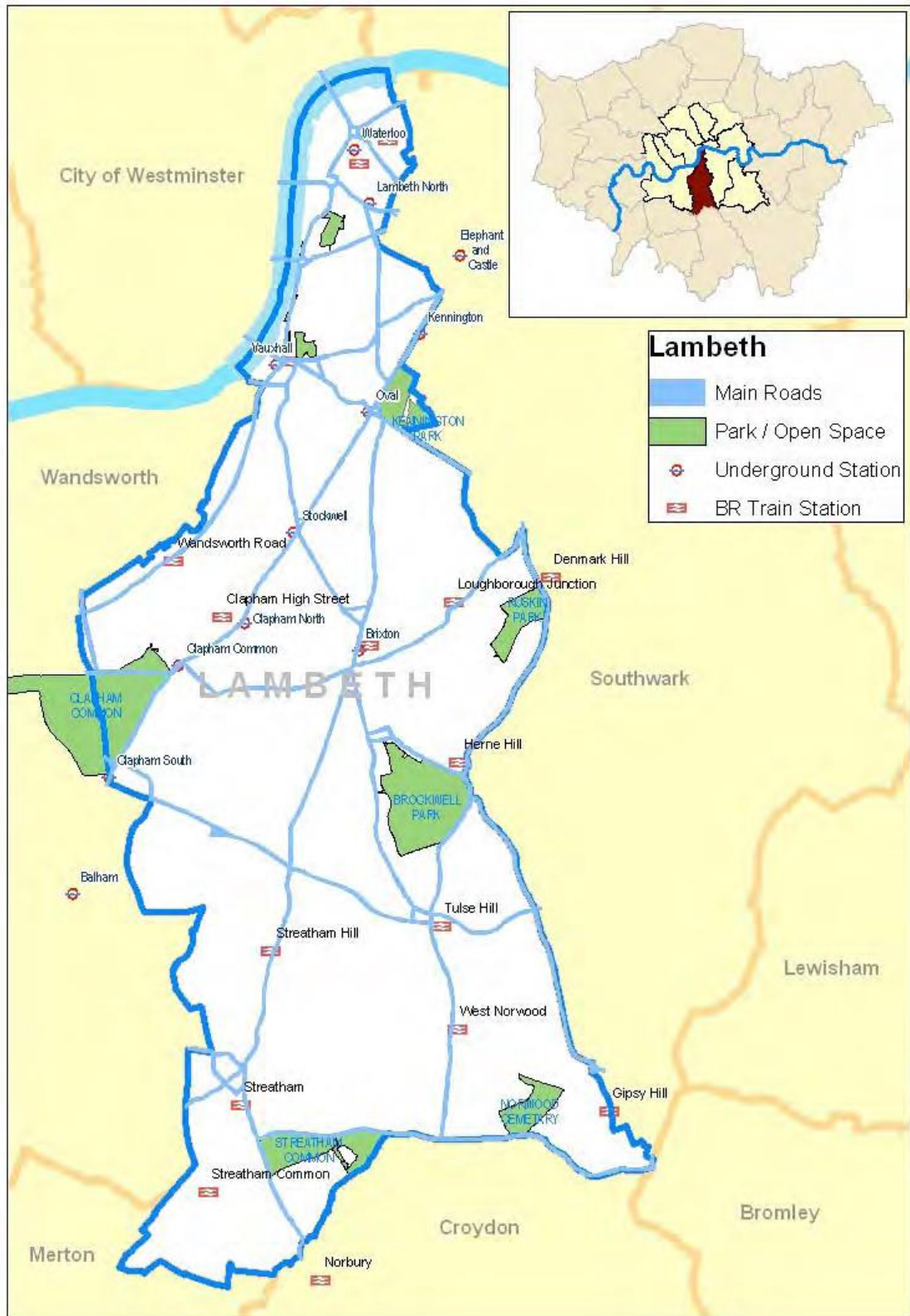


Figure 17: Main public transport provision in Lambeth (excludes new station at Nine Elms to be completed by 2020)

Assessment of revised Policies

5C9.15 This section examines the likely significant effects of implementing the proposed DRLLP PSV policies on SA Objective 9 Transport and Travel. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the proposed Plan.

5C9.16 The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	accommodation
D2 – Presumption in favour of sustainable development	S2 – New or improved social infrastructure
D3 – Infrastructure	S3 - Schools
D4 – Planning obligations	T1 – Sustainable travel
H1 – Maximising housing delivery	T2 – Walking
H7 – Student housing	T3 – Cycling
H8 – Housing to meet specific community needs	T4 – Public transport infrastructure
H9 – Hostels and houses in multiple occupation	T5 – River transport
H10 – Gypsy and Traveller Needs	T7 - Parking
H11 – Estate regeneration	T8 – Servicing
H13 – Shared living	T9 – Minicabs, taxis, private hire and ride hail services
ED1 – Offices (B1a)	EN7 – Sustainable waste management
ED3 – KIBAs	Q3 – Safety and crime prevention
ED4 – Non-designated industrial sites	Q13 – Cycle storage
ED5 – Work-live development	PN1 – Waterloo and South Bank
ED6 – Railway arches	PN2 – Vauxhall
ED7 – Town centres	PN3 – Brixton
ED8 – Evening economy and food and drink uses	PN4 – Streatham
ED11 – Local centres and dispersed local shops	PN5 – Clapham
ED12 – Markets	PN6 – Stockwell
ED13 – Visitor attractions, leisure, arts and cultural uses	PN7 – West Norwood/Tulse Hill
ED14 – Hotels and other visitor	PN8 – Kennington/Oval
	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace

Delivery and Monitoring policies D1 – D4

5C9.17 Policies D1- D4 will contribute towards the attainment of SA Objective 9 through working with a range of partners (including Transport for London and Network Rail), delivering regeneration defined in Draft London Plan Opportunity Area Planning Frameworks and local area masterplans, including infrastructure to support growth. The council will work with a range of partners and encourage dialogue between service providers and developers. Section 106 funding will provide or fund local improvements such as those to public realm, walking and cycling improvements, public transport infrastructure, highways and traffic works, car clubs, parking restrictions and travel plans which will likely result in positive effects on travel and transport in the borough. However, deliverability of major transport projects can be uncertain, for example timely delivery of Northern Line extensions (prior to occupation of new surrounding developments) has not been delivered, uncertainty on platform lengthening at Clapham High Street and Wandsworth Road stations, new stations at Brixton and Loughborough Junction and extension of the Croydon Tramlink to Crystal Palace, and it is critical that public transport capacity and infrastructure keeps pace with increased population resulting from proposed significant growth, including housing.

Housing policies H1, H7 – H11, H13

5C9.18 Policy H1 seeks to meet and exceed annual housing targets for Lambeth as set out in the Draft London Plan. Residential densities will be optimised in accordance with the design-

led approach and will have regard to site context, connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL) and the capacity and quality of provision of surrounding infrastructure. This is commendable, but public transport infrastructure, capacity and accessibility will need to keep pace with population growth and cumulative effects of developments surrounding transport hubs will need to be carefully monitored to ensure transport hubs/stations do not meet saturation point from the surrounding growth. It will be important for partners and the council to anticipate future demand and plan public transport improvements and capacities accordingly. Funding and timely delivery are areas of uncertainty.

- 5C9.19 Policy H7 provides for student housing which among other criteria, needs be located in an area with good public transport access and easy access to local shops, work places, services and community facilities. Student housing should also provide high-quality cycle parking facilities (in accordance with Local Plan policies T3 and Q13) to encourage cycling and reduce reliance on the private car. Additional text has been added to state that 'Pool bikes are particularly appropriate for student housing'. This should result in more positive effects for students, the environment and the road network in terms of attaining SA Objective 9, reducing the need to travel, reliance on the private car and prioritising walking and cycling.
- 5C9.20 Similarly, policies H8 (housing to meet specific community needs) and H9 (hostels and houses in multiple occupation) seek to provide these housing types in locations that are accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended users. These uses need be 'on a site and in a location suitable for the particular use having regard to amenity, transport and other environmental impacts'. Unlike policy H7 student housing, there is no guidance (i.e. PTAL rating) on accessibility to local services. Rather, the policy states that accessibility needs to be 'appropriate to the needs of the intended occupiers' and accordingly, each proposal will be assessed having regard to the PTAL level of the site. In terms of the intended occupiers, it is more likely that occupiers of hostels and HMOs will be more active and mobile than occupiers of nursing-care homes, disabled and learning disabled people and those with mental health issues who require additional support, meaning therefore that hostels and HMOs would likely benefit from better transport accessibility. Conversely, it is considered more likely that those in need of housing to meet specific community needs (policy H8) will more likely be 'home-bound' and more dependent on visitors for social interactions and engagements. However, it is still imperative that housing to meet specific community needs is located in areas of public transport accessibility to encourage visitors and staff to travel to these locations by means other than the private car. Policy H10 Gypsy and traveller needs makes reference to any new proposed site being close to access services and community facilities.
- 5C9.21 Changes have been made to policy H6 with regards to threshold for parking stress in residential conversions. Previous SA work on the DRLLP suggested a similar approach for parking associated with hostels and HMOs. However this recommendation is no longer considered appropriate as the threshold for parking stress has now been removed. Overall it is considered policy H9 on hostels and HMOs (particularly clause (a)(v)) supports such development that will result in positive effects on SA Objective 9.
- 5C9.22 It is considered that policies H11 estate regeneration and H13 large-scale purpose-built shared living seek to achieve positive effects for SA Objective 9. Estate regeneration schemes will need to demonstrate improved permeability, improved safety and access for walking and cycling and public transport use to local amenities and improved walking and cycling routes through the estate. Not only does this achieve positive effects in term of SA Objective 9 transport and travel, but also objectives on safety, crime and fear of crime (Objective 1), access and services (Objective 2), and liveability (Objective 7). Policy H13

supporting text states that proposals for large-scale purpose-built shared living should be located in Waterloo and Vauxhall (Opportunity Areas) due to their well-connected and serviced locations. This is considered to have positive effects on SA Objective 9.

Economic development and town centre policies ED1, ED3 – ED8, ED11 – ED14

5C9.23

Policy ED1 states that outside of specific locations (the major centres), large office development will be supported where the PTAL level is 4 or above. Proposals for smaller offices will be supported in all locations, subject to other plan policies, including transport. This policy on offices, together with policies ED3 (KIBAs) and ED4 (Non-designated industrial sites) maintain a stock of employment generating land in the borough, therefore providing opportunity for some residents to reduce their need to travel outside of the borough for work. Intensification of industrial sites will need to consider operational requirements (including servicing) and mitigate impacts on the transport network where necessary. Policy ED5 on work-live development provides opportunity for a reduced need to travel by allowing a work element together with residential use, thus contributing to a reduction in traffic and a positive effect on SA Objective 9. Policy ED6 ensures that railway arches are not used for parking, while policy ED7 on town centres provides provision for residential use above ground floor and on other appropriate sites, thereby reducing demand on public transport infrastructure for those residents in accessing daily goods, services, facilities. Policy ED7 also supports the vitality and viability of a mix of town centre uses, increasing the likelihood that more residents have access to their everyday needs within the borough, and therefore reducing the need to travel outside the borough and reducing demand on the transport infrastructure. Promoting local economies in town centres supports a ‘star and cluster’ development approach (rather than traditional ‘centre and spoke’ form of linear development), that helps reduce the need for people to travel. Proposals for drive-through takeaways will not be permitted in any location (policy ED8), thus contributing to a reduced trip generation, and improved air quality. Evening and food and drink uses will not be supported where they result in unacceptable harm to neighbouring residential and sensitive uses as a result of impact of delivery vehicles/services and traffic generation and impact on traffic flow and road safety (among other things).

5C9.24

Like policy ED7, policy ED11 seeks to protect the role of local centres and local shops in meeting the day-to-day needs of communities. These local centres and dispersed local shops provide good accessibility (either by walking or cycling) to residents for their daily needs and therefore are consistent with the aim of SA Objective 9, reducing reliance on the private car whilst prioritising walking and cycling, and reducing the need to travel.

5C9.XX

Visitor attractions, leisure, arts and cultural uses are supported in specific locations in the borough (generally those subject to good public transport accessibility and/or proximity to major centres), and any such proposals require a visitor management plan on how the potential impacts of high volumes of visitors will be managed. SA recommendation 56 on the DRLLP relating the visitor management plans and demand on local transport facilities, has been accepted and incorporated in the DRLLP PSV 2020. Supporting text paragraph 6.90 now states that visitor management plans for leisure, recreation, arts and cultural facilities should address how impacts of high volumes of visitors will be managed including implications for public services, including local transport services. This recognises visitor attractions attract higher footfalls at specific times (e.g. Oval cricket match days, theatres), therefore generating intensified effects on transport infrastructure and the surrounding area for that period of time as compared to visitor accommodation, where people come and go at their leisure. (A visitor management plan is also required for new or extended visitor accommodation relating to hotels and other visitor accommodation (ED14).) Furthermore, to bring policy ED13 more in line with the requirements under policy ED14, planning obligations will be sought to address any additional public service provision and maintenance, including local transport services. This is in addition to existing text which

seeks planning obligations for public realm improvements, especially on routes to and from public transport nodes. This allows for the provision of improved transport facilities to benefit users, prioritises walking, cycling and use of public transport and integrates new development with sustainable transport choices.

Social infrastructure policies S2, S3

5C9.25 Policy S2 on new or improved social infrastructure states that ‘the site or buildings are appropriate for their intended use and *accessible* to the community’ and the supporting text clarifies that new community premises should be conveniently located and easily reached on foot, by bicycle or public transport and be fully accessible to all sections of the community (including people with disabilities and older people). Clause (a)(ii) seeks to minimise traffic generation, congestion, parking and negative impacts in road safety. The supporting text states that places of worship are encouraged in areas of high public transport accessibility, such as town centres, given their potential impact on highways. Developments of more than 500 residential units should incorporate childcare provision to meet additional need where this need cannot be met by existing facilities. Similarly, proposals of more than 25 residential units should include appropriate provision of social infrastructure to meet additional need where this need cannot be met through existing facilities. If these are not possible, payment in lieu will be sought. These clauses seek to ensure necessary social infrastructure is accessible, easily reached by foot or bicycle. This approach seeks to reduce the need for private vehicle transport and integrate new development with sustainable transport choices, which is consistent with achieving SA Objective 9.

5C9.26 Policy S3 clause (e) states proposals should support sustainable travel, including the need for school travel plans and appropriate road danger reduction measures. This is considered to have positive effects on SA Objective 9 as well as SA Objective 1.

Transport policies T1 – T5 and T7 – T10

5C9.27 Overall it is considered that all transport policies (T1 – T5 and T7 – T9) will likely result in significant positive effects on SA Objective 9, particularly policy T1 which makes clear the council will promote a sustainable pattern of development in the borough, minimising the need to travel, maximising trips made by sustainable modes and reducing dependence on the private car. Policy T1 makes clear that development should contribute toward the improvement of access to public transport and the improvement and delivery of strategic walking and cycling routes that serve the site. SA recommendation 57 on the DRLLP has been incorporated into the DRLLP PSV 2020. Policy T1(e) has been amended to make clear that the improvement of inclusive access to public transport and the improvement and delivery of walking and cycling routes that serve to site can be achieved through the design itself, and/or through financial obligations, appropriate to the scale and impact of the development. This amendment is commended and results in positive effects on SA Objective 9.

5C9.28 Clause (f) of policy T1 states that the council will apply Draft London Plan policy T4 to the assessment and mitigation of transport impacts, including requirements for travel plans to promote sustainable travel and minimise the number of trips by car. The SA on the DRLLP recommended the policy team revisit this clause to note the benefit in travel plans also addressing 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 (SA recommendation 58). No change was made as a result of this recommendation as it was considered that this is not a function of travel plans and this information should already be included in Transport Assessments. DfT and TfL guidance provide full details of the required content of a TA which includes accident analysis and road safety issues. The response is noted and considered appropriate to address the

recommendation on the DRLLP.

- 5C9.29 Policies T2 and T3 seek to improve conditions for active travel (walking and cycling). Policy T3 provides good provision for changing facilities and associated amenities for cyclists of employment and education facilities. SA recommendation 59 on the DRLLP was similar to recommendation 57 made above with respect to policy T1, and while commendable, it was considered unrealistic for all development proposals to meet clause (g) of policy T3. It was suggested that perhaps clarification is needed that it applies to major developments only, or new text be added to the effect that such improvements are relative/proportionate to the scale of development. No change was made as a result of the recommendation as the policy team considered 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. The response is noted and considered sufficient to respond to the recommendation on the DRLLP. It also positively supports SA Objective 9 in prioritising cycling. Policy T3(d) has also been further strengthened, by stating Lambeth will promote cycling by reducing motor traffic with regards to cycling routes. It is considered this seeks to achieve positive effects on SA Objective 9, including its prompt questions.
- 5C9.30 SA recommendation 60 on the DRLLP has been incorporated in the DRLLP PSV 2020. Policy T4 clause (a) has been amended to include the words 'where appropriate' at the end of the introductory sentence to provide greater clarification. SA recommendation 60 on the DRLLP also suggested that the policy team may wish to revisit clause (e) as it was deemed to realistically only apply to major developments. Policy T4 clause (e) has been amended in the DRLLP PSV 2020 to state 'where appropriate, development proposals should improve accessibility to public transport...'. Both of these amendments are considered appropriate to address the recommendation made on the DRLLP and positively contribute towards SA Objective 9. Clause (f) has been strengthened so that proposals to improve or provide new public transport infrastructure, also include adequate cycle parking and ease of access on foot, including consideration of pedestrian desire lines. It is considered this amendment to policy ensures various transport options are better integrated at transport hubs, thereby making cycling and walking for even part of a journey, more attractive.
- 5C9.31 Policy T5 provides for river transport and policy T7 is on parking, whereby the council will apply Draft London Plan parking policy T6 to promote a reduction in car ownership and private car trips. For residential schemes, the policy promotes less car parking for sites in areas of PTAL 2 and 1 than what the Draft London Plan allows. A lower car parking allowance seeks to encourage residents to reduce reliance on the private car and thus, the overall level of road traffic whilst prioritising walking, cycling and use of public transport. This positively contributes towards SA Objective 9. Policies T8 and T9 are considered to have positive effects on SA Objective 9 by ensuring adequate provision is made for servicing including acceptability in terms of impact on road and traffic conditions, and minicab, private hire vehicle offices and taxi ranks demonstrate that their operation would not adversely impact on traffic congestion or pedestrian movement. Policy T8 helps support the Lambeth Transport Strategy in relation to freight and servicing. Policy T10 also supports SA Objective 9 through the ability to work remotely and thereby reduce need to travel.
- 5C9.32 Overall it is considered that the transport policies should achieve significant positive effects with respect to SA objective 9.
- Environment policy EN7**
- 5C9.33 Waste management does not necessarily reduce travel as waste vehicles are needed to collect and dispose of borough waste. However, proposals for new and improved waste

facilities will be assessed against Draft London Plan policy S18 and national waste planning policy which includes transport and environmental impacts of all vehicle movements related to the proposal (and local plan policy T8 on servicing will also apply for waste vehicles).

Quality of the Built Environment policies Q3, Q13

- 5C9.34 It is considered that policy Q3 on safety, crime prevention and counter terrorism will positively contribute toward achieving SA Objective 9 as it seeks to create a safe borough for all by creating positive and attractive environments. This will encourage walking and cycling in the borough, thus reducing reliance on the private car and the overall level of road traffic as users feel safe in their active transport environment. Similarly, policy Q13 cycle storage seeks accessible, attractive, secure and safe cycle storage conveniently accessed to allow for different user needs and different types of cycles. The provision of cycle storage in developments, including conversions, positively contributes to SA Objective 9 by encouraging cycling through the provision of high quality storage facilities in accordance with Draft London Plan minimum standards, or exceeded in areas of high cycle demand, to help reduce reliance on the private car.

Places and neighbourhoods policies

- 5C9.34 Policy PN1 on Waterloo maximises its strategic location and high public transport accessibility by providing for a range of uses including tourist / leisure / entertainment, offices, healthcare, housing, services and shopping. The policy also supports reducing traffic and supporting better conditions for walking and cycling throughout Waterloo alongside improvements in capacity, accessibility and interchange quality at Waterloo station. Improvements in capacity will be necessary with projected population growth. Funding to reconfigure Waterloo City Hub and Water Road junction to allow for new open space, new bus station, new direct links from Station to South Bank and upgrades to adjoining streets – considered critical to develop Waterloo as a Business District and overcome historic issues of severance and poor public realm – has been secured and the project should be implemented by 2023/24. Traffic management measures to deter unnecessary car trips and innovative measures to reduce the impact of freight and construction traffic will be promoted, including increased use of the River Thames. Overall it is considered that policy PN1 will result in positive effects on SA Objective 9.
- 5C9.35 Similarly, policy PN2 for Vauxhall maximises the potential of its location by supporting a range of mixed uses including retail, employment, housing, leisure, entertainment and other creative, cultural and community uses that will enable reduced need to travel. Additionally, the policy seeks to improve the transport experience by reducing the dominance of road traffic, increasing capacity of public transport infrastructure and maximising opportunities to walk and cycle safely and comfortably. It is proposed that the bus station will be remodelled and the gyratory will be removed, thereby improving public realm, connectivity and more simplified road junctions and crossings for walkers, cyclists, public transport users and motorists alike. Overall, it is considered that policy PN2 has potential for significant positive effects on SA Objective 9. However, delivery of necessary transport infrastructure *ahead* of projected growth in this area is uncertain/unlikely; funding for complementary related improvements to the adjacent area of the Vauxhall gyratory works to improve access, public realm and environmental quality is not secured.
- 5C9.36 Brixton policy PN3 also seeks to capitalise on its transport infrastructure and major town centre status by providing for mixed use development. The policy also seeks improvements in provision for pedestrian movement and cyclists; improved linkages within the town centre and connections with adjoining areas and traffic reduction and initiatives to reduce harmful emissions. Clause (g) seeks further improvements in the quality and connectivity of public transport such as a fully accessible refurbished mainline train station, working with TfL to open a rear entrance to Brixton Underground station on Electric Lane;

delivering a cycle parking hub near the tube station, and exploring opportunities to improve access to east to west rail links. Clause (n) sets out detail on redeveloping the land that includes the mainline train station. The policy promotes sustainable forms of travel and aims to reduce the need to travel by local people. However an opportunity to maximise positive effects on SA Objective 9 may be lost/delayed if funding cannot be secured for the Brixton Rail Station upgrade.

- 5C9.37 Sustainable travel, accessibility and use of public transport, walking and cycling are all supported in Streatham through improvements to the safety and accessibility of public realm and public transport facilities and measures to reduce the impact and dominance of road traffic and improve air quality. As a major centre, Streatham also capitalises on its function as a town centre by encouraging mixed use developments. However, there is a funding gap for the Streatham High Road Phases 5&6 project - delivery of public realm, walking and cycling improvements between Sternhold Avenue and South Circular. Funding has been secured to improve Streatham station access – a station which has experienced significant passenger growth over the last 10 years.
- 5C9.38 Policy PN5 for Clapham supports enhancements to the public realm of the town centre to increase green infrastructure and improve the safety, accessibility and environment for pedestrians and cyclists. This should encourage more active travel and greater efficiency of the transport network on improve linkages though the town centre, across the high street and between the town centre and Clapham Common MOL. SA recommendation 10 on the DRLLP has been incorporated into the DRLLP PSV 2020 by having a reference to safety of Cycleway 7 in clause (g). SA recommendation 61 on the DRLLP has also been incorporated in the DRLLP PSV 2020 and the Clapham policy now specifies support to lengthen the platforms at Wandsworth Road and Clapham High Street (to accommodate longer trains) alongside other aspirations for transport infrastructure improvement. This is considered to appropriately address the SA recommendation and positively contribute to SA Objective 9.
- 5C9.39 Policy PN6 for Stockwell seeks to develop and enhance its sense of place by introducing measures that will reduce severance caused by Clapham Road, reduce road danger and improve environmental and accessibility conditions for pedestrians and cyclists. It also seeks to work with TfL to implement the council's Healthy Route Network, including upgrading Cycleway 7. West Norwood/Tulse Hill policy PN7 supports its role as a vibrant district centre offering a range of uses, including protection of Lambeth's largest industrial area (KIBA), thereby reducing need to travel for some local residents. Public realm improvements around transport nodes are also supported and 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 reliability and frequency of rail services across the area. Policy PN8 for Kennington and Oval seeks 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. SA recommendation 62 on the DRLLP suggested that 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. No change was made as a result of this recommendation as it was considered that this is adequately addressed through PN8(h). Furthermore, it is noted that reference to the implementation of council's Healthy Route Network has been added, although it is also noted that the IDP identifies a funding gap of £27.5 million for this project (that could partly be met by CIL/S106). Nonetheless the policy response is noted and is considered to adequately address the previous DRLLP SA recommendation, thus providing positive effects on SA Objective 9.

- 5C9.40 Herne Hill policy PN9 supports further improvements to the quality, safety and accessibility of the public realm, convenient linkage between the station and adjoining areas, improvements to the station and improving walking and cycling links to the area. Policy PN10 on Loughborough Junction has a significant focus on working with local groups to improve transport infrastructure, prioritising walking, cycling and the use of public transport over car use, and seek improvements to the station, including step-free access. The policy also supports proposals that increase the permeability, accessibility, navigability and safety of the area through improvements to existing walking and cycling routes. The policy aims to reduce the number of people driving through the Loughborough Junction area. It is considered the policy seeks to maximise positive effects on SA Objective 9.
- 5C9.41 The policy for Upper Norwood supports the extension of the Tramlink to Crystal Palace and/or improvements to rail frequencies on the Beckenham Junction corridor, and work with TfL on options to improve bus services towards central London improvements to the bus station, along with ways in which traffic conditions in the area can be improved.
- 5C9.42 On balance, it is considered the places and neighbourhoods policies seek to improve road and environmental conditions for pedestrians and cyclists, reduce road danger, linkages between stations and adjoining areas, work with partners to deliver transport projects and maximise public transport use and accessibility by encouraging mixed use developments in town centres. It is considered that the places and neighbourhoods policies effectively contribute to attaining SA Objective 9, however it is noted that some transport infrastructure projects have identified funding gaps in the IDP which brings into question the deliverability of such project.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

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

Table 16: Summary assessment of effects of the DRLLP PSV 2020 on transport

Assessment of effects of the DRLLP PSV 2020 on SA objective 9	Score	Justification of Score	Timescale and probability	Permanent or temporary
Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++/?	<p>On the whole it is considered that the DRLLP PSV 2020 has been produced with the premise of sustainable patterns of urban development actively borne in mind. Growth areas earmarked for future comprehensive redevelopment are in locations that have potential to facilitate efficient accessibility to both areas within and outside of the borough. The DRLLP PSV 2020 seeks to maintain a stock of land for commercial and industrial purposes, providing improved access to jobs for some people. Similarly, appropriate town centres are allocated for higher levels of growth in mixed developments, making use of current (and future) accessible transport networks. Policies effectively seek to address key transport issues in Lambeth. Many policies seeks or support public transport infrastructure improvements, including better walking and cycling environments.</p> <p>However, while the DRLLP PSV 2020 in theory makes provision for reduced need to travel through more sustainable patterns of urban development and policies to improve public transport and increase walking and cycling journeys; the difficulty and uncertainty lies in the timely delivery of necessary improved public transport infrastructure and capacity, and public realm improvements to facilitate active travel and use of public transport through identified and committed funding</p>	<p>Comprehensive achievement of this objective will more likely be evident in the longer term as larger scale transport developments are completed or funding is secured, for example Brixton Station improvements, platform lengthening at Clapham High Street and Wandsworth Road stations, Overground stations at Brixton and the Healthy Route Network.</p> <p>Positive effects from more local measures or where funding is secured are more likely to be evident in the short to medium term, for example Vauxhall and Tulse Hill gyratory removal, local level walking, cycling, public realm improvements.</p> <p>The DRLLP SPV 2020 is reliant on the delivery of improved public transport infrastructure and that infrastructure keeping pace with population growth and demand. The extension of the northern line to Nine Elms will be delivered by 2020, however developments have and are already being completed in the area, meaning that delivery of the infrastructure lagged behind occupation of developments, resulting in short-term adverse effects for occupiers and local</p>	<p>Temporary effects associated with construction of new northern line extension and other infrastructure and capacity improvements; however it is considered that these temporary effects can be managed/mitigated on-site to some extent, and through agreement on working hours and days.</p> <p>Once the extension of the northern line is in place and operating, the significant positive effects for Vauxhall area in particular will be permanent but it is recognised that capacity levels will need to be regularly reviewed and improved thereafter as necessary. Similarly, once public transport improvement projects are delivered, positive effects are likely to be permanent but</p>

		<p>sources (for example a new station at Brixton for London Overground line, Brixton Rail Station upgrade, improved walking, cycling and public realm benefits in Brixton – particularly to facilitate cycling, implementation of Healthy Routes Network project (all of which have significant funding gaps), Waterloo Public Realm Project, the timely delivery of the northern line extension to Nine Elms (completion expected 2020 which is after occupation of much new development in the surrounding area)). There are also significant funding gaps for the road danger reduction project, which is a key barrier to the uptake of walking and cycling; a barrier also to effectively achieving sustainable growth.</p>	<p>people. Stage 2 of the northern line extension requires increased capacity of trains. To maximise sustainability outcomes and enable sustainable lifestyles and achievement of SA Objective 9, transport infrastructure needs to keep pace and ahead of growth before occupation areas.</p> <p>Currently there is no commitment to the necessary funding for a new station at Brixton and Loughborough Junction for the London Overground. Similarly there is no funding currently in place for refurbishments to provide step-free access and safer and improved user experience at Brixton Rail Station. It is uncertain if or when these will be delivered. Until such time, negative effects will continue for affected groups (particularly people with disabilities, mobility issues, older and younger persons, pregnant women).</p> <p>The Infrastructure Delivery Plan 2019 sets out expected timescales for infrastructure delivery.</p>	<p>in need of review to ensure capacity remains appropriate.</p>
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Recommendations for monitoring likely significant and uncertain effects

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

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

5C10. BIODIVERSITY

5C10.1 This section of the SA relates to the sustainability performance of the Revised Lambeth Local Plan Proposed Submission Version against:

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

5C10.2 To achieve this objective, plan policies should protect and enhance habitats and species and provide for the long-term management of natural habitats and wildlife; improve the quality and extent of designated and non-designated sites; protect and enhance access to open space and improve the quality of publicly accessible green space; increase and enhance the resilience of Lambeth's key priority habitats and species in line with its Biodiversity Action Plan's long term vision and objectives; encourage replacement of valuable lost habitat; bring nature closer to people, i.e. help conserve local nature conservation amenity, including gardens; provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats); improve access to areas of biodiversity interest; enhance the ecological function and carrying capacity of the green space network; and promote a network of green infrastructure.

Relevant policy objectivesInternational Level

5C10.3 The *Directive 92/43/EEC* on the Conservation of Natural Habitats and Wild Flora and Fauna – the 'Habitats Directive' provides legal protection for habitats and species of European importance. It requires the maintenance or restoration of habitats and species of interest to the EU in a favourable condition.

National Level

5C10.4 Section 15 of the *National Planning Policy Framework 2019* relate to conserving and enhancing the natural environment. The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological conservation values and soils; recognising the wider benefits from natural capital and ecosystem services; minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Regional Level

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

Local Level

5C10.6 The Lambeth Biodiversity Action Plan 2019-2024, or 'Lambeth BAP', is a document designed to help provide the information to protect Lambeth's wildlife and biodiversity. It provides information in a way which is accessible to all, regardless of background, previous knowledge or interest, so that novice and expert alike can understand what is required and what can be done to protect what we have and

make it even better for future generations. The Lambeth BAP will encourage all those living and working in Lambeth with a responsibility for, or an interest in, the protection of wildlife and biodiversity to work together to continue doing, or improving on, what's working well, and avoid taking action or making decisions that might harm or impact upon Lambeth's wildlife status or biodiversity value. It also contains seven habitat action plans: built environment; parks and open spaces; private gardens and growing spaces; railway linesides; rivers and standing water; tidal Thames; and woodlands and trees. Each habitat action plan identifies a diversity of priority species for that habitat.

- 5C10.7 There are 49 designated Sites of Importance for nature Conservation (SINCS), including two Metropolitan, 24 Borough and 21 Local Grade sites. 96 per cent of the borough's SINCS are or have been in positive conservation management in the five years prior to 2019. 13.8 hectares of Streatham Common was designated as a Local Nature Reserve in January 2013 with another site Unigate Wood proposed for 2020 and two other candidate sites, Eardley Road Sidings and Palace Road Nature Garden, being declared in 2022.

Baseline conditions and existing issues

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

Likely evolution without the revised Plan

- 5C10.9 Without the Revised Lambeth Local Plan Proposed Submission Version, the Lambeth Local Plan 2015 will be out-of-date by 2020 and the council would need to rely on the provisions of the London Plan and the Lambeth Biodiversity Action Plan. The Revised Lambeth Local Plan Proposed Submission Version includes review of SINCS and the findings of this review would not be reflected in the development plan for the borough. There may be a greater risk that increased population and economic activity will place an increased demand on water, biodiversity and open space and without the Revised Lambeth Local Plan Proposed Submission Version development may occur in areas that may disproportionately exacerbate issues for biodiversity. Developers will still need to comply with legislation protecting biodiversity, for example Wildlife and Countryside Act.

Assessment of revised Policies

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

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

D1 – Delivery and monitoring

D2 – Presumption in favour of sustainable development

D3 – Infrastructure

D4 – Planning obligations

D5 – Enforcement

H1 – Maximising housing growth	Q11 – Building alternations and extensions
H5 – Housing standards	Q14 – Development in gardens and amenity spaces
T2 – Walking	Q15 – Boundary treatments
T3 – Cycling	PN1 – Waterloo and South Bank
T5 – River transport	PN2 – Vauxhall
ED8 – Evening economy and food and drink uses	PN3 – Brixton
EN1 – Open space, green infrastructure and biodiversity	PN4 – Streatham
EN2 – Local food growing and production	PN5 – Clapham
EN4 – Sustainable design and construction	PN6 – Stockwell
EN6 – Sustainable drainage systems and water management	PN7 – West Norwood/Tulse Hill
Q9 – Landscaping	PN8 – Kennington/Oval
Q10 - Trees	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace

Delivery and Monitoring policies D1 – D5

5C10.12 In terms of biodiversity impacts, policy D1 that seeks to optimise use of previously developed land and vacant buildings, including vacant historic buildings (commensurate with their conservation), may result in adverse effects on local species such as bats (which roost in buildings and roofs) or black redstarts or reptiles (which make use of brownfield environments). However, such species are protected by law, and ecological surveys required as part of planning applications should avoid adverse impacts on such species and habitats, using measures such as brown roofs to replicate brownfield environments. Growth, and physical infrastructure required to support such growth, can result in significant adverse effects upon local biodiversity unless appropriate avoidance and mitigation measures are implemented. Provision of green infrastructure may help to mitigate impacts on biodiversity. The Local Plan also contains policies to protect biodiversity, and conditions are normally attached to planning permissions to further protect and enhance biodiversity. Policy D4 on planning obligations also seeks to ensure that development proposals provide or fund local improvements to mitigate the impact of development. A list of improvements is provided and, 'mitigation of impacts on and/or enhancements of biodiversity and wildlife habitats' is included within policy D4.

5C10.13 As highlighted previously (in the appraisal against SA Objective 7) there is some concern, particularly regarding cumulative impacts on biodiversity with the policy approach of policy D5 Enforcement.

Housing policy H1, H5

5C10.14 The significant number of new dwellings proposed for the borough may have some potential to adversely impact on biodiversity and open spaces, however overall it is considered the DRLLP PSV contains robust policies on the protection of, and mitigation of impacts on, biodiversity and open space. Policy H1 supports delivery of new homes on small sites, as well as all suitable and available brownfield sites. However, other policies (for example EN1, Q9, Q14) actively seek to protect biodiversity and designated open spaces and create new open space in areas that are deficient in open space. It is estimated that about 20% of Lambeth is covered in private gardens (Lambeth BAP 2019). Policy H5 and other design policies (such as Q14) seek to retain a minimum garden coverage (houses, ground-floor flats and family-sized units should preferably have direct access to a private garden) and communal amenity space provided should incorporate sustainable landscape principles and practices, including promotion of biodiversity.

Economic Development policy ED8

5C10.15 Positively, evening economy and food and drink uses policy ED8 recognises that

this land use may have potential for adverse effects on biodiversity. It states that proposals for evening and food and drink uses should be accompanied by a management plan and a customer management plan, including mitigation measures for any negative impacts of these uses. Impacts such as noise and light pollution on local wildlife and biodiversity should be considered through appropriate location, design and scheduling to address the requirements of Draft London Plan policy G6 Biodiversity and access to nature. Accordingly it is considered that any potential negative effects on biodiversity will be avoided or appropriately mitigated through the planning process.

Transport policies T2, T3, T5

- 5C10.15 Policy T5 seeks to protect biodiversity of the River Thames where there are proposals for new piers or improvements to existing piers. Other transport policies, such as T2 and T3 on walking and cycling seek to create environments conducive for increased active travel. A common way to achieve this is through the provision of 'green corridors' or 'greenways' – effectively greening streets and routes to make them more enjoyable to use for active travel. A secondary effect of this is that such green infrastructure also provides corridors for species to use and migrate along, and thus offers biodiversity benefits. Therefore it is considered that these policies will positively contribute to SA Objective 10.

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

- 5C10.16 Open space is defined in supporting text paragraph 9.5 and it includes protecting and maintaining a wide range of parks and open spaces, including district and local parks, nature conservation areas and communal squares and gardens. SA recommendation 63 on the DRLLP has been accepted and incorporated in the DRLLP PSV 2020. Paragraph 9.5 has been amended to include reference to biodiversity, stating that 'Public and private open space is protected for its value in providing space for leisure, recreation and sport, health and wellbeing, air quality, *habitats and species*, and for its contribution to visual amenity and *ecological function*. This amendment provides more appropriate supporting text to policy EN1 and ensures that open space, both public and private, is protected, enhanced and promoted for its biodiversity. Green infrastructure can include green spaces, street trees and green roofs, all of which are recognised for enhancing biodiversity and providing more attractive places for people, and urban greening is recognised for its effect on enhancing biodiversity habitats. Overall it is considered that policy EN1 will result in positive effects on the achievement of SA Objective 10, particularly clauses (b) and (c) provided clause (c) is actively implemented at the planning application stage for all development proposals. Application of the urban greening factor in major developments should also help to significantly increase the amount of greenery provided in development proposals. Again, the degree and extent of positive effects on local biodiversity and ecological networks relies on the rigour on which the policy is implemented at planning application stage.
- 5C10.17 Policy EN2 on local food growing and production supports local biodiversity and provides the opportunity to bring nature closer to people, therefore considered positive in achieving SA Objective 10. As mentioned above with regards to policy D1, use of vacant or derelict land or buildings for food growing will need to be mindful of species on site, for example bats in roof crevasses, and reptiles or stag beetles on vacant land or in derelict buildings (in line with EU legislation).
- 5C10.18 Policy EN4 states all development is required to meet high standards of sustainable design and construction feasible. Non-residential developments should achieve BREEAM rating of 'excellent' and BREEAM includes credits for biodiversity enhancements. Development is also required to be resilient to climate change, which

includes provision of green infrastructure (such as living roofs and walls) and makes a contribution to enhancing and promoting biodiversity in the borough and bringing nature closer to people, thus positively achieving SA Objective 10.

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

Quality of built environment policies Q9 - Q11, Q14 - Q15

5C10.20 Overall it is considered that positive effects on biodiversity should result from policy Q9 on landscaping. As previously mentioned, the degree and extent of positive effects on local biodiversity will depend on the rigour on which the policy is implemented at planning application stage and delivery. Positively all SA recommendations made on the DRLLP to improve outcomes for biodiversity have been accepted and incorporated into the DRLLP PSV. SA recommendation 64 has resulted in an amendment to para 10.34 that strengthens supporting text in relation to expectations on biodiversity enhancement under policy Q9. SA recommendation 65 has resulted in the policy being strengthened to refer to priority habitats (rather than designated habitats) and this amendment brings the policy into line with the recently adopted Lambeth Biodiversity Action Plan. And SA recommendation 66 has meant that all planning applications should be supported by a landscape design scheme (rather than just residential developments including those that form a mixed use scheme). These changes to policy Q9 will result in positive effects on SA Objective 10.

5C10.23 Policy Q10 on trees contributes to the achievement of SA objective 10. Policy Q11 on building alterations and extensions further supports policy EN1 by stating that the use of living (green) roofs will be strongly encouraged for flat roofs which are not used as amenity space.

5C10.24 Policy Q13 (b) (iii) states that in considering small-scale flat conversions and intensification of use the council will support cycle storage in front gardens/forecourts only where it does not compromise visual amenity or access. The Lambeth Biodiversity Action Plan (BAP) identifies gardens as a priority habitat for the borough and does not differentiate between, rear, front, side or corner gardens. The London BAP also identifies private gardens as priority biodiversity habitat. Gardens are also identified as open space under policy EN1. As such, SA recommendation 67 on the DRLLP suggested that 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 was further considered that this better aligns with policy Q14 – development in gardens which takes account of biodiversity values and the policy team may wish to revisit this policy aspect (SA recommendation 67). No change was made as a result of this recommendation as 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-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. The response is noted and is considered to adequately address SA recommendation 67 on the DRLLP.

5C10.25 Overall it is considered that policy Q14 on development in gardens and on land most recently used as gardens should result in positive effects on SA Objective 10. SA recommendation 68 on the DRLLP was accepted and has been incorporated in the

DRLLP PSV. Policy Q14(b)(i) has been amended as follows: 'there would be no harm to the visual amenity or biodiversity value'. This amendment recognises that gardens (regardless of location - front, rear, corner or side) are priority habitats under the borough and London Biodiversity Action Plans. Supporting text states that 'proposals should retain / incorporate as much soft landscaping (including trees) as possible for visual amenity and biodiversity. Landscape design should optimise the opportunities to improve air quality and support wildlife habitats for birds, insects, reptiles and mammals such as hedgehogs'. In response to SA recommendation 19 'trees of value' has been defined. Overall it is considered that policy Q14 positively contributes to SA Objective 10.

Places and Neighbourhoods policies PN1 – PN11

5C10.26 Overall it is considered that the places and neighbourhood policies should not result in significant adverse impacts on biodiversity. The policies generally seek to intensify land use in established town centres through mixed use development schemes while also providing public realm improvements. All the major centres (Waterloo and South Bank, Vauxhall, Brixton and Streatham) seek to improve the quality of publicly accessible green spaces, increase green infrastructure and connect and improve existing green spaces where possible. Given that most centres will be seeing significant regeneration/rebuilding, it may be appropriate for these policies to promote living roofs and walls. This will not only bring biodiversity benefits, but also improve local air quality and the overall greening of the place. As most of the town centre policies seek to promote sustainable transport, public realm improvements, air quality improvements and reduce impact of road traffic; it is considered appropriate to further encourage living walls and roofs in town centre developments, particularly the major centres. It is recognised that policy EN1 makes provision for living roofs and this policy will apply to all proposals within the places and neighbourhoods boundaries.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

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

Table 17: Summary assessment of effects of the DRLLP PSV 2020 on biodiversity

Assessment of effects of the DRLLP PSV 2020 on SA objective 10	Score	Justification of Score	Timescale and probability	Permanent or temporary
To protect and enhance biodiversity and to bring nature closer to people	++/?	<p>Taking into account existing baseline conditions of biodiversity, it is considered that the DRLLP PSV 2020 generally provides well for SA objective 10 and significant positive effects are anticipated, provided policies are fully implemented at decision-making of applications.</p> <p>Application of the urban greening factor is anticipated to result in significant positive effects on biodiversity. Policy EN1 ensures no harm to biodiversity value of open spaces regardless of whether they are designated or not. There is also a much more prevalent political and social push towards improving air quality, and provision of green infrastructure is one good way of achieving this – a positive impact also for biodiversity. Accordingly there is potential for positive cumulative and synergistic effects on biodiversity in the predominately urban existing environment, as policies EN1, Q9, Q14, places and neighbourhoods policies (for example Vauxhall) promote creation of new habitats and creating better connections between spaces. These policies have also been strengthened in the DRLLP PSV as a result of SA recommendations. Policy ED8 also now makes a positive contribution to the protection of biodiversity with regards to evening and food and drink uses. Overall, it is considered that the DRLLP PSV provides the appropriate policy context for protecting and enhancing biodiversity and bringing nature closer to people.</p> <p>The uncertainty lies in the delivery of the biodiversity-related policies and the extent and degree of rigour on which they are applied, taking into account all facets of planning policy that are weighed and considered in making decisions on planning applications. It will also be important that biodiversity and provision of green infrastructure is considered very early in the design process – i.e. at pre-application stage. It is also recognised</p>	<p>The open space network is already protected, so this is already evident and will remain evident for the entire plan period.</p> <p>Biodiversity enhancement can be evident in the short term as some development occurs. Increased improvements and restoration are likely in the short-medium term.</p> <p>New areas of useable open space might be evident in the medium to long terms as developments and public realm projects are completed but it is recognised that finding land for new provision of open spaces, particular large open spaces is unlikely. Provision of green infrastructure is increasingly important for biodiversity.</p> <p>Construction effects may temporarily affect biodiversity in some locations (for example reuse of vacant buildings, development of brownfield sites); however the law requires developers not to intentionally injure, capture or kill protected species such as bats or damage or destroy habitat such as bat roosts. It is considered that ecological surveys and advice from qualified ecologist can avoid or mitigate adverse effects on protected species / habitat. Any loss of brownfield habitat can be recreated in the new development (for example</p>	<p>Permanent</p> <p>Any effects associated with construction are likely to be minimised through mitigation measures and are likely to be temporary in nature.</p>

		<p>that often proposals are not built out to how they were designed.</p> <p>The Habitat Regulations Assessment (HRA) – Screening Report concluded that the DRLLP PSV will not result in any likely significant adverse effects on any European Site. Similarly, it found the DRLLP PSV will not have an adverse impact on the integrity of the four Natura 2000 sites. Therefore, the Appropriate Assessment stage is not required on the DRLLP PSV for Lambeth Borough. The HRA screening report was subject to consultation alongside the SA (including Natural England) and the Draft Revised Lambeth Local Plan October 2018 and they agreed that the Appropriate Assessment stage is not required.</p>	<p>through living roof, bat boxes).</p>	
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Recommendations for monitoring likely significant and uncertain effects

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

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

5C11. GREEN INFRASTRUCTURE

5C11.1 This section of the SA relates to the sustainability performance of the Revised Lambeth Local Plan Proposed Submission Version against:

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

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

Relevant policy objectivesNational Level

5C11.3 The *National Planning Policy Framework 2019* defines green infrastructure as ‘a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities’. Accordingly the NPPF recognises the value of green infrastructure in its policies regarding healthy lifestyles (para 91), air quality (para 181), planning for climate change (para 150), conserving and enhancing the natural environment (para 171) and well-designed places (para 127).

Regional Level

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

Local Level

5C11.5 The *Lambeth Green Infrastructure Strategy 2018* seeks to provide a framework for green infrastructure planning and delivery that takes account of climate change and the predicted increased in population density. It sets out an approach for managing, enhancing and creating new open space and other forms of green infrastructure in Lambeth.

Baseline conditions and existing issues

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

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

sufficient access to the three types of open spaces but 2% of the borough was deficient in access to all categories of open spaces – in locations near King’s College Hospital, Kennington and West Norwood (Lambeth Green Infrastructure Strategy Update 2018).

Likely evolution without the revised Plan

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

Assessment of revised Policies

- 5C11.8 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 11 Green Infrastructure. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft revised Plan on the objective. This review takes account of mitigation already included within the draft revised Plan.
- 5C11.9 The following policies have been screened as having potential for significant effects on this objective:

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

Delivery and Monitoring policies D1 – D5

- 5C11.10 Policies D3 and D4 on infrastructure and planning obligation make direct reference to green infrastructure. Planning obligations may be spent on green infrastructure (among a long list of other possibilities) to mitigate the impact of development. Education and awareness raising will help planners understand that provision of green infrastructure is multi-beneficial/functional – it also improves local walking and cycling (clause vii), plays a role in sustainable drainage systems and flood risk mitigation (clause xvii) and other sustainability measures (clause xxi) of policy D4, not to mention the raft of other benefits on health, air quality, biodiversity, climate change etc. SA recommendation 69 was accepted and has been incorporated in the DRLLP PSV. It was suggested that for policy D2 - presumption in favour of

sustainable development - to be beneficial, green infrastructure needs to be considered at the initial stages of planning and design, at pre-application discussions. To address this, supporting text paragraph 4.8 has been amended to reference the importance of the delivery of green infrastructure in pre-application discussions and encouraging developers to seek initial specialist advice from tree and sustainability officers as well as Natural England, as per SA recommendation 69. This amendment would also appropriately support supporting text paragraph 9.9 and is considered appropriate to achieve positive effects on SA Objective 11.

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

Housing policy H1, H5, H11

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

5C11.13 Given the area of land affected and the comprehensive redesign involved in estate regeneration schemes (and taking into account such schemes are normally subject to pre-application discussions (see paragraph 5C11.10 above)); SA recommendation 70 on the DRLLP stated that it would be useful for either policy H11 or the supporting text to make reference to green infrastructure as this would help achieve clause (h) of the policy. The recommendation was accepted and incorporated as an additional sentence to supporting text paragraph 5.107 to state that 'The requirements for provision of Green Infrastructure in policy EN1 will apply'. Recognition of green infrastructure in the policy will remind applicants and planners that green measures help create places that people want to be in and be proud of and arguably, this is needed more for estate regeneration than other types of schemes. Trees and other green measures promote social and health and well-being benefits, and again it that may be argued that this is even more important for occupiers of estate regeneration schemes. The additional supporting text is considered to positively contribute to SA Objective 11 by enhancing green infrastructure in estate regeneration schemes.

Transport policies T2, T3, T7

5C11.14 Policies T2 and T3 on walking and cycling seek to create environments conducive for increased active travel. This includes creating places that are safe, attractive and enjoyable. SA recommendation 17 on the DRLLP that was accepted and included in the DRLLP PSV to include the word 'healthy' is further supported with respect to SA Objective 11. An easy way to achieve safe, healthy and attractive walking and cycling routes is through the provision of green infrastructure. Supporting text para 8.10 makes mention of 'street trees'. This is one form of green infrastructure, but there are many other different forms. SA recommendation 71 on the DRLLP suggested 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, and such amendment would also more appropriately support policy E1(d)(iii). No change was made as a result of this recommendation as the policy team did not consider it necessary given that 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 and other planting to provide shade, clean the air and support biodiversity. The response is noted and considered appropriate to address the recommendation.

5C11.15 It was recommended on the DRLLP that the policy team may wish to consider adding that all outdoor and open parking areas (policy T7(e)(v)) contain an element of green infrastructure to help offset effects of vehicle emissions (SA recommendation 72). No change was made as a result of this recommendation as it was not considered necessary given the restrictive parking standards of the borough and the low anticipated rate of car parking provision in future new developments. The response is noted and considered appropriate to understand the restrictive nature of car parking in the borough.

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

5C11.16 Policy EN1 seeks to protect and maintain both open spaces and green infrastructure (clause (a)). It also seeks to increase the quantity of open space and green infrastructure in the borough (clause (d)). Clause (e) seeks to improve the quality of and access to, existing open space and green infrastructure, while clause (f) states that Draft London Plan policy G5 in relation to the urban greening factor will be applied to major developments. It is considered that the urban greening factor should result in significant positive effects on the quantity of green infrastructure provision in the borough, provided this is appropriately applied/conditioned into decisions on planning applications. As identified in the analysis against SA objective 10 on biodiversity, the degree and extent of positive effects for green infrastructure network depends on the rigour to which the policy is implemented at planning application stage, delivered upon completion and maintained and managed thereafter.

5C11.17 Policy EN2 on local food growing and production contributes to the provision of green infrastructure in the borough, and enables access to green infrastructure.

5C11.18 Policy EN4 states all development is required to meet high standards of sustainable design and construction feasible. Development is also required to be resilient to climate change, of which an obvious mechanism is through the provision of green infrastructure (such as living roofs and walls, increased tree canopy cover), therefore facilitating the achievement of SA objective 11.

5C11.19 It is considered that policy EN6 on sustainable drainage systems and water management should result in positive effects for green infrastructure provision.

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

5C11.20 SA recommendation 73 on the DRLLP for policy Q6 was accepted and has been incorporated in the DRLLP PSV. It is considered this amendment helps better achieve a network of green spaces in a more co-ordinated strategic way, rather than piecemeal planting. Policy Q6(v) now reads: 'new or enhanced open space (including gaps between buildings) and green infrastructure'; and supporting text paragraph 10.24 now cross references policy EN1 as follows: 'See also Local Plan policies EN1, T1, T2 and T3, and Draft London Plan policies T2 (Healthy Streets) and D7'. These amendments are considered to appropriately address SA

recommendation 73 and positively contribute to SA Objective 11.

- 5C11.21 It is considered that there is opportunity in policy Q7 urban design: new developments, to incorporate and/or integrate the natural environment into designs, particularly given the wide-ranging benefits green infrastructure offers (e.g. improvements to air quality, managed heat island effect, drainage management, health and well-being, sense of place and pride, economic values, property values). SA recommendation 74 on the DRLLP was accepted and has been incorporated in the DRLLP PSV. Supporting text paragraph 10.29 now refers to EN1 (as well as EN4). It is also recognised that the urban greening factor will apply to all major developments
- 5C11.22 Overall, policies Q9 and Q10 should result in positive effects for green infrastructure provision in the borough. SA recommendation 75 on the DRLLP was accepted and has been incorporated in policy Q10(f) of the DRLLP PSV as follows: 'Wherever appropriate, the planting of additional trees should be included in new developments *in a coordinated way to maximise the green infrastructure network*'. Additional supporting text has also been included as para 10.44. This is considered appropriate to address the SA recommendation and positively contribute to SA Objective 11.
- 5C11.23 The improvement to supporting text paragraph 10.35 of policy Q9 (that states all planning application should be supported by a landscape design scheme) as a result of SA recommendation 66, is further endorsed with respect to SA Objective 11.
- 5C11.24 Policy Q11 on building alterations and extensions further supports policy EN1 by strongly encouraging living (green) roofs on flat roofs (clause (p)). This clause is new to the DRLLP PSV and 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. It has been recommended that these words be removed. This recommendation was accepted by the policy team.

SA recommendation 12: : Remove the words 'the use of' from 'The use of living (green) roofs will be strongly encouraged for flat roofs which are not used as amenity space'.

Policy response: Accepted.

- 5C11.25 Overall it is considered that policy Q14 on development in gardens and amenity space should result in positive effects on SA Objective 11. Policy Q15 contributes to the green infrastructure network as it does not apply to hedges or screen planting.

Places and Neighbourhoods policies PN1 – PN11

- 5C11.26 SA recommendation 78 on the DRLLP was accepted and incorporated in the DRLLP PSV. Places and neighbourhoods policies have been revised to include some element of green infrastructure provision. It is recognised that other Local Plan and Draft London Plan policies on green infrastructure will apply to development proposed within places and neighbourhoods. For some places and neighbourhoods policies there is an emphasis on the Healthy Route Network, or improvement to air quality, both of which can increase green infrastructure in the environment.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

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

Table 18: Summary assessment of effects of DRLLP PSV on green infrastructure

Assessment of effects of the DRLLP PSV 2020 on SA objective 11	Score	Justification of Score	Timescale and probability	Permanent or temporary
To create, manage and enhance green infrastructure.	++/?	<p>Taking into account existing baseline conditions (and recognising data is somewhat limited) of green infrastructure, it is considered that the DRLLP PSV generally provides well for SA objective 11 and significant positive effects are anticipated, provided policies are fully considered at pre-app stage and fully implemented at decision-making of applications. Application of the urban greening factor is anticipated to result in significant positive effects for green infrastructure. Policy EN1 ensures green infrastructure and open spaces are protected and maintained, seeks to increase provision of green infrastructure, and improve quality and access to green infrastructure. There is also a much more prevalent political and social push towards improving air quality, and provision of green infrastructure is one way of helping to achieve this. Accordingly there is potential for positive cumulative effects on green infrastructure in the predominately urban existing environment, as policies EN1, T2, Q6, Q7, Q9, Q10, Q14, places and neighbourhoods policies promote increased use of green infrastructure, creation of green ways, better connections between spaces and delivery of the Healthy Routes Network. It is considered that the DRLLP SPV provides the appropriate policy context for creating, managing and enhancing green infrastructure.</p> <p>The uncertainty lies in the delivery of the green infrastructure-related policies and the extent and degree of rigour on which they are applied and if s106 funds are actually spent on increasing green infrastructure, taking into account all facets of planning policy that are weighed and considered in making decisions on planning applications, and how green infrastructure is maintained. Also recognising that often developments are not built out to how they were designed.</p>	<p>The open space network is already protected, so this is already evident and will remain evident for the entire plan period.</p> <p>Green infrastructure enhancement can be evident in the short term as some development occurs. Increased improvements and restoration are likely in the short-medium term.</p> <p>New areas of green infrastructure will likely be evident in the medium to long terms and increase in size as it takes hold and as developments and public realm projects/Healthy Routes Network are completed.</p>	Permanent provided green infrastructure is maintained appropriately .

Recommendations for monitoring likely significant and uncertain effects

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

- Number of major application approvals that meet or exceed the London Plan

Urban Greening Factor target score

- Amount of open space lost through completed planning permissions
- Change in areas of biodiversity importance
- Number of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls)

5C12. CLIMATE CHANGE AND ENERGY

5C12.1 This section of the SA relates to the sustainability performance of the Revised Lambeth Local Plan Proposed Submission Version against:

Objective 12: Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the borough for the unavoidable effects of climate change.

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

Relevant policy objectivesNational Level

5C12.3 Section 14 of the *National Planning Policy Framework 2019* is on meeting the challenges of climate change, flooding and coastal change. It states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

5C12.4 The *Climate Change Act 2008* imposes a duty on the Government to ensure net carbon emissions in the UK are at least 80% lower than 1990 levels by 2050, and to set a 'carbon budget' limiting net carbon emission for each period of five years (budgets for 2008-2022 have already been set).

Regional Level

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

Local Level

5C12.6 In January 2019, the council declared a climate change emergency and has agreed a corporate carbon reduction plan to achieve net zero carbon for council operations for 2030. The council is also developing a wider Lambeth climate change response plan to be published in 2020 and will be engaging widely, including through a Citizens' Assembly.

Baseline conditions and existing issues

5C12.6 In 2017, total energy consumption in Lambeth equated to 3.1 per cent of the total energy consumption in London and Lambeth ranked 20th out of the 33 London boroughs. Over the period 2007 – 2017 total energy consumption has fallen 14 per cent from 408.7 thousand tonnes of oil equivalent (ktoe) to 352.5 ktoe. The domestic sector accounts for 45 per cent of consumption in the borough and gas is the primary fuel type (over half), though this is reducing. It has been estimated that 13,864 households in Lambeth are in fuel poverty, representing over 10 per cent of the households in the borough (Department for Business, Energy and Industrial Strategy 2019), whereby the household is one which cannot afford to keep adequately warm by spending a reasonable proportion of its income.

5C12.7 In 2017, Lambeth had lower levels of carbon dioxide emissions at 2.8 tonnes per capita than London as a whole (3.4 tonnes) and England (5.1 tonnes) and the carbon dioxide emissions continue to fall (Department for Business, Energy and Industrial Strategy, June 2017).

Likely evolution without the revised Plan

5C12.8 While London Plan policies will apply, carbon emissions are likely to rise with increasing development and could be exacerbated by proposed levels of growth if not managed in an appropriate way for the local context. Climate change could have severe ramifications for London and Lambeth's populations, economy, wildlife, cultural heritage and materials assets.

5C12.9 There is an increasing demand for use of energy arising from population growth and increased economic activity. Intervention is needed to make more efficient use of energy including placing requirements on new developments and finding ways to improve the efficiency/sustainability of both existing and new buildings. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of revised Policies

5C12.10 This section examines the likely significant effects of implementing the proposed Revised Lambeth Local Plan Proposed Submission Version policies on SA Objective 12, climate change. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole draft revised Plan on the objective. This review takes account of mitigation already included within the revised Plan.

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

D1 – Delivery and monitoring	T3 – Cycling
D2 – Presumption in favour of sustainable development	T4 – Public transport infrastructure
D3 – Infrastructure	T5 – River transport
D4 – Planning obligations	T7 - Parking
D5 - Enforcement	T8 - Servicing
H1 – Maximising housing growth	EN1 – Open space, green infrastructure and biodiversity
H5 – Housing standards	EN2 – Local food growing and production
H11 – Estate regeneration	EN3 – Decentralised energy
ED3 – Key Industrial and Business Areas (KIBAs)	EN4 – Sustainable design and construction
T1 – Sustainable travel	EN5 – Flood risk
T2 – Walking	EN6 – Sustainable drainage systems and water management

Q9 – Landscaping	PN4 – Streatham
Q10 - Trees	PN5 – Clapham
Q14 – Development in gardens and amenity spaces	PN6 – Stockwell
Q20 – Statutory listed buildings	PN7 – West Norwood/Tulse Hill
Q27 - Basements	PN8 – Kennington/Oval
PN1 – Waterloo and South Bank	PN9 - Herne Hill
PN2 – Vauxhall	PN 10 – Loughborough Junction
PN3 – Brixton	PN11 – Upper Norwood/Crystal Palace

Delivery and monitoring policies

- 5C12.12 Policy D2 strongly encourages developers to engage in pre-application discussions and seek advice from specialist officers, and this also includes sustainability officers who will advise on ways to achieve SA Objective 12 on climate change. Section 106 planning obligations funds may be used for low carbon and renewable energy, including carbon offset (among a long list of other things) to mitigate impacts of development and therefore offers potential for significant positive effects for reducing the effects of climate change. The policy team have incorporated into the DRLLP PSV 2020 a SA recommendation to include 'energy' in policy D4(b)(i). Overall it is considered that policies D1-D4 should result in positive effects on SA Objective 12.

Housing policies H1, H5, H11

- 5C12.13 The draft London Plan requires the delivery of at least 13350 homes for the ten year period. This level of growth, unmitigated, is likely to result in increased greenhouse gas emissions, and a significant negative effect on this objective. Predicted population increase and new housing numbers over the plan period may result in an aggregated increase in CO₂ emissions. It is also noted that in combination, application of policies in the DRLLP PSV 2020 and draft London Plan are likely to progressively reduce the CO₂ emissions from residential dwellings during the course of the Plan. Within Lambeth, it is considered that that increased emissions from new housing can be mitigated through high standards of energy efficient design and construction (including encouragement to adopt Home Quality Mark / Passivhaus homes); dual aspect dwellings, district heat networks, provision of green infrastructure and patterns of development that reduce the need of private vehicle transport. Residential densities will be optimised in accordance with the design-led approach and have regard to site context, connectivity and accessibility for walking and cycling, and existing and planned public transport (including PTAL) and capacity and quality of surrounding infrastructure. However, there are uncertainties around whether their effects can be mitigated completely. These lie with the delivery of district heat networks, and the deliverability (and indeed feasibility and viability) to achieve net zero carbon targets and minimum on-site reduction targets, without adversely affecting developer interest in the borough. Uncertainty also arises from the actual uptake of Homes Quality Mark / Passivhaus approved homes delivered. It is noted that Draft London Plan policy SI2 applies to major development as does London Plan standards and guidance for housing; and DRLLP PSV policies EN3 and EN4 apply, as do Q policies (for example Q6, Q7 Q11) and that together these provide a robust policy framework to appropriately minimise energy consumption, greenhouse gases and prepare the borough for climate change while still delivering the growth.
- 5C12.14 It was recommended on the DRLLP that given the often large area and extent of housing affected in estate regeneration schemes, and the level of affordable housing required, the policy team may wish to consider how estate regeneration schemes should approach heating, energy consumption, low carbon and/or renewable use in policy H11 on estate regeneration (SA recommendation 79). It was noted in the

previous SA that policies EN3 and EN4 will apply, but that there may also be opportunity to set out expectations in policy H11 as well. No change was made as a result of this recommendation as it is considered that this is adequately addressed through policies EN3 and EN4. It was also recommended that clause (e) should also refer to policy EN4, and possibly EN3 too (SA recommendation 80). No change was made as a result of this recommendation as it was considered that all Local Plan policies will apply and a full cross-reference is not required in each policy. The responses are noted and considered appropriate given the borough-wide applicability of policies EN3 and EN4.

Economic development policy ED3 and ED1 – ED6

- 5C12.15 Policy ED3 states that Key Industrial Business Areas (KIBAs) may only be used for business, industrial, storage and waste management uses, including green industries, and it is considered that this provides a quantum of land in the borough to contribute to advancing a low carbon economy or use of renewable technologies. There are currently 31 KIBAs in the borough, as well as other sites outside of designated KIBAs in business use. While the industrial and commercial sector is a large contributor of carbon emissions (around 34% of all emissions), proliferation of green industries (including research and development) in the boroughs KIBAs will help combat climate change and emissions from all activities (residential, transport, commercial). This may contribute positively towards the objective.
- 5C12.16 The economic development policies (ED1 – ED6) generally seek to retain employment generating sites, and create new jobs and commercial activities in the borough. While such growth is likely to contribute to greenhouse gas emissions, these policies in themselves are likely to have a neutral effects. This is because areas earmarked for increased economic activity, such as Vauxhall and Waterloo and South Bank, encourage mixed use development and are located near to existing major public transport hubs, thereby reducing the likelihood of private vehicle use and the need to travel. Business use sites outside of KIBAs also allow for mixed use developments, (assessed under Draft London Plan policy E7), also reducing the likelihood of private car use. Additionally, possible negative effects of growth are mitigated by other policies within the Plan, for example high standards of energy efficiency and design, district heat networks, increased urban greening and green infrastructure and designing in climate change mitigation and adaptation measures.

Transport policies T1 – T5, T7, T8

- 5C12.17 The Lambeth Transport Strategy 2019 underpins the transport policies in the DRLLP PSV. Positively, one of the guiding principles of the Strategy is ‘clean air and carbon neutral – take bold action to clean up our air and avert climate catastrophe’. Strategic objectives include a transport network that is carbon neutral, and that is resilient to the impacts of climate change.
- 5C12.18 The transport policies seek to promote sustainable travel, particularly active travel through improving environments for walking and cycling. Policy T1 states the council promotes a sustainable pattern of development, maximising trips made by sustainable modes and reducing dependence on the private car. Implemented rigorously and consistently, clause (a) of policy T1 should address the concerns highlighted above for new housing to be located in sustainable locations (near public transport and everyday services and facilities). Furthermore, reducing reliance on the private car will help to reduce greenhouse gas emissions and their contribution towards climate change. The policies contain a clear ambition on improving the environment for walking and cycling trips and there is provision for electric charge points for both cycles and cars. Provision for car parking is minimised through policy T7 – indeed with PTAL zones 1 and 2 the policy allows for less parking spaces per

dwelling than Draft London Plan standards. All of the CAZ, Waterloo and Vauxhall Opportunity Areas, and PTAL zones 4-6 in Lambeth are car-free (in terms of car parking) under Draft London Plan standards. It is considered these policies seek to avoid, or at the very least limit significantly, private vehicle greenhouse gas emissions associated with new housing growth in the borough. It is recognised that much of the existing housing stock has provision for car-parking, whether off-street or on-street.

5C12.18 Policies T2 and T3 (walking and cycling) promote the benefits of active travel, which results in no adverse environmental impact or emissions, and has many health benefits. Lambeth will promote a reduction in car ownership and private car trips through car parking provision lower than Draft London Plan standards (for areas of PTAL 1 and 2) through policy T7 (parking). By lowering car parking provision in the borough and seeking to reduce reliance on the private car, policy T7 positively contributes to SA Objective 12 by reducing greenhouse gases (although it is recognised that much of the existing housing stock does have some provision of car parking and so it won't be until the long-term where car-free developments are a significant proportion of the housing stock). Policy T8 promotes sustainable freight and servicing. It seeks to reduce the number of deliveries and servicing trips and that zero emission vehicles should be used for servicing wherever possible and consolidated deliveries are expected to be of this type. While this is commended, enforcing deliverability of use of zero emission vehicles might be difficult / uncertain, at least in the short-medium term. It is noted that clause (j) states planning obligations will be used to help secure and enforce appropriate arrangements.

5C12.XX Overall, given the level of growth required in the borough through Draft London Plan housing targets and regeneration of Opportunity Areas; it is considered that the transport policies are likely to result in some positive effects on the achievement of SA Objective 12 in terms of reducing and managing emissions arising from transportation.

Environment policies EN1 – EN5

5C12.19 The DRLLP PSV 2020 contains good policy on the protection of open spaces and green infrastructure, increasing the quantity and improving the quality of open space and green infrastructure. Application of the new urban greening factor in major developments is considered likely to significantly increase green cover in the borough, provided it is implemented with rigour at planning application decision making, when considered and weighed against all other variables part of the planning process. The policy also supports living roofs and walls. A layer of vegetation can reduce heat loss from buildings, cutting the wind chill factor by 75 per cent and heating demand by 25 per cent (Cambridge University). Living walls and green roofs provide environmental benefits which can save money in heating and cooling costs, minimise energy consumption and extend the lifespan of roof membranes and heating, ventilation and air conditioning equipment. Furthermore, living roofs and walls contribute to carbon sequestration, and are also effective climate change adaptation measures. Green spaces help remove carbon dioxide from the atmosphere, and therefore, provided the management of green spaces does not create carbon that exceeds the level vegetation can remove; the protection and enhancement of open spaces and green infrastructure in terms of reducing heat island effect and reducing impacts of climate change is commendable and thus supported.

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

- 5C12.21 A significant local plan policy for the attainment of SA Objective 12 is Policy EN3 on decentralised energy. The policy seeks to expand decentralised heat networks in the borough, either by connecting to or extending existing networks or make provision to connect to any planned future decentralised energy network in the vicinity of the site. Major development proposals that cannot immediately connect to an existing heating network should follow the heating hierarchy set out in the Draft London Plan meet Draft London Plan requirements (policy SI3). Green technology and sustainable design and construction is a rapidly evolving field and during the plan period, it is hopeful the costs associated with green technologies including decentralised heating networks, will reduce, particularly as more zero-carbon developments are delivered in line with Government policy. However, there is some uncertainty in the delivery of district heat networks, particularly in identifying Energy Centres, and possible uncertainty on trade and negotiations with the UK's departure from the EU and how this may impact on low carbon/ decentralised energy industries/infrastructure delivery.
- 5C12.22 Policy EN4 provides for sustainable design and construction. Lambeth will apply Draft London Plan policies on minimising greenhouse gas emissions (SI2) and managing heat risk (SI4). The application of draft London Plan policy SI2 – minimising greenhouse gas emissions should result in positive effects on the attainment of SA objective 12. DRLLP PSV also includes new policy that states minor new-build residential developments, including proposals that involve extensions or change of use to provide dwellings, must achieve a minimum on-site reduction in regulated carbon emissions of at least 19% beyond Part L of the Building Regulations, unless demonstrated not feasible. This is commended and helps achieve SA Objective 12. While minor developments are unlikely to have significant sustainable design implications on their own, the cumulative impact on energy consumption and carbon emissions is significant. The Building Regulations help to ensure, to some degree, that carbon emissions from minor developments are minimised by setting minimum energy efficiency requirements for new-build and existing developments, including material changes of use and extensions. New build residential developments are encouraged to use the Home Quality Mark and Passivhaus design standards. Non-residential developments, including major refurbishments, are expected to meet at least BREEAM 'excellent' rating. Achieving energy credits as part of a BREEAM rating can help demonstrate that energy efficiency targets have been met. The policy also includes new supporting text encouraging all development to achieve a 20% reduction in CO2 emissions from on-site renewable energy generation. Again, this is commended. 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. This has been accepted by the policy team and the following text has been added to the end of para 9.30 in the DRLLP PSV 2020: 'Where possible, this should be in addition to the required reductions through energy efficiency measures.' It is noted that the supporting text recognises changes are occurring nationally with regards to energy efficiency requirements in Part L of the Building Regulations and introduction of Future Homes Standard in 2025. It is also considered that the policy helps positively support the council's ambitions for addressing climate change.

SA recommendation 13: 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.

Policy response: Accepted. The following text has been added to the end of para 9.30 in the DRLLP PSV 2020: 'Where possible, this should be in addition to the required reductions through energy efficiency measures.'

- 5C12.23 Overall, and taking into account the level of growth proposed for the borough (in line with Draft London Plan targets), it is considered that policy EN4, together with applicable Draft London Plan policies should result in positive effects in terms of minimising energy consumption, reducing greenhouse gases and preparing the borough for the unavoidable effects of climate change. Importantly, policy EN4 requires development to be resilient to climate change by including climate change adaptation measures. The achievement of significant positive effects from policy EN4 is dependent on deliverability of energy efficient design and construction (i.e. low U-values and air permeability rates), low carbon technology and the extent of adaptation measures implemented, and would likely vary from one scheme to another. Detailed guidance will be provided in updated London Plan Supplementary Planning Guidance for Sustainable Design and Construction, which should help maximise positive effects.
- 5C12.24 It is considered that policy EN5 on flood risk has a significant positive effect on SA Objective 12 (particularly in terms of climate change adaptation). It appropriately addresses and minimises effects on developments of flood risk, including impacts arising from future climate change. Similarly it is considered that policy EN6 on drainage and water management appropriately reduces the impacts of climate change and ensures adaptation to the future impacts of climate change.
- Quality of built environment policies Q6, Q7, Q9, Q10, Q11, Q14, Q18, Q20, Q27**
- 5C12.25 Quality of built environment policies in the DRLLP PSV have been significantly strengthened (compared to the DRLLP 2018) in terms of designing for climate change mitigation and adaptation. Policies Q6, Q7, Q11 and Q18 now contain explicit reference to climate change. It is considered that these new clauses in policy should significantly improve the built environments ability to reduce greenhouse gases and prepare for the unavoidable effects of climate change. The public realm will see climate change adaptation measures such as urban shading and SUDS, while the urban design of new developments will also include climate change mitigation measures as well, such as passive solar design. Importantly, the policy recognises the risk of maladaptation. Policy Q11 on building alterations and extensions seeks to include energy efficiency improvements such as more efficient plant, improvements to thermal performance and renewable energy generation; and climate change adaptation measures such as improved shading on southern elevations and natural ventilation. The cumulative impact of these policy amendments in the reduction of greenhouses gases is likely to be significant over-time as developments are delivered or altered. It is also considered these policies help protect certain equality protected groups, for example age, disability and those with certain health conditions as overheated buildings and environments can be potentially lethal.
- 5C12.26 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...'. This recommendation has been accepted by the policy team and included in the DRLLP PSV 2020.

SA recommendation 14: that adaptation is also included in policy Q18

Policy response: Accepted.

- 5C12.26 In terms of policies Q9 landscaping and Q10 trees and Q14 (development in gardens), new tree planting and other greenery helps reduce the heat island effect, provides shading, cools ambient air temperatures and contributes to improved air quality through filtering particulates which all help achieve SA Objective 12.
- 5C12.26 Achieving improved energy efficiency in listed buildings and within conservation areas may be challenging and costly. Certain types of glazing, solid wall insulation and low and zero carbon micro-generation technologies may be less suitable or more expensive to install. Paragraph 10.111 of the supporting text to policy Q20 statutory listed buildings, states that glazing for window replacements of listed building should be single glazing with a putty finish in the traditional manner. This will likely limit the extent of energy efficiency achievable in such buildings. However, older buildings are not necessarily less energy efficient. Many historic buildings perform well in terms of energy efficiency. Thick walls and small windows of many vernacular buildings provide them with a high thermal mass that keeps them warmer in winter and cooler in summer, while terraces can be more energy-efficient than some detached houses because of their smaller surface area. In a hotter climate, the natural ventilation, high ceilings and generous proportions of many historic buildings may also make energy-intensive air conditioning less necessary than in more recently built structures.
- 5C12.27 Similarly, it should be acknowledged that historic buildings represent a significant past investment of energy and materials. Demolition and replacement means not only losing all of the resources embodied in the original building, but also the investment of yet more energy for demolition, the creation and delivery of new construction materials, the building process itself, and the disposal of the consequential waste, resulting in increased carbon emissions and quantities of waste.
- 5C12.28 To increase energy efficiency of heritage assets it may be appropriate for heritage assets to link to district network schemes as this could alleviate some of the need for more immediate impacts on heritage assets such as the installation of micro-renewable technologies. The protection of settings of listed buildings (often generous green spaces) also provides climate change mitigation and adaptation responses. The SA on the DRLLP recommended that recent guidance on energy efficiency and historic buildings prepared by Historic England be referred to in policy Q18, as well as in the council's Historic Environment Strategy (policy Q18) (SA recommendation 81). No change was made as a result of this recommendation as Historic England has extensive guidance on a wide range of topics and it is not considered necessary to focus on one particular area, especially given the policy already signposts to the Historic England suite of guidance generally. The response is noted and considered appropriate given the volume of guidance produced and available by Historic England, and that their guidance documents generally available are referenced.

Places and neighbourhoods policies

- 5C12.29 Such development as that proposed under some PN policies, particularly PN1 – PN4 and PN 7 will inevitably result in increased energy consumption and greenhouse gas emissions. There are a number of ways in which the DRLLP PSV 2020 seeks to mitigate effects associated with development (as described in the above policy analysis and also Draft London Plan policies). Much significant development in the borough is proposed within existing town centres which promote mixed use development, aim to reduce the need to travel, and maximise and enhance public transport accessibility and environments for active travel. Increased provision of

green infrastructure is required from developments and all developments need be to a high standard of sustainable design and construction, and be resilient to climate change. Policy PN2 for Vauxhall also makes reference to climate change and CO₂ reduction methods, as well as district heating networks, as does Brixton. Other than that, PN policies are generally silent on carbon reduction and impacts of climate change, and climate change mitigation and adaptation. However, it is recognised that other Local Plan and Draft London Plan policies will apply to these places and neighbourhoods, and repetition in every place specific policy may not be considered necessary.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

- 5C12.30 Overall, and taking into account the criteria outlined in the Sustainability Framework, and the housing growth requirements on the borough as set out in the draft London Plan, it is possible that the Revised Lambeth Local Plan Proposed Submission Version could have a positive effect on reducing greenhouse gas emissions relative to the growth imposed, and there are likely to be improvements to the borough's ability to adapt to climate change. Implementation of policies will ensure that new developments are also likely to be better adapted to the predicted changes in climate through sustainable design, as well as higher levels of resource efficiency.

Table 19: Summary assessment of effects of DRLLP PSV on climate change

Assessment of effects of the DRLLP PSV 2020 on SA objective 12	Score	Justification of Score	Timescale and probability	Permanent or temporary
Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	+/?	<p>Levels of growth projected for the borough is likely to result in increases in greenhouse gas emissions. However, it is considered a robust policy approach to mitigate effects is provided through draft London Plan policies (for example SI2, SI3, SI4) and DRLLP SPV policies (for example EN3 EN4 together with transport policies, design policies and spatial development policies).</p> <p>Taking into account growth required by the draft London Plan, review of Lambeth Local Plan policies concludes that there is a possible positive impact on this objective through policies which act to minimise energy consumption and reduce carbon emissions through development. Examples of these are district heat networks, more energy efficient design and construction, living roofs and walls, climate change mitigation and adaptation measures in the design of developments, application of the urban greening factor, encouraging mixed use developments near public transport hubs, and improvements for facilitating active travel.</p> <p>The exact scale of greenhouse gas emissions associated with the implementation of the policies and proposals contained in the DRLLP PSV will be dependent on a number of factors including: the exact design of new development; future travel patterns and trends; individual energy consumption behaviour; and the extent to which energy supply has been decarbonised over the plan period. Also, buildings are often not built out to how they were designed. Uncertainties also lie with the delivery of district heat networks, and the level of obligation on developers (and indeed feasibility and viability) to exceed carbon reduction targets, without adversely affecting developer interest in the borough. Advancement of new green technologies and associated reductions in costs of these technologies will help achieve the objective.</p> <p>It is positive that the DRLLP PSV generally encourages sustainable patterns of urban</p>	<p>The impact of reduced greenhouse gas emissions will be achieved over the long-term. The probability of this occurring is dependent on the delivery of public transport improvements, delivery of sustainable building and design standards (i.e. Home Quality Mark and/or Passivhaus and BREEAM standards); delivery of district heating networks and other developments being linked into them and the technical feasibility and viability of installing small scale renewable energy or low carbon technologies. In the short-term, there continues to be uncertainty in technology development/supply and construction due to the uncertain terms under which the UK will leave the EU and the current difficult economic</p>	<p>Temporary increases in emissions may result as a consequence of demolition and new construction.</p> <p>In other respects effects of reduced greenhouse gas emissions are considered to be permanent with respect to emissions given the number of DRLLP PSV policies that either directly or indirectly seek to reduce greenhouse gas emissions.</p>

	<p>development which actively seek to reduce reliance of the private motor car. It is considered that adaptation to climate change is provided for in policies. Living roofs and walls and the urban greening factor are considered a critical component of adaptation measures.</p> <p>A significant portion of the Boroughs emissions come from housing (approx. 41%), and the delivery of new housing is a DRLLP PSV and Draft London Plan priority. Provided developments are delivered in a sustainable manner that reduces the need to travel, and buildings (new and existing) are more energy efficient in design and construction, and district heating networks are delivered; it is considered that the necessary growth can be achieved in a way that minimises energy consumption, in so far as possible through planning policy.</p>	<p>climate the UK is in.</p>	
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Recommendations for monitoring likely uncertain effects

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

- The proportion of schemes achieving policy requirements relating to carbon dioxide emission reductions
- Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score
- Amount of open space lost through completed planning permissions
- Change in areas of biodiversity importance
- Number of major application approvals for non-residential developments achieving BREEAM Excellent
- Number of homes built to Home Quality Mark or Passivhaus standard
- Number of DHNs in the borough and dwellings/premises linked to them.

5C13. WATER RESOURCES AND FLOOD RISK MANAGEMENT

5C13.1 This section of the SA relates to the sustainability performance of the Revised Lambeth Local Plan Proposed Submission Version against:

Objective 13: To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.

5C13.2 To achieve this objective, plan policies should improve the quality of water and waterbodies; reduce piped water consumption e.g. through reducing demand and encouraging recycling in households; reduce waste water and sewage needing processing; support sustainable urban drainage and; minimise the risk of all types of flooding (tidal, fluvial, surface water and sewerage) to people and property and manage flood risks appropriately both now and in the long-term.

Relevant policy objectivesNational Level

5C13.3 Paragraphs 155 - 165 *National Planning Policy Framework 2019* relate to flood risk and sustainable urban drainage systems. Local Plans should apply a sequential, risk-based approach to the location of – taking into account the current and future impacts of climate change – so as to avoid where possible flood risk to people and property.

Regional Level

5C13.4 *London Regional Flood Risk Appraisal – 2018* represents important evidence to underpin the new draft London Plan. The level of detail of data used and the resulting mapping has greatly improved compared to the previous RFRA, providing better information and evidence for Local Plans, Opportunity Area Planning Frameworks, and infrastructure providers.

5C13.5 Draft *London Plan* policy SI5 seeks to minimise the use of mains water, water supplies and states that resources should be protected and conserved in a sustainable manner. Development proposals should minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption) and meet at least BREEAM excellent standard for water category. Policy SI12 sets out the strategic approach to flood risk in London. Development plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Surface Water Management Plan, where necessary, to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Policy SI13 is on sustainable drainage, whereby the well-established drainage hierarchy is at the centre of the policy. It will help to reduce the rate and volume of surface water run-off. Rainwater should be managed as close to the top of the hierarchy as possible. The role of blue roofs is specifically highlighted in the new policy. They can be green roofs engineered to retain water or attenuation tanks at roof or podium level. The combination of a blue and green roof is particularly beneficial as the attenuated water is used to irrigate the green roof.

5C13.6 *Thames Estuary 2100 (TE2100)* is a long term flood risk management plan for London and the Thames estuary. It sets out the strategic direction for managing flood risk in discrete policy areas across the estuary, and contains recommendations on what actions the Environment Agency and others will need to take in the short (next 25 years), medium (the following 40 years) and long term (to the end of the century). Lambeth falls within Action Zone 2 – Central London, of the TE2100 Action Plan.

Local Level

- 5C13.7 The Strategic Flood Risk Assessment 2013 also identifies spatial variation in flood risk from fluvial and surface water flooding. It contains guidance for developments in flood risk areas as well as hazard and depth maps. Maps divide the borough into zones on the basis of the probability of flooding occurring, ignoring the presence of any flood defences / alleviation measures. Areas identified in the SFRA as at highest risk of fluvial and tidal flooding in Lambeth are Waterloo, Vauxhall and adjacent to the River Graveney. An addendum to the SFRA 2013 has been prepared that takes account of the updated breach data modelling provided by the Environment Agency.

Baseline conditions and existing issues*Fluvial flooding*

- 5C13.8 The key main rivers within Lambeth Borough are:
- River Thames;
 - River Graveney; and
 - River Effra
- 5C13.9 The tidal River Thames runs along the northern boundary of the London Borough of Lambeth from Nine Elms and Vauxhall in the west to the Oxo Tower in the east. The 3.2km frontage is actively defended by raised embankments and hard defences that protect Lambeth from large scale flood events.
- 5C13.10 The tidal limit of the River Thames is situated at Teddington Weir approximately 15km upstream of Lambeth. The borough is therefore potentially at risk from both fluvial and tidal flooding from the Thames.
- 5C13.11 A 1km stretch of the River Graveney, a tributary to the River Wandle runs through the Streatham / Norbury area to the southern extent of the borough, joining the Wandle at South Wimbledon. The source of the River Graveney is located in the vicinity of Selhurst and the upper reaches are often referred to as the Norbury Brook. The watercourse is canalised throughout Lambeth.
- 5C13.12 The River Effra flows entirely underground. It rises to the south of Lambeth near Crystal Palace, and flows in a northerly direction through Norwood Cemetery, Dulwich, Herne Hill, Brockwell Park, Brixton, Kennington to flow out into the Thames by Vauxhall Bridge.
- 5C13.13 London has reasonable high levels of rainfall, but the density of population means that water usage is also going to be increasingly important in the future. The south east of England is an area of serious water stress and water efficiency measures will be essential to support new growth in the borough. Lambeth is within the London Resource Zone. Average household water consumption for Lambeth is about 166.5 litres per person per day (Environment Agency 2012).

Likely evolution without the revised Plan

- 5C13.14 In the absence of the DRLLP PSV 2020 the current local plan 2015 would be considered out-of-date by 2020 and the council will need to rely on the London Plan and NPPF policy. Annex 5 of the DRLLP PSV 2020 contains useful detail on the restrictions on development in the various flood zones. Water supply issues may be less appropriately managed in new developments; the uptake of sustainable urban drainage systems may be lower, and development may not appropriately reflect local flood risks in the borough. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of DRLLP PSV 2020 Policies

5C13.15 This section examines the likely significant effects of implementing the proposed DRLLP PSV 2020 policies on SA Objective 13, water resources and flood risk. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the proposed Plan.

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

D1 – Delivery and monitoring	Q6 – Urban design: public realm
D2 – Presumption in favour of sustainable development	Q9 – Landscaping
D3 – Infrastructure	Q14 – Development in gardens and amenity spaces
D4 – Planning obligations	Q27 – Basement development
H1 – Maximising housing growth	PN1 – Waterloo and South Bank
H5 – Housing standards	PN2 – Vauxhall
H10 – Gypsy and traveller needs	PN3 – Brixton
H11 – Estate regeneration	PN4 – Streatham
T5 – River transport	PN5 – Clapham
T7 – Parking	PN6 – Stockwell
EN1 – Open space, green infrastructure and biodiversity	PN7 – West Norwood/Tulse Hill
EN4 – Sustainable design and construction	PN8 – Kennington/Oval
EN5 – Flood risk	PN9 – Herne Hill
EN6 – Sustainable drainage systems and water management	PN 10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace

Delivery and Monitoring policies D1 – D4

5C13.17 The above policies seek to work with partners on delivering infrastructure, including water and flood management infrastructure, that will result in improved quality of water and water infrastructure, such as Thames Tunnel, and improvement works for the River Graveney, including flood storage and riparian bank improvements. In terms of improving water quality, significant positive effects are considered likely to result and improvements to flood defences is likely to reduce flood risk of surrounding areas. SA recommendation 82 on the DRLLP was accepted and had been incorporated in the DRLLP PSV. Clause (xvii) of policy D4 (b) has been amended to include reference to ‘flood risk mitigation’ along with sustainable drainage systems. The policy team noted that ‘flood risk mitigation’ was more appropriate than ‘flood defences’ as it includes flood defences as well as other measures that mitigate flood risk. The response is noted and considered appropriate to address SA recommendation 82, thus positively contributing to SA Objective 13.

Housing policy H1, H5, H10

5C13.18 A significant number of new dwellings (at least 1335 per annum in line with draft London Plan requirements) are proposed for delivery in the borough. Inevitably, this policy will result in increased water use and may increase flood risk if not managed or considered appropriately through development. Whilst an increase in population and number of houses may have an aggregate increase on the demand for water, it is considered such effects are mitigated by policies elsewhere in the plan. It is also important to note that the SHLAA (Strategic Housing Land Availability Assessment) considered flood risk when calculating the potential housing capacity in London.

5C13.19 A number of Local Plan policies seek to mitigate impacts on the objective. Where located in identified flood zones, the design of housing will need to provide for flood risk, and policy EN5 Flood Risk seeks to mitigate possible adverse effects from on

and off-site flooding for all sources of flooding (including fluvial, tidal, surface water run-off, groundwater, ordinary watercourse, sewer and reservoir). Large scale new development, such as that proposed for Vauxhall, provides significant opportunity to incorporate flood resilient design and appropriate design to mitigate surface water run-off. Lambeth policy EN4 states all dwellings will need to be built to a high standard of sustainable design and construction, and consider climate change, which should also incorporate water management features in housing design. Policy H5 states that external communal amenity areas should incorporate effective water management. Policy H10 Gypsy and traveller needs state that any new site proposed must have connection to essential services such as water, sewerage and drainage and must not be located in an area at high risk of flooding. This is considered to positively contribute to attaining SA Objective 13 for the gypsy and traveller community.

Transport policies T5, T7

- 5C13.20 Transport policies seek to discourage private vehicle journeys and encourage more sustainable forms of travel including walking, cycling and public transport. By discouraging private vehicles and encouraging car-free developments; better water quality can result from reduced contaminants in surface water run-off from roads. The DRLLP PSV improves on the DRLLP by stating that developments in proximity to the Thames should consider using the river for the transportation of construction materials and waste, including through the use of nearby safeguarded wharves in the neighbouring London Borough of Wandsworth. This will help reduce surface water runoff contamination from roads. Similarly, permeable parking surfaces provide areas of land where water can infiltrate into the ground reducing runoff rates and discharges into wastewater network. Policy T7, clause (d) (vi) has been amended in response to SA recommendation 6 to clarify that all outdoor and open parking areas should be permeable to water. This positively contributes to SA Objective 13 by improving the quality of surface waters and groundwater. Policy T5 on river transport ensures that any new pier or improvement to an existing pier will not have an adverse impact on the flood defences of the Thames.

Environment policies EN1, EN4 – EN6

- 5C13.21 Open spaces and urban greening can also act as flood storage areas, reducing the amount of surface water flooding and runoff by allowing infiltration of water into the ground. It is considered that policy EN1 indirectly supports sustainable urban drainage systems, improves the quality of surface waters and groundwater and minimises flood risk, therefore resulting in significant positive effects on the attainment of SA Objective 12. Increased provision of green infrastructure also contributes to reducing run-off which, in turn, helps to minimise flood risk. The policy supports living walls and roofs which can also contribute to sustainable drainage and effectively reduce the risk of localised flood by reducing surface run-off.
- 5C13.22 Policy EN4 seeks sustainable design and construction of all developments, including residential (Home Quality Mark and Passivhaus encouraged), non-residential (BREEAM) and construction of the public realm (CEEQUAL). The BREEAM tool contain standards for water consumption and surface water run-off. The approach for water infrastructure is set out in the draft London Plan policy SI5 C and E.
- 5C13.23 Policy EN5 is on the management of flood risk for the borough whereby the impact of flood will need to be minimised and the outcomes of the SFRA respected. Areas identified as at highest risk of fluvial and tidal flooding are Waterloo, Vauxhall and adjacent to the River Graveney. The policy also states that development should be steered towards areas of lowest flood risk. However, significant development is proposed in the draft London Plan (and subsequently in the DRLLP PSV) for the

Waterloo and Vauxhall Opportunity Areas. Implementation of policy EN5 should help to manage and reduce flood risk as much as possible with sequential tests met. Annex 5 of the DRLLP PSV 2020 set out restrictions on developments in the different flood zones.

5C13.24 It is considered that policy EN6 on sustainable drainage systems and water management, together with policy EN5, will mitigate the negative effects of the level of growth provided for the borough on water resources and flood risk management – the policies should be effective in improving the quality of surface waters and groundwater, the wise management of water, and in minimising flood risk through ensuring appropriate flood storage capacity and flood risk design of developments. Policy recognises it is essential for adequate local public sewerage network infrastructure to be in place or able to be provided ahead of development to avoid unacceptable impacts on the environment such as sewage flood of residential and commercial development and pollution of land and watercourses. Where there is a capacity constraint, the council will, in appropriate circumstances, apply phasing conditions to ensure necessary infrastructure upgrades are delivered ahead of the relevant development phase. The policy seeks to minimise water consumption and the pressure on the combined sewer network through incorporating water efficiency measures into developments.

5C13.25 The success of the policies is largely dependent on the extent and variety of water efficiency measures implemented, ambitiousness and commitment to conform to the policies, enforcement and how buildings are used by occupiers. Therefore effects are likely to be uncertain particularly in short term while development occurs, measures like SUDs are delivered and innovative approaches such as grey water recycling are more mainstream with a decrease in costs, and a step-change in behaviour and use of occupiers of buildings.

Quality of built environment policies Q6, Q7, Q9, Q14, Q27

5C13.26 Policy Q6 on urban design public realm supports development that provides (among other things) permeable paving. Supporting text paragraph 10.22 states that ‘it is important that public realm works are consistent with the council’s agreed standard streetscape materials and street furniture’. It was noted in the previous SA on the DRLLP that in order to achieve positive effects with regards to SA objective 13, the policy team must be satisfied that the council’s agreed standard streetscape materials include permeable paving. It was therefore recommended that further information be provided on the ‘agreed standard streetscape materials’ – perhaps by an online link to improve transparency and for clarification (SA recommendation 83). No change to the DRLLP PSV was made as a result of this recommendation as it was noted that the policy does not specify materials. Furthermore, separate from the Local Plan process, the council will be preparing a Highways Manual guidance which will include schedules of appropriate paving materials. The response is noted and considered appropriate to address the concern regarding streetscape materials.

5C13.XX The policy has however been significantly improved with regards to climate change and predicted increase in rainfall and the use of sustainable drainage systems. Development will be supported where ‘climate change adaption measures such as sustainable urban drainage systems, urban shading and heat reduction measures’ are incorporated. Policy Q7 also includes support for developments that ‘includes climate change mitigation and adaptation measures such as passive solar design, sustainable urban drainage systems, urban shading and heat reduction measures’. This will result in both public realm and urban design of developments that have positive effects for SA Objective 13 as well as 12 (climate change), 7 (liveability) and 2 (health).

- 5C13.27 Landscaping can refer to both soft and hard landscaping. Policy Q9 landscaping enables positive effects for managing surface water runoff and minimising flood risk. Landscaping of developments needs to maximise opportunities for greening (thereby contributing to reducing runoff rate) and should provide sustainable drainage and minimise surface runoff. Policy Q14 on development in gardens should ensure that in front gardens, soft landscaping is retained and any car parking surface is permeable to water.
- 5C13.28 Supporting text paragraph 10.148 identifies parts of Vauxhall and Waterloo as appropriate locations for tall buildings. These areas are also known flood risk areas. Provided such buildings are designed to be flood resistant and resilient (in line with policy EN5 and draft London Plan SI12), it is considered that tall buildings in these locations are more likely to reduce flood risk to people and property above the flood level than more traditional lower built dwellings/buildings.
- 5C13.29 Basement development will only be supported provided no unacceptable impacts will result to surface flow and flooding, and subterranean ground water flow (among other things). Basement accommodation will generally be expected to incorporate sustainable drainage measures or any other mitigation measures where required. Supporting paragraphs 10.156 further explains how basements can be vulnerable to flooding. Overall it is considered that the basements policy adequately considers water management and flood risk.
- Places and neighbourhoods policies PN1 – PN11***
- 5C13.30 The level of growth proposed in these policies is inevitably going to place increased stresses on the water resource and such growth is likely to have a significant negative effect on reducing water use. The whole of Waterloo and Vauxhall opportunity areas, and part of the Kennington/Oval area, are within flood risk zones. While this is recognised in supporting text, policies PN1, PN2 and PN8 are silent on flood risk. Mitigation of the effects of the development proposed in the places and neighbourhoods policies will be provided through other relevant policies on water and flood risk, particularly EN4, EN5 and EN6. It is considered that DRLLP PSV policies do seek to improve the quality of surface waters and groundwater, achieve wiser management of water and more sustainable use of water. Uncertainties arise around the fact that the success of these policies is dependent upon implementation, water consumption behaviour, attitude and use of occupiers, ambitiousness sought by developer/encouraged by the council, and enforcement.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

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

Table 20: Summary assessment of effects of DRLLP PSV on water and flood risk

Assessment of effects of the DRLLP PSV 2020 on SA objective 13	Score	Justification of Score	Timescale and probability	Permanent or temporary
To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	+/?	<p>It is accepted that there is likely to be increases in water use and increased vulnerability to flood risk associated with the levels of growth projected for the borough.</p> <p>However whilst increases in population, and the number of houses, may have an aggregate increase on the demand for water, such effects are mitigated by policies in the DRLLP PSV and/or draft London Plan. Similarly, effects on flood risk from increased growth are mitigated to some extent through flood risk policies and other policies that indirectly reduce flood risk (e.g. open spaces, green infrastructure, sustainable urban drainage systems).</p> <p>Still, it is unclear from the appraisal of Lambeth's policies whether they will be able to completely mitigate the effects of the new development. Policy EN6 on sustainable drainage systems and water management, together with policy EN5, should be effective in improving the quality of surface waters and groundwater, the wise management of water, and in minimising flood risk through ensuring appropriate flood storage capacity, increased permeable surfaces, provision for water recycling in developments and flood resilient design. Use of the River Thames for transportation should also help protect quality of waterways from removing heavy vehicles (carrying for example construction waste) from roads thereby reducing contamination from road runoff.</p> <p>The success of the policies is largely dependent on the extent and variety of water efficiency measures implemented, ambitiousness, extent and commitment to comply with the policies, enforcement, and behaviour, attitude and use of water by occupiers of buildings. Also, it is recognised that buildings and developments are often not built out to how they were designed. Therefore effects are likely to be uncertain particularly in short term while development occurs, measures like SUDs are delivered and until innovative approaches such as grey water recycling are more mainstream and associated costs decrease.</p> <p>Policy EN5 Flood Risk provides a realistic response in addressing flood risk while meeting draft London</p>	<p>All development in identified flood zones two and three will be subject to the sequential and exception tests. Flood risk assessments will be required at more local levels (site specific) therefore it is likely that flood risk will be managed through design, landuse, and emergency management procedures.</p> <p>It is likely that redevelopment of Opportunity Areas will be completed in the mid-long term. Delivery of SUDS and living roofs and walls will occur concurrently with development and therefore is unlikely to be evident until the mid to long term, particularly as such features become established.</p>	Permanent

	<p>Plan housing targets and developing the Opportunity Areas. The policy also recognises the sequential and exception tests of the NPPF.</p> <p>However, given that delivery of the DRLLP PSV proposes significant development in Opportunity Areas along the Thames; in order to reduce and manage flood risk, there will be great dependence on design, emergency planning and upgrade and maintenance of defence systems (the latter two outside the scope of development plan documents). Further development and intensification probably does not reduce risk, but design can mitigate flood effects should defences be breached (i.e. manages the flood risk) and therefore minimises flood risk. Tall buildings for example can reduce flood risk for dwellings / commercial space above the flood level.</p> <p>Therefore, it is considered that the cumulative effects of attaining SA Objective 13 are largely dependent upon implementation. It is for this reason that effects are to some extent uncertain. Developments in Opportunity Areas need be of highest quality design, but this must also incorporate flood resilience.</p> <p>The design of new developments, including alterations to existing developments requires consideration of natural resources like water. Installation and incorporation of water efficiency measures are expected. However, delivery of water demand measures such as greywater recycling and rainwater harvesting is uncertain, particularly if it can be demonstrated as making developments unfeasible or unviable.</p>		
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Recommendations for monitoring of uncertain effects

5C13.32 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Number of developments which have had Surface Water Flood Risk Assessments approved by the Environment Agency and incorporate sustainable urban drainage systems
- Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality issues.

5C14. WASTE

5C14.1 This section of the SA relates to the sustainability performance of the DRLLP PSV 2020 against:

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

5C14.2 To achieve this objective, plan policies should aim to minimise the production of waste, maximise recycling and reuse during construction, and decrease the demand for raw materials from unsustainable sources e.g. through reusing demolition material onsite and using products made from recycled materials; make waste avoidance, reuse and recycling easy for residents and visitors; help develop markets for recycled products by using them; enable safe storage of waste and recycling, convenient for both residents and collectors; and make appropriate provision for waste management facilities in the borough to help meet the London Plan apportionment and self-sufficiency targets.

Relevant policy objectivesNational Level

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

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

Regional Level

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

Baseline conditions and existing issues

5C14.5 Lambeth is a Waste Planning Authority and a Waste Collection Authority. The Western Riverside Waste Authority (WRWA) is the Waste Disposal Authority for Lambeth, Wandsworth, Hammersmith and Fulham, and Kensington and Chelsea.

5C14.6 The main types of waste arising in Lambeth are household, business and construction waste. Lambeth produces around 121,000 tonnes of local authority collected waste a year and around 100,000 tonnes of business waste. The majority of Lambeth's waste is exported to facilities within London in the first instance (see Box below) (Lambeth Waste Evidence Base 2019). The London-wide recycling target

is 50 per cent by 2025. By achieving a 37 per cent household recycling rate and 60 per cent recycling rate of local authority collected commercial waste, Lambeth plans to achieve a 44 per cent Local Authority Collected Municipal Waste recycling rate by 2025 (Lambeth Municipal Waste Management Strategy 2011 – 2031). Lambeth's current recycling rate for 2018/19 was 23.7 per cent.

Box 8: Exports by destination (all waste streams)

Destination facility type	2013	2014	2015	2016	2017
Treatment	36,620	45,465	88,401	101,195	61,670
Transfer	24,603	35,458	25,281	88,016	61,333
Landfill	8,377	14,777	24,369	16,890	50,974
Other	1,553	6,601	877	296	3,318
Total exports²	71,153	102,301	138,928	204,088	177,295

5C14.7 The boxes below shows that waste exports have been increasing over recent years up to 2017, from which there was significant drop in waste exports. However, the proportion being exported outside of London is decreasing (Lambeth Waste Evidence Base 2019).

Box 9: Exports by destination 2013-2017 (all waste streams)

Destination	2013	2014	2015	2016	2017
London	63,273 (89%)	83,744 (82%)	118,848 (86%)	189,915 (93%)	129,658 (73%)
South East	5,250 (7%)	6,345 (6%)	15,316 (11%)	10,385 (5%)	40,678 (23%)
East of England	2,507 (3.5%)	12,175 (12%)	4,660 (3%)	3,353 (1.5%)	6,487 (3.5%)
Other	123 (0.5%)	36 (0%)	104 (0%)	435 (0.5%)	472 (0.5%)
Total exports	71,153	102,301	138,928	204,088	177,295

Box 10: Exports by waste type 2013-2017 (all waste streams)

Waste type	2013	2014	2015	2016	2017
HIC	21,142	28,086	25,756	20,138	28,532
Inert	49,842	73,426	111,279	182,133	147,060
Hazardous (WDI)	169	789	1,893	1,816	1,702
Total exports	71,153	102,301	138,928	204,088	177,295
Hazardous (HWDI)	4,971	4,134	2,511	9,713	6,486

Likely evolution without the DRLLP PSV 2020

5C14.8 The council will continue with its waste management procedures in the absence of the DRLLP PSV 2020. However, critically, in the absence of the DRLLP PSV 2020, the council will not be meeting national requirements for waste planning authorities to plan for seven waste streams. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of DRLLP PSV 2020 Policies

5C14.9 This section examines the likely significant effects of implementing the proposed DRLLP PSV 2020 policies on SA Objective 14, waste. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the

whole revised Plan on the objective. This review takes account of mitigation already included within the proposed Plan.

5C14.10 The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	Q12 – Refuse/ recycling storage
D2 – Presumption in favour of sustainable development	Q20 – Statutory listed buildings
D3 – Infrastructure	Q22 – Conservation areas
D4 – Planning obligations	Q24 – River Thames
H1 – Maximising housing growth	Q27 – Basements
H11 – Estate regeneration	PN1 – Waterloo and South Bank
ED1 – Offices (B1a)	PN2 – Vauxhall
ED3 - KIBAs	PN3 – Brixton
ED12 – Markets	PN4 – Streatham
ED13 – Visitor attractions, leisure, arts and culture uses	PN5 – Clapham
T5 – River Transport	PN6 – Stockwell
T8 - Servicing	PN7 – West Norwood/Tulse Hill
EN4 – Sustainable design and construction	PN8 – Kennington/Oval
EN7 – Sustainable waste management	PN9 - Herne Hill
	PN10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace

Delivery and monitoring policies D1 – D4

5C14.11 Use of vacant buildings as provided for in policy D1 is an effective way of minimising the production of waste associated with new construction. It results in significant positive effects in terms of reuse and recycling of materials. Policy D4 on planning obligations includes use of funds for provision of infrastructure, and some examples are provided. SA recommendation 84 on the DRLLP was accepted and has been incorporated in the DRLLP PSV. Waste infrastructure has been included in policy D4 as a use of Section 106 planning obligations. This can include innovative waste infrastructure that is multi-functional, for example, waste used to provide heat/energy. It is considered this change has the potential for significant positive effects in achieving SA Objective 14. It is noted that the Infrastructure Delivery Plan identifies the Lambeth's Reuse and Recycling Centre project as not having any progress to date so it is unclear when this might be delivered.

Housing H1, H11

5C14.12 Policy H1 seeks to maximise the supply of additional homes in Lambeth. Draft London Plan policy requires at least 1,335 net additional dwellings per annum and Lambeth policy seeks to exceed this allocation. This will result in increased domestic (and construction) waste and therefore likely to result in negative effects on the objective. However, population growth is expected for the whole of London, and if some of the required housing is not accommodated in Lambeth, it will simply need to be accommodated elsewhere in London. Therefore, it is unlikely there will be any net decrease in regional domestic waste if the level of housing proposed for Lambeth under policy H1 is not delivered. In addition, major developments will need to demonstrate how they meet the Mayor's net zero-waste target through a circular economy statement (as per Local Plan policy EN7 and Draft London Plan waste policies). Accordingly, it is considered that policies are in place to mitigate effects of additional waste caused by increase in house building and occupation and ensure Lambeth manages its waste in a sustainable manner. Estate regeneration schemes should follow ten key design principles for new homes, one of which is 'discrete and convenient storage for waste and recycling'. This is commended. SA recommendation 85 on the DRLLP suggested the addition of a signpost to policy Q12 (c) in clause (e) of policy H11. This was recommended alongside the recommended reference to policy EN4 (SA recommendation 85). Cross-reference to

policy Q12(c) has been included in the DRLLP PSV as this policy clause details specific requirements for waste on estates. This was considered appropriate to signpost in policy H11(e). While the cross-reference to policy Q12(c) was accepted, no change was made to cross reference to policy EN4 as it is considered a borough-wide policy that would be applicable in any circumstance. The response and amendment is noted and considered appropriate to address waste concerns in estate regeneration schemes.

Economic development policies ED1, ED3, ED12, ED13

- 5C14.13 The economic development policies of the DRLLP PSV 2020 seek to stimulate economic growth in the borough. Accordingly, such growth and development will likely produce additional commercial and business-oriented waste. Waste will be generated from day-to-day operations of businesses, but also from initial set-up, especially where new buildings are required. Where possible, existing buildings should be retained and incorporated into the design and refurbishment of new non-residential development (for all major developments and conversions over 500m² floorspace) (BREEAM awards credits for this in their assessments (policy EN4)).
- 5C14.14 Under policy ED1, proposals involving a complete loss of office floorspace will not be permitted unless tests are met, one of which is that there is no demand for the office floorspace, and it would not be feasible and/or viable to refurbish, renew, modernise or redevelop the offices to meet requirements of existing or future occupiers, and it would not be feasible and/or viable to adapt the office floorspace as smaller B1a units. It is considered that indirectly this policy seeks to minimise construction/demolition waste. New development proposals will inevitably generate increased waste, particularly if demolition is involved. Increased tourism, visitors, and markets can increase litter levels and general waste. However, it is considered that the policies on markets (ED12) and visitor attractions (ED13) indirectly recognise waste as a by-product/effect of their operation and seek to manage waste generation, and together with other policies, seek to manage such impacts (e.g. EN7 and T8).
- 5C14.15 Policy ED3 ensures there is land supply for waste management uses within KIBAs. Land within KIBAs is protected for use for business, industrial, storage and waste management uses, including green industries like recycling, refurbishing and repair. The policy therefore should result in positive effects on SA Objective 14 by ensuring an adequate supply of land to meet the future waste management requirements of the borough during the plan period. However, permitted development rights from B8 (storage and distribution) to C3 residential (subject to prior approval) may result in loss of land in KIBA use which may have a detrimental effect /reduce options for sites for future waste management use. All sites in current waste management or transfer use are protected by policy EN7, whether they are within a KIBA or not.

Transport policy T5, T8

- 5C14.16 The Delivery and Servicing Plan required by policy T8 will include information on waste collection services, as will the delivery and servicing plan required for freight-related movement in supporting text 8.44, therefore resulting in positive effects on the objective. Furthermore, additional new supporting text has been added to policy T5 on River Transport to encourage developments in proximity to the Thames to consider utilising the river for the transportation of construction materials and waste.

Environment policies EN4 and EN7

- 5C14.17 The BREEAM standard includes waste management measures as part of their assessment of development proposals where credits are awarded for effective waste

management including reuse and recycled materials. Policy EN4 seeks non-residential developments to achieve BREEAM rating of 'excellent'. Existing waste transfer and management sites are safeguarded under policy EN7. Policy EN7 respects the waste hierarchy, in particular the efficient use of resources, the reuse of materials and resources, composting and the recovery of energy from materials. Overall it is considered that policy EN7 should result in significant positive effects on the achievement of SA Objective 14. Major development sites, referable to the Mayor, will need to demonstrate how they meet the Mayor's net zero-waste target through a Circular Economy Statement. Other developments will be expected to recycle construction, excavation and demolition waste on-site wherever practicable. Construction, demolition and excavation waste should be reused, recycled or recovered and 95% of excavation use should be put to beneficial use. Disposal of such waste in landfill should only take place where it has been demonstrated that alternative, more sustainable fates are not feasible. SA recommendation 86 on the DRLLP has been addressed in the DRLLP PSV and 'exceptional circumstances' has been removed from clause (d) of the policy. It was also noted in the SA response that further suggested changes to the Draft London Plan has introduced new targets for CD&E waste which have also subsequently been incorporated. Policy clause (d) has been amended to update CD&E targets as relevant and supporting text paragraph 9.69 has been amended to reflect this.

- 5C14.18 SA recommendation 87 on the DRLLP was accepted and has resulted in additional text to ensure that where redevelopment of safeguarded waste sites is proposed; *waste capacity is re-provided on-site* or elsewhere in the borough. Paragraph 9.67 has been amended to state that: 'Redevelopment of safeguarded waste sites for other uses will only be supported if compensatory waste capacity is provided elsewhere within the borough 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 the agent of change principle'. This allows for situations where the site is proposed to be redeveloped and the safeguarded waste element/capacity is re-provided within the same site/redevelopment. The additional supporting text added addresses SA recommendation 87, and thus positively contributes to SA Objective 14.

Quality of built environment policies Q12, Q20, Q22, Q24, Q27

- 5C14.19 Policy Q12 is on refuse and recycling storage and provides direction on how such storage should be accommodated on sites. It also provides specific detail on how communal, commercial or large scale refuse stores should be presented. The policy helps meet SA Objective 14 by enabling safe storage of waste and recycling convenient both for users and collectors. It is also considered that the policy positively contributes to other SA Objectives, for example 2 (health), 3 (access and services) 4 (infrastructure) 5 (equalities) and 7 (liveability). The SA on the DRLLP suggested that supporting text could be amended to encourage more sustainable forms of screening of bins, for example hedges/soft landscaping, rather than just brick (SA recommendation 88). No change was made in response to this recommendation. The policy team responded that '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. The policy team have further noted that this matter would be better addressed in a revision of the council's Refuse and Recycling Storage Design Guidance. The response is noted and considered to be satisfactory in addressing SA recommendation 88, provided it is addressed in the Design Guidance document.
- 5C14.20 Local Plan policies seek to sustain and enhance the historic environment, ensure heritage assets are in viable use and discourage development involving demolition in

conservation areas. This has significant positive effects on SA Objective 14 as it significantly reduces the likelihood that designated buildings will be demolished to make way for new buildings, and therefore avoids increased levels of construction waste which forms a large contribution to London's waste production. Therefore, the adaptive re-use and full occupancy of historic buildings has an important relationship with the issue of waste. Basement development will only be supported where no unacceptable impacts will result to waste to landfill (among other things). Policy Q24, clause (b) (v) states that proposals for permanent moorings on the River Thames should have adequate arrangements for waste disposal, thus positively contributing to SA Objective 14 by ensuring that waste is managed and transported in a sustainable manner.

Places and neighbourhoods policies PN1 – PN11

- 5C14.21 The borough will see substantial new residential and mixed-use development in particular centres (for example Waterloo, Vauxhall, Brixton, Streatham) which will give rise to significant quantities of waste during construction and occupation. However, other DRLLP PSV 2020 policies (e.g. EN7, Q12) will also apply to development occurring in these places, as well as other development strategies such as applicable Opportunity Area Frameworks, and SPDs which address waste management and minimisation, for example the Vauxhall, Nine Elms and Battersea Opportunity Area (aka NEV) Framework proposes an anaerobic digestion plant at New Covent Garden market (in Wandsworth Borough), Brixton SPD.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

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

Table 21: Summary assessment of effects of the DRLLP PSV 2020 for waste

Assessment of effects of the DRLLP PSV 2020 on SA objective 14	Score	Justification of Score	Timescale and probability	Permanent or temporary
Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates	+/?	<p>Positively, the Local Plan seeks to bring back into use vacant buildings and protects KIBAs and employment generating <i>sui generis</i> (which includes waste management) sites. However, the DRLLP PSV also promotes significant levels of new development (particularly housing in response to draft London Plan requirements) and this is inevitably going to result in increased levels of waste. It is unclear from the appraisal whether policies will be able to completely mitigate effects of new development. This is addressed through the Draft London Plan waste apportionment. The draft Local Plan identifies and promotes KIBAs as appropriate locations for waste management uses. Importantly the Draft London Plan has undergone its own Integrated Impact Assessment and examination which includes assessment of its policies against sustainable waste objectives.</p> <p>Policy EN7 on waste management and policy Q12 refuse and recycling storage seek to mitigate effects and should result in positive effects with continued downward trends on waste arisings baseline data (i.e. reduction in waste arisings despite population increases).</p> <p>There is also an element of uncertainty on waste operators coming forward and locating in the borough. It is recognised that the DRLLP PSV promotes KIBAs for this use. It is also noted that the Infrastructure Delivery Plan identifies the Lambeth's Reuse and Recycling Centre project as not having any progress to date so it is unclear when this might be delivered.</p> <p>Achievement of higher BREEAM standards should result in more positive effects with regards to waste as these assessment tools contain waste and reuse components/credits.</p>	<p>It is considered that operations to minimise waste, maximise reuse and recycling of waste and increase landfill diversion will be evident in the short term as excellent waste management procedures and facilities are already in operation.</p> <p>Evidence of full achievement of SA objective 14 will unlikely be evident until at least the medium to long-term as the large scale redevelopment of key locations occurs and innovative waste management technologies become established/mainstream.</p>	<p>Temporary effects associated with demolition and construction, however it is considered that these can be managed on-site, and reuse of materials will be encouraged.</p> <p>Growth in the Borough is likely to produce permanent and ongoing effects in waste generation and these will need to be continuously processed, managed and monitored in increasingly innovative ways as technologies develop, particularly towards the end of the Plan period.</p>

Recommendations for monitoring likely uncertain effects

5C14.23 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- New waste capacity (tonnes) by management type (recycling/composting, recovery, transfer and disposal) and type of wastes handled (HIC and CD&E)
- Loss of waste sites to other uses. Location and amount of compensatory capacity
- Waste exports (amount, type of waste and destination)
- Infrastructure Delivery Plan updates

5C15. AIR QUALITY

5C15.1 This section of the SA relates to the sustainability performance of the Revised Lambeth Local Plan Proposed Submission Version against:

Objective 15: To improve air quality.

5C15.2 To achieve this objective, plan policies should improve air quality; reduce emissions of PM10, NO2 and ozone depleting substances; help to achieve national and international standards for air quality (e.g. those set out in the Air Quality Standards Regulations 2010) as well as local air quality management targets; support the planting of trees; and promote the 'transport hierarchy'.

Relevant policy objectivesNational Level

5C15.3 Paragraph 181 of the *National Planning Policy Framework 2019* is on air quality. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of air quality management areas and clean air zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at plan-making stage, too ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.

5C15.4 Paragraph 183 states the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

Regional Level

5C15.4 The *Draft London Plan* contains a number of policies that either directly or indirectly seek to address air quality and natural resources. Policy S11 is on improving air quality. Development proposals should not lead to further deterioration of existing poor air quality or create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, or create unacceptable risk of high levels of exposure to poor air quality. Development proposals must be at least air quality neutral. Design solutions should prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post design or retro-fitted mitigation measures. Developments in Air Quality Focus Areas or that are used by large numbers of people particularly vulnerable to poor air quality, such as children or older people that do not demonstrate design measures have been used to minimise exposure should be refused.

Local Level

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

Baseline conditions and existing issues

- 5C15.6 The whole borough is within an Air Quality Management Area in relation to a breach of nitrogen dioxide (annual mean and hourly mean) and particulate matters (daily mean and annual mean) objectives as specified in the Air Quality Regulations 2000.
- 5C15.7 Road traffic continues to be the primary cause of air pollution in London and in Lambeth the majority of air pollution is caused by road vehicles. The Greater London Authority designates Air Quality Focus Areas in London which are areas that have high levels of pollution and human exposure. In Lambeth, there are five Focus Areas which lie along major transport corridors (A23 from Brixton to Streatham, Kennington Oval/Camberwell New Road (A202)/Kennington Park Road (A3), Vauxhall Cross, Clapham Road (A3), Waterloo Rad). The three major sources of emissions in the borough are from residential and commercial premises (mainly gas boilers) and construction sites (dust and machinery emissions) – with emissions from construction activities noted to be increasing (Lambeth Air Quality Action Plan 2017-2022).

Likely evolution without the revised Plan

- 5C15.8 In the absence of the Revised Lambeth Local Plan Proposed Submission Version the council will need to rely on the provisions in the London Plan and Lambeth Air Quality Action Plan. Given the level of growth assigned to the borough in the London Plan together with road traffic being a primary cause of air pollution; in the absence of the DRLLP PSV growth may occur in a manner that generates more traffic movements. Opportunities to improve local active travel routes may not be realised or maximised. Open spaces and green infrastructure may not be as well protected or improved. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of revised Policies

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

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

D1 – Delivery and monitoring	EN2 – Local food growing and production
D2 – Presumption in favour of sustainable development	EN3 – Decentralised energy
D3 – Infrastructure	EN4 – Sustainable design and construction
D4 – Planning obligations	EN7 – Sustainable waste management
D5 - Enforcement	Q6 – Urban design: public realm
H1 – Maximising housing growth	Q9 - Landscaping
T1 – Sustainable travel	Q10 – Trees
T2 – Walking	Q14 – Development in gardens and amenity spaces
T3 – Cycling	PN1 – Waterloo and South Bank
T4 – Public transport infrastructure	PN2 – Vauxhall
T5 – River transport	PN3 – Brixton
T7 - Parking	PN4 – Streatham
T8 – Servicing	PN5 – Clapham
EN1 – Open space, green infrastructure and biodiversity	PN6 – Stockwell
	PN7 – Kennington/Oval

Delivery and monitoring policies D1 – D5

- 5C15.11 The level of development proposed for the borough is such that it is inevitably going to place increased stresses on air quality. However, effects can be mitigated. Policy D2 reflects the presumption in favour of sustainable development as per the National Planning Policy Framework. Supporting text paragraph 4.8 notes the importance of pre-application discussions in achieving the best outcome and ensuring development aligns with planned infrastructure. Additional text has been included to strengthen reference to the delivery of green infrastructure which is recognised as a positive contributor to air quality. Therefore it is considered that policy D2 will positively contribute to SA Objective 15 to improve air quality. Policy D4 seeks to provide or fund local improvements to mitigate the impact of development and includes transport infrastructure (public transport, walking and cycling network improvements), public realm improvements, green infrastructure and parking restrictions/car clubs/travel plans. Carbon offset requirements have been added to the list of improvements to mitigate the effects of development which will positively contribute to SA Objective 15 to improve air quality as carbon dioxide emissions are a major contributor to poor air quality in the borough. However there is some uncertainty on exactly how much and how often (and if at all) monies collected from development will be used to improve air quality, given the competing demands of funds for other causes.
- 5C15.12 As highlighted previously there is some concern, particularly regarding cumulative impacts on air quality, with the policy approach of policy D5 Enforcement.

Housing policy H1 and ED policies

- 5C15.13 High levels of housing and economic growth will inevitably have an impact on air quality, however it is considered that effects can be mitigated through other policies in the DRLLP PSV (e.g. EN1, EN4) and Draft London Plan (particularly policy S11), provided these are considered during in the early stages of a planning application.

Transport policies T1 – T5, T7, T8

- 5C15.14 Taking into account the level of development proposed for the borough in the Draft London Plan; it is considered that the transport policies should significantly mitigate adverse effects on air quality and on SA Objective 15 as the policies seek to reduce dependence on the private vehicle, maximise trips made by sustainable modes, promote walking and cycling, improve public transport capacity and accessibility and reduce the need to travel. Policy T1 promotes the 'transport hierarchy' with walking and cycling given most priority, and private cars least priority. As highlighted under SA Objective 2 – health and well-being, SA recommendations 17 on including the word 'healthier' in policy T2(a) and adding 'air quality' to policy T3(b) were further endorsed with respect to SA Objective 15 in the DRLLP and have been accepted and amended in the DRLLP PSV. Analysis set out in SA paragraph 5C2.35-2.38 also applies with regards to air quality SA objective 15. Maximising use of the River Thames is also encouraged in terms of SA Objective 15 and policy T5 is supported. Policy T7 on parking significantly limits new car parking provision in the borough and supports electric vehicle charging points, which seeks to support policy T1 on promoting the transport hierarchy and reducing reliance on the private car, and therefore seeks to mitigate adverse effects on air quality. SA recommendation 89 sought clarification on whether clause T8(j) of the DRLLP applied to any electric vehicle to use (perhaps outside of business hours), or just service vehicles? It was 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. The policy response was that ‘these charge points would be located in loading bays, and would therefore be available to other users outside of the prescribed loading hours’ and no change was made to policy T8.

Environment and open space policies EN1 – EN4 and EN7

5C15.15 The DRLLP PSV 2020 clearly states that Lambeth will apply Draft London Plan policy SI1 Improving air quality to all development proposals in the borough, along with associated Mayoral guidance on Air Quality Neutral and Air Quality Positive standards and on ways to reduce construction and demolition impacts. The policy states development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures. It is considered that alongside Draft London Plan policy SI1, the implementation of Draft London Plan and Local Plan policies on sustainable transport, open space and green infrastructure, energy, sustainable design and construction and waste should result in improved air quality particularly when taking into account the level of growth proposed in the borough over the plan period. SA recommendation 90 was accepted and has been incorporated into the DRLLP PSV. Paragraph 9.6 has been amended to note the air quality benefits that green infrastructure can offer. This addition, combined with other EN1 supporting text which recognises the improved air quality benefits that open space, urban greening in new developments and living roofs and walls provides, as well as policies EN2, EN3, EN4 and EN7, is considered to positively contribute to SA Objective 15.

Quality of built environment policies Q6, Q7, Q9 – Q11, Q14

5C15.16 Quality of built environment policies in the DRLLP PSV have been significantly strengthened (compared to the DRLLP 2018) in terms of designing for climate change mitigation and adaptation and secondary effects of such measures will also result in improved air quality. The cumulative impact of these policy amendments in the reduction of greenhouse gases and the adaptation to climate change through, for example increased canopy cover, will indirectly result in improvements to local air quality. It is also considered these policies help protect certain equality protected groups, for example age, disability and those with certain health conditions.

5C15.17 New or enhanced open space/landscaping/trees, pedestrian and cycle-priority environments (policy Q6), retention and enhancement of existing planting and landscape features, green infrastructure, green and brown roofs (policy Q9), trees policy (Q10), and controlling development in gardens and amenity spaces (Q14) all indirectly contribute to improved air quality. Supporting text para 10.37 under policy Q9 landscaping is commended ‘...creation of a range of planting types which might mitigate against poor air quality...’. SA recommendation 90 on the DRLLP was accepted and has been incorporated in the DRLLP PSV. Supporting text paragraph 10.43 now makes reference to Air Quality Focus Areas where 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. This will likely result in an improvement to air quality in these areas.

5C15.17 SA recommendations 92 and 93 on the DRLLP were also accepted and have been incorporated in the DRLLP PSV. ‘Trees of values’ has now been defined in the glossary and it includes reference to air quality. Supporting text to policy Q14 now states that landscape design should optimise the opportunities to improve air quality. Both these amendments are commended and will result in positive effects on SA Objective 15.

Places and neighbourhoods policies PN1 – PN11

- 5C15.18 The whole borough is designated an air quality management area. SA recommendation 94 on the DRLLP was accepted and has been incorporated in the DRLLP PSV. The places and neighbourhoods policies in the DRLLP PSV 2020 have been reviewed and updated to ensure appropriate reference to improving air quality in both the policy and supporting text for each place. Where relevant in each centre, the supporting text identifies an air quality focus area and specific priority for improving air quality through various measures. Given the borough's focus on improving air quality, this is deemed appropriate and satisfactory in achieving SA Objective 15.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

- 5C15.19 Overall, and taking into account the criteria outlined in the Sustainability Framework, projected population growth, and the housing targets assigned in the Draft London Plan to be delivered in Lambeth and economic growth; it is considered that the DRLLP PSV 2020 policies, together with Draft London Plan policies, do seek to improve air quality.

Table 22: Summary assessment of effects of DRLLP PSV on air quality

Assessment of effects of the DRLLP PSV 2020 on SA objective 15	Score	Justification of Score	Timescale and probability	Permanent or temporary
To improve air quality	?/+	<p>Much development and growth is proposed for the borough during the plan period. This inevitably is going to place additional pressures on natural resources, including air quality. It is considered that the policies (Draft London Plan and DRLLP PSV) seek to mitigate these effects for improved air quality, for example, by reducing the need to travel; discouraging private vehicle use; encouraging more walking and cycling and use of improved public transport; incorporating design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post design or retro-fitted mitigation measures; application of the urban green factor, provision for living roofs and walls and other green infrastructure; protection of existing trees and open space and; planting of new trees and greenery. However it is unclear whether effects can be mitigated completely or whether air quality will be improved significantly given recent and current attempts and current baseline conditions. Draft London Plan air quality policy sets out a robust approach to reducing air pollution, but delivery and achievement of the air quality neutral and positive approach is uncertain, particularly given it's a new policy approach for developers and also recognising that often, proposals are not built to how they are designed in terms of achieving sustainability (including air quality) standards set out in the design. Crucially, improvement in air quality must be integrated into the design process right at the beginning of the design process rather than an 'add on' at the end in an attempt to mitigate effects. Accordingly, this step-change in approach to design, and the degree of rigour to which air quality is applied at planning application stage, may be uncertain (particularly the level of improvement in air quality), at least in the short-medium term.</p> <p>Much development is proposed in existing town centres and around public transport nodes and this has positive effects for the objective through good accessibility to public transport and reduced need for private vehicle use. There is a significant push to improve green infrastructure in the borough, and coupled with lower car ownership in Lambeth and more electric vehicle use; it is considered that positive effects are possible for air quality.</p> <p>Much needed improvements to some public transport infrastructure remain uncertain due to identified funding gaps (for example a new station at Brixton and for the London Overground). The northern line extension has not been delivered before occupation of sites in the Nine Elms Vauxhall Opportunity Area (delivery expected 2020). There is also current funding gap for the Healthy Route Network project to improve walking and cycling borough-wide. It is also noted that no funding has yet been secured for the Low Emission Neighbourhoods project to improve Air Quality and monitoring in Air Quality Focus Areas and around</p>	<p>Public transport infrastructure projects (e.g. the new station at Brixton) is unlikely to be delivered (if at all) until in the mid to long-term at the earliest and for some projects is dependent on securing funding.</p> <p>Efficient management of air quality in the borough, given the projected population increase and level of development proposed necessitates the delivery of clean and efficient and reliable public transport and active travel routes.</p> <p>Measures to help improve localised air quality such as increased greenery will likely be evident in the medium term as developments are completed and soft landscaping, tree planting and living roofs / walls become established.</p> <p>Improvements of the Vauxhall gyratory which currently has poor air quality are likely to be evident in the short term (delivered by 2022).</p>	<p>Permanent.</p> <p>Temporary adverse air quality effects associated with heavy vehicle movements and dust may be likely in the short and medium terms as developments are constructed. However such effects will be addressed in the Construction Logistics Plan required by policy T7 Servicing.</p>

	<p>sensitive receptors. Also, despite the whole borough being a designated Air Quality Management Area and previous efforts implementing the Air Quality Action Plan, there has not been a significant decrease in roadside and kerbside levels of Nitrogen Dioxide.</p> <p>However, on the whole, to the extent that local planning policy can influence, it is considered that DRLLP PSV policies do seek to improve air quality as much as practicable. Implementation of other measures outside of local plan process, such as implementation of ultra-low emission zones and vehicle type and fuel choice will also contribute to reducing air pollution and improving air quality.</p>		
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Recommendations for monitoring likely uncertain effects

5C15.20 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Percentage of residents with health problems related to air pollution/quality
- Improvement of air quality at the monitoring stations around the Borough
- Infrastructure Delivery Plan updates
- Number of major application approvals that meet or exceed the London Plan Urban Greening Factor target score
- Amount of open space lost through completed planning permissions
- Change in areas of biodiversity importance
- The proportion of schemes achieving policy requirements relating to carbon dioxide emission reductions
- Modal share – walking, cycling and public transport

5C16. EDUCATION AND SKILLS

5C16.1 This section of the SA relates to the sustainability performance of the DRLLP PSV 2020 against:

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

5C16.2 To achieve objective 16 plan policies should improve opportunities and facilities for formal, informal and vocational learning (including volunteering) for all ages; contribute to up-skilling and to meeting skills shortages; promote healthy, sustainable living; and provide people with the skills to find work.

Relevant Policy ObjectivesNational Level

5C16.3 Paragraph 94 of the *National Planning Policy Framework 2019* states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.

Regional Level

5C16.4 Policy E11 Skills and opportunities for all in the Draft *London Plan* sets out the Mayors aim to co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners. It also states that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through section 106 obligations. Policy S3 on education and childcare facilities also seeks to provide for higher education, and further education. There are also a number of other Draft London Plan policies that indirectly seek to maximise education and skills level of the population – for example affordable workspace, waste, construction related jobs in relation to delivering homes Londoners need, sector growth opportunities and clusters).

Local Level

5C16.5 Lambeth's Employment and Skills SPD 2018 sets out the council's approach to securing appropriate contributions through Section 106 agreements towards employment and skills initiatives.

5C16.6 Lambeth's "Investment and Opportunity Strategy" summarises the key priorities emerging from a local economic assessment (2015). It identifies improving skills as key to tackling increasing inequalities in the local population and ensuring the continued delivery of economic growth. Under Priority Two: Develop skills provision to meet employer needs, one of the key outcomes is to: "raise the quality, quantity and profile of vocational provision in Lambeth", and ensuring that skills provision is "employer-led, reflecting local priorities and skills needs". Under Priority 3: Equip young people for the economy of the future, the strategy sets out an aim to: "significantly increase employer engagement, facilitating relationships with schools and training providers".

Baseline conditions and existing issues

5C16.6 Lambeth has five nursery schools, 62 primary schools and 17 secondary schools. There are also five special schools, two pupil referral units and five colleges. There has been a significant expansion programme of schools in Lambeth to meet

increased needs for school places. There was a 19 per cent increase in demand for Reception places in Lambeth schools between 2009 and 2014 and Lambeth responded by adding over 500 permanent Reception places as well as over 800 temporary expansion places into schools. Lambeth built, refurbished and redeveloped schools across the borough to account for the fast-growing resident population and to meet the needs of pupils and the wider community. Overall 2,300 primary places were added during that time, the equivalent of one 1-form-entry and five 2-form-entry schools. More places are still being added as these expansions proceed through the year groups in some areas. Planned additional primary places are proposed to be added in 2021 to Wyvil Primary School in Vauxhall and Sudbourne Primary School in Brixton. Lambeth has also seen significant expansion of places in recent years for secondary provision. Four new academies and free schools were created between 2012 and 2014 adding 2,725 secondary places in Years 7-11. Since then two schools have permanently expanded and Woodmansterne opened a 5 form entry secondary department to become an all-through school. They opened to full capacity in September 2019. Durand Academy closed its secondary department in September 2018 bringing the total Year 7 places to 2,643 in 2019. In addition, 450 additional sixth form places and 165 additional Special Education Needs and Disabilities (SEND) places have been created.

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

- 5C16.10 The jobs being created in London are increasingly requiring higher levels of skills, placing an ever greater emphasis on the need for high levels of qualifications amongst Lambeth residents. High competition for jobs makes it particularly difficult for residents with low or no qualifications to find work. The Lambeth Growth Strategy Evidence base (2015) concludes that: “it is very clear that future employment opportunities will be overwhelmingly in high skilled occupations”, and therefore: “supporting residents in deprived areas to attain better qualifications so that they can access these opportunities must be a key priority for the Council” (Employment and Skills SPD 2018).

Likely evolution without the DRLLP PSV 2020

- 5C16.11 Education facilities will continue to be provided in the absence of the DRLLP PSV 2020. However, they may not be located in the best areas from a spatial planning perspective, although it is noted that London Plan policy S3B will apply.

Assessment of draft revised Policies

- 5C16.12 This section examines the likely significant effects of implementing the proposed DRLLP PSV 2020 policies on SA Objective 16, education and skills. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole revised Plan on the objective. This review takes account of mitigation already included within the proposed Plan.

- 5C16.13 The following policies have been screened as having potential for significant effects on this objective.

D1 – Delivery and monitoring	PN1 – Waterloo and South Bank
D2 – Presumption in favour of sustainable development	PN2 – Vauxhall
D3 – Infrastructure	PN3 – Brixton
D4 – Planning obligations	PN4 – Streatham
H7 – Student housing	PN5 – Clapham
ED15 – Employment and training	PN6 – Stockwell
S11 – Safeguarding existing social infrastructure	PN7 – West Norwood/Tulse Hill
S12 – New or improved social infrastructure	PN8 – Kennington/Oval
S13 – Schools	PN9 – Herne Hill
EN2 – Local food growing and production	PN 10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace

Delivery and monitoring policies

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

Housing policy H7

- 5C16.15 The loss of existing student accommodation in the borough is resisted through policy H7, unless it is demonstrated that that facility no longer caters for future or current needs and the floorspace is replaced by another form of residential accommodation. In line with Draft London Plan policy, the approach to policy H7 is that the demands for student housing does not compromise capacity to meet the need for conventional housing, especially affordable family housing, or undermine policy to secure mixed and balanced communities. Proposals should also not result in loss of employment

land or floorspace. Student housing should form part of mixed use developments, and be linked to a higher education provider. Overall, it is considered that the policy provides for student housing, delivered in a sustainable manner (close to amenities, transport and is affordable), promotes healthy sustainable living, and improves opportunities and facilities for formal learning. However, it is noted that the DRLLP PSV contains strong provisions for the delivery of conventional dwellings and employment generating land/floorspace, and therefore difficulties in identifying appropriate sites for student housing may arise. Supporting text states that anticipated growth in numbers of full time higher education students is expected. While existing student accommodation will be protected, it is uncertain whether Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 policies taken as a whole will positively meet future demand.

Economic Development policy ED15, ED2

- 5C16.16 The level of development proposed for the borough provides opportunities for jobs and apprenticeships in construction and ancillary sectors. Policy ED15 states that the 'council will support employment and training schemes to maximise local employment opportunities and help address skills deficits in the local population'. Applications for major development must include a site-specific Employment and Skills Plan that will set out a minimum 25% of all jobs created by the development (in both the construction phase and for the first two years of end-use occupation) to be secured by the council for local residents; and developers to engage with local schools, colleges and/or community organisations to promote the range of careers available and the skills and qualifications needed for employment in the construction and commercial sectors. Financial contributions will also be sought to support those sections of the Lambeth workforce that are furthest from employment, having been out of work for a long period of time and/or having low levels of skills. The financial contributions will be used by the council to fund local training and support services to enable access to newly created employment opportunities arising from development. Supporting text states that 'Securing obligations for employment training of local people will help to ensure that local residents are given access to the right skills training' to enable them to take advantage of opportunities created by new development, thus contributing towards SA Objective 16 by maximising the education and skills levels of the population. Policy ED15 seeks to maximise such opportunities, reduce unemployment and provide training schemes to up-skill the population, targeting young people and the long-term unemployed, which, if implemented effectively, should result in significant positive effects for local residents, and the attainment of SA Objective 16.

- 5C16.17 The affordable workspace policy should also result in positive effects on SA Objective 16. Affordable workspace may help support educational outcomes, for example by businesses providing apprenticeships and work experience, offering mentoring by entrepreneurs and/or providing space for further and higher education leavers to develop academic work into businesses. It may also be linked with business support and skills training (Draft London Plan).

Social infrastructure policies S1 – S3

- 5C16.17 Policies S1, S2, and S3 should result in significant positive effects on SA Objective 16 as they seek to maintain an adequate supply of land for education and community uses. Policy S2 provides for new or improved premises and this will help maximise the education and skills levels of the population through higher and further education, childcare, worship, health care, affordable meeting space and other community uses. These premises will need to be delivered in a sustainable manner, including being accessible to the community, not result in adverse impacts (hours of operation, noise, traffic etc.), and accommodate shared use of premises where possible. Schemes of

more than 25 residential units will also need to provide appropriate provision for social infrastructure where this cannot be met through existing facilities.

- 5C16.18 Policy S3 supports proposals for new primary and secondary schools, or the extension or expansion of existing schools, including for nursery, sixth form and Special Educational Needs (SEN) places. Proposals involving the loss of land in use, or previously in use, by a state-funded school will not normally be supported unless specific conditions are met. Schools are the foundation for maximising the education and skill levels of the population and this policy is therefore considered to result in significant positive effects on SA Objective 16.

Open space and environment policy EN2

- 5C16.18 Policy EN2 on food growing provides opportunities for informal learning and volunteering for all ages. It also provides opportunities to learn about the benefits of healthy lifestyles, and offers opportunity for social interactions, all of which contribute to achieving SA Objective 16. Allowing food growing on non-residential schemes results in more positive effects for the objective (as well as other SA Objectives such as 2 (health), 3 (access to services), 7 (liveability)).

Places and neighbourhoods policies PN1 – PN11

- 5C16.19 Many of the places provided for in these policies, particularly Waterloo and South Bank, Vauxhall, Brixton, Streatham and West Norwood promote significant levels of development, including creative enterprise zones, and accordingly provide opportunities for new job creation, both during and after construction.
- 5C16.20 Policy PN1 Waterloo and South Bank supports sustainable development for jobs (in line with Draft London Plan targets), while policy PN2 Vauxhall seeks to create jobs in the construction industry through the delivery of high density development. Supporting text for Brixton notes the location as a ‘major administrative and employment centre which supports jobs created by the public, retail and entertainment sectors’, and although the policy does not specifically reference job creation, it does support applications within the Creative Enterprise Zone that provide a mix of workspace typologies for varying businesses with a focus on start-up, incubator and grow-on space for creative and digital industries. This is considered to result in a positive impact on SA Objective 16. Streatham is identified as having a growing economy with lower than average office rental and vacancy rates. Policy PN4 Streatham supports development which enhances the town centre by bringing forward new offices and workspaces for creative and digital industries as well as the regeneration of the former Streatham Hill theatre to include workspace for creative and cultural industries. It also identifies Gleneldon Mews as an important source location for light industrial uses and small businesses. Clapham is identified as a key area for leisure and hospitality activity, supporting many jobs. The supporting text also identifies studio and maker space workspaces and some flexible co-working and managed workspace with aspirations to provide additional spaces for creative and digital industries.
- 5C16.21 Policies PN6 Stockwell and PN7 West Norwood/Tulse Hill positively contribute towards SA Objective 16 through both policy and supporting text. PN6 seeks to encourage commercial, civic and other employment uses in Stockwell, particularly small business space suitable for creative and digital industries. While PN7 directs development and investment towards five focal areas, three of which are appropriate for maximising education and skills; West Norwood Central Retail Area which seeks to provide flexible workspace for opportunities in creative and digital industries; West Norwood Commercial Area which states that development should provide flexible business premises and a variety of employment uses with the council seeking

opportunities to work in partnership with existing landowners to diversify the employment offer; and Norwood High Street, part of which will be designated as a Creative Business Cluster, through the development and renewal of spaces appropriate for creative and digital industries to encourage a range of businesses.

- 5C16.22 Policy PN8 Kennington/Oval is supported as an important residential and employment area. Policy PN9 Herne Hill supports to growth of the creative and digital industries in the Brixton Creative Enterprise Zone.
- 5C16.23 Policy PN 10 Loughborough Junction seeks to encourage new employment uses in the area, as well as supporting proposals that enhance the growth of the creative and digital industries, as does policy PN11 Upper Norwood/Crystal Palace.
- 5C16.24 Implementation of policy ED15 will help ensure that such opportunities, especially those related to construction, are available to local residents, and provide positive prospects for up-skilling, apprenticeships and local employment.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

5C16.20 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is possible that the DRLLP PSV 2020 could have positive effects (albeit with an element of uncertainty) on the improving the existing baseline (to the extent possible by Planning) of education and skills levels of the population.

Table 23: Summary assessment of effects of the DRLLP PSV 2020 on education and skills

Assessment of the effects of the DRLLP PSV 2020 n on SA objective 16	Score	Justification of Score	Timescale and probability	Permanent or temporary
To maximise the education and skills levels of the population	+	<p>In so far as planning policy is able to influence education and skills levels; it is considered that overall the DRLLP PSV will result in positive effects on SA objective 16. Employment and training policy ED15 should help maximise the number of local people working on development / construction sites and end-use occupation during the plan period.</p> <p>Positively, existing schools and community facilities will be safeguarded. Also some town centres, and economic development policies make provision for the establishment of creative enterprise zones, and more creative and cultural industries as well as affordable workspace thereby increasing the likelihood local people can find local work.</p> <p>Local food growing areas can facilitate informal learning for all ages and promote healthy sustainable living.</p>	<p>Existing schools and community uses are already safeguarded.</p> <p>As the population grows in response to completed developments there may be increased strain on school places. In the longer term, as funding is identified it is hoped that additional school places will be delivered to support increased demand.</p> <p>Up-skilling and apprenticeships will be evident in the short term and throughout the plan period as development is constructed and delivered and occupied.</p>	<p>Permanent and temporary</p> <p>While apprenticeships and jobs associated with construction of new development may be temporary (up to occupancy of developments); skills learnt during this time will be transferable to other areas / employment opportunities.</p> <p>Expansion of existing schools is only a temporary measure to resolve school place demand.</p>

5C17&19. LOCAL ECONOMY AND TACKLING WORKLESSNESS

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

Relevant Policy ObjectivesNational Level

- 5C17.4 Section 6 of the *National Planning Policy Framework 2019* is on building a strong, competitive economy. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Regional Level

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

transport, infrastructure, innovation and skills, and enterprise and entrepreneurship;

- **Supporting London's sectors** through advanced urban services, cultural and creative industries, financial and business services, life sciences, low carbon and environmental goods and services, tech and digital, and tourism; and
- **Delivering the Mayor's vision** through strengthening partnerships, making the case for devolution, and leading by example.

Baseline conditions and existing issues

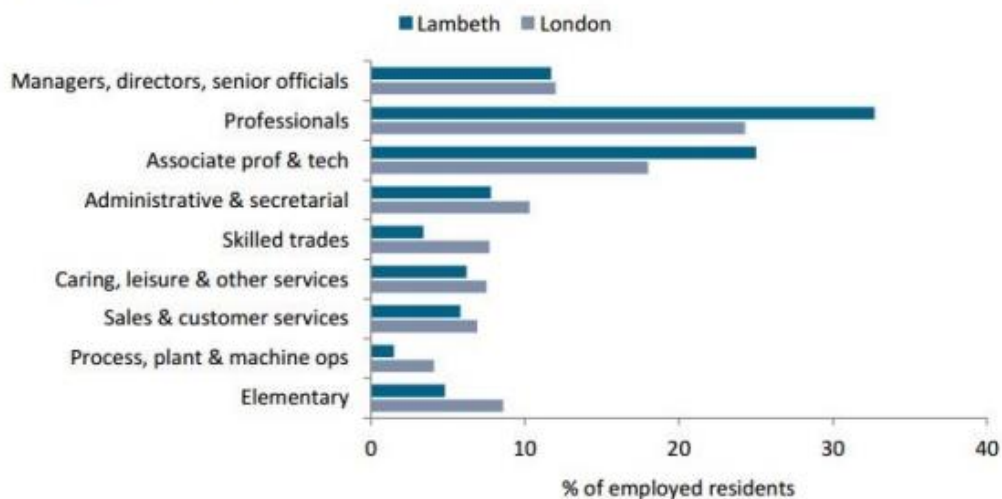
- 5C17.7 The UK economy has grown for eleven consecutive quarters up to Q3 2015, and shrunk in only two of the last twenty-five quarters since the recession of 2008-9. UK labour market performance remains mixed, as illustrated by real pay decreases, high levels of youth unemployment and an increase in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

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

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

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

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



Source: ONS APS

- 5C17.17 Lambeth's creative and digital industries sector provide 22,000 jobs and generate £1.8 billion for the economy. This sector includes businesses in design and fashion, crafts, creative tech, games, publishing, film and TV and advertising. They provide significant support and fuel growth in other parts of the economy, such as the visitor and night-time economy, which is one of the borough's strengths (Lambeth Creative and Digital Industry Strategy 2018).
- 5C17.18 The business base in Lambeth is comparatively small but the number of new businesses being created in the borough has increased significantly, with 1,445 small business enterprises in the borough. Following the national trend, self-employment and part-time working have both increased in Lambeth and 35,000 Lambeth residents are estimated to be self-employed (Lambeth Investment and Opportunity Strategy 2015).
- 5C17.19 Lambeth's 30 Key Industrial and Business Areas represent the borough's strategic stock of land for business use. They are well-occupied and provide land for lower

value uses, support functions and the growing low-carbon economy (including waste management), as well as growth sectors such as the creative and digital industries and food preparation and distribution (KIBA Review 2018).

Likely evolution without the DRLLP PSV 2020

5C17.20 It is important that the Borough protects land used for employment uses. The provisions of the Lambeth Local Plan 2015 provide this protection however; in the absence of the DRLLP PSV 2020 the adopted Local Plan will be considered out-of-date by 2020, although it is recognised that London Plan policies on the protection of employment and industrial land would apply. If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of Policies

5C17.21 This section examines the likely significant effects of implementing the proposed DRLLP PSV 2020 policies on SA Objectives 17 and 19, local economy and tackling worklessness. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the proposed Plan.

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

D1 – Delivery and monitoring	accommodation
D2 – Presumption in favour of sustainable development	ED15 – Employment and training
D3 – Infrastructure	SI2 – New or improved social infrastructure**
D4 – Planning obligations	T1 – Sustainable travel
H1 – Maximising housing growth**	T2 – Walking
H2 – Affordable housing*	T3 – Cycling
H7 – Student housing**	T4 – Public transport infrastructure*
H9 – Hostels and houses in multiple occupation*	T5 – River transport*
H10 – Gypsy and traveller needs*	T8 – Servicing*
ED1 – Offices (B1a)	T9 – Minicabs, taxis, private hire and ride hail services*
ED2 – Affordable workspace	T10 – Digital connectivity infrastructure
ED3 – KIBAs	EN3 – Decentralised energy
ED4 – Non-designated industrial sites	EN4 – Sustainable design and construction*
ED5 – Work-live development	Q9 - Landscaping
ED6 – Railway arches	Q17 – Advertisements and signage*
ED7 – Town centres	PN1 – Waterloo and South Bank
ED8 – Evening and food and drink uses	PN2 – Vauxhall
ED9 – Public Houses	PN3 – Brixton
ED10 – A2 uses, betting shops and payday loan shops*	PN4 – Streatham
ED11 - Local centres and dispersed local shops*	PN5 – Clapham
ED12 - Markets	PN6 – Stockwell
ED13 – Visitor attractions, leisure, arts and cultural uses	PN7 – West Norwood/Tulse Hill
ED14 – Hotels and other visitor	PN8 – Kennington/Oval
* SA 17 only	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace
	** SA 19 only

Delivery and monitoring policies D1 – D4

5C17.23 It is considered that policies D1 – D4 should result in significant positive effects on the local economy and tackling worklessness. In particular, Policy D1 seeks to support initiatives such as town centre partnerships, Business Improvement Districts

and other business networks and business-led or neighbourhood management schemes in order to promote centres, attract inward investment and public realm improvements. Site specific planning obligations and the Community Infrastructure Levy (CIL) will be applied to developments to help deliver necessary infrastructure, including education, health, libraries, sport and leisure, cultural and community provision. Planning obligations should also be sought (among other things) to provide access to employment opportunities created by the development by securing employment premises and learning and skills initiatives, as well as affordable workspace and retail units and low carbon and renewable energy which will positively contribute to SA Objective 17 by creating business growth in a strong and dynamic local economy while also supporting the development of a low carbon economy. It will also contribute to positive effects on SA Objective 19 by increasing the amount of an access to employment generating activities. Such infrastructure is necessary for the ongoing successful and sustainable future of new development, however the levy rate (£s per square metre) needs to be fair and carefully formulated to ensure new development continues and remains viable to developers.

Housing policies H1, H2, H7, H9, H10

5C17.24 The level of housing proposed for the Borough will help improve the local economy, by increasing the opportunity for the provision of local employment (e.g. construction) and training, as well as increased spend from additional households. It is considered that Policy H2 affordable housing should result in positive effects in terms of achieving SA Objective 17, particularly in terms of accommodating low income workers. The policy seeks to offer genuinely affordable housing to Lambeth residents (70 per cent of affordable housing provision to be low cost rented homes and 30 per cent intermediate products, including London Living Rent and London Shared Ownership). Supporting text sets out the council's commitment in ensuring genuine affordability. Policies H9 and H10 will likely result in positive effects on SA Objective 17 by providing hostel accommodation, houses in multiple occupation and safeguarding the existing gypsy and traveller site. Persons in these accommodation and communities are likely to access goods and services provided in the immediate local area, thus contributing to the local economy. It is also considered the student housing policy indirectly contributes to tackling worklessness by providing affordable accommodation for people studying. Provision of housing may also enable people to live closer to their places of work which could help secure the supply of labour, reducing the time lost to travel, increasing productivity and supporting the economy. Similarly, policy H1 maximising housing growth is likely to positively contribute to SA Objective 19 for some people by increasing the amount of and access to employment generating activities through the construction and delivery of additional homes in the borough.

Economic development and town centre policies ED1 – ED15

5C17.25 Policies ED1, ED2, ED3 and ED4 should result in significant positive effects for the local economy and tackling worklessness. The policies seek to maintain a stock of business and employment generating land in the borough, to help ensure local people have access to local jobs, employment and professional development. Protecting existing employment land in strategic areas will likely attract new enterprises to the Borough and will serve as a platform for future employment and economic growth. KIBAs are Lambeth's 'Locally Significant Industrial Sites' and policy ED3 takes a strong position on protecting KIBAs for business, industrial, storage and waste management uses, including green industries and other compatible industrial and commercial uses. The DRLLP PSV 2020 limits the use of KIBA land for co-location with residential and other uses to just three sites in the borough: Montford Place, Knollys Yard and Waterworks Road which have the unique characteristics to support both uses. The intention is to ensure there is enough land

designated for business use. It is considered this policy approach will result in positive effects on the achievement of SA Objectives 17 and 19.

- 5C17.26 Policy ED2 provides good provision for affordable workspace in the borough. It is considered that the policy will help encourage business start-ups and support the growth of business because affordable workspace needs to be provided for a period of at least 15 years (25 years in Brixton Creative Enterprise Zone). As a result of SA recommendation 95 on the DRLLP further clarification has been included in policy ED2 DRLLP PSV. A new policy clause (d) has been added to read: 'The affordable workspace should be made available for occupation at the same time as the rest of the B1 floorspace in the development'. It was noted that given the phasing of development that is common in mixed use development, it is not felt appropriate to require affordable workspace to be 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. The response and amendment is noted and is considered appropriate to address SA recommendation 95. Likewise, ED1 has been amended to reflect this stating 'where appropriate to the scheme, the phasing of delivery of different uses within mixed-use schemes may be secured by planning obligation'. It is also noted that Draft London Plan policy E3F states that affordable workspace elements of a mixed development scheme should be operational, or have agreed finalised terms, prior to residential elements being occupied. Similarly, Draft London Plan policy E7E states the intensified industrial, storage and distribution uses are to be completed in advance of any residential component being occupied. Overall it is considered that policy ED2 affordable workspace will result in significant positive effects on SA Objectives 17 and 19, particularly in encouraging business start-ups; supporting growth of businesses; improving accessibility and opportunity to employment, especially for local people and BAME groups; improving the resilience of business and the economy; and supporting employment opportunities in the most deprived areas and groups and stimulating regeneration, for example Brixton Creative Zone.
- 5C17.27 An Article 4 direction has been in place since 15 September 2017 removing permitted development rights for change of use from B1a office to C3 residential in Brixton town centre, part of Clapham and ten Key Industrial and Business Areas (in whole or part). The council also introduced a second Article 4 direction to continue to remove permitted development rights for change of use from B1a office to C3 residential in the whole of the London Central Activities Zone as it relates to Lambeth on 31 May 2019. This, coupled with the strong policy approach of policies ED1, ED3 and ED4 should result in significant positive effects on the achievement of SA Objectives 17 and 19.
- 5C17.28 Policy ED5 recognises that combined work-live units contribute to the range of homes and the range of business premises in the borough and can offer a number of benefits including reduction in traffic, more efficient use of land, minimising business start-up costs and supporting flexible working; and it is anticipated that significant positive effects on objectives 17 and 19 should result.
- 5C17.29 Policy ED6 use of railway arches creates opportunities for ingenious use of land and may attract new business growth in particular sectors appropriate to the unique environment, for example in the creative and cultural industries and micro-breweries.
- 5C17.30 Policies ED7 and ED11 will likely result in significant positive effects on SA Objectives 17 and 19. The policies seek to ensure town and local centres are lively

and viable places for both consumers and business investors. The Waterloo CAZ retail cluster and retail function of primary shopping areas in major and district centres will be maintained, and active frontages at ground floor level will be encouraged and protected. Local shops, market areas, areas of specialist shopping and local services to meet community needs are protected through policy ED7 and will help to support local business and diversification, as well as improve accessibility and opportunity to employment for local people including BAME groups. Creating and delivering attractive and active town centres will help attract more inward investment to such centres and the wider borough.

- 5C17.31 The drive to maintain retail provision is strong. Primary shopping areas are identified for each town centre, and in these areas retail provision (A1) is encouraged and protected. Proportions of desired retail units are specified for each town centre in the places and neighbourhoods policies, recognising that the blanket approach to town centres is not appropriate. Ensuring adequate retail provision (A1) in primary shopping areas and local centres is considered important for economic and social reasons. On the whole, and taking into account the ratio of primary shopping area within total town centre boundaries as illustrated on the Policies Map, and the social benefits of successful town centres with good proportions of retail offer; it is considered that policies ED7 and ED11 should result in positive effects on the local economy and the tackling of worklessness. However, there is some uncertainty to the future success of traditional high streets. The prevalence of online shopping, together with increased rents and business rates, economic ramifications of Brexit continuing to cause a crisis of confidence in people's spending, and some retailers suffering from outdated USPs, is having/may have an adverse effect on some high streets and/or retailers. Retailers will increasingly need to offer customers something they can't find online, and make shopping a more social and personal experience. Some experts believe town centres should be investing in community and leisure centres to draw people back to the high street. While this may result in less traditional shops in future, its likely to result in more places for people to socialise and thus, bring people back to town centres. Policy ED7 recognises this by encouraging new residential development on appropriate sites as part of a wide mix of town centre uses. High streets are increasingly becoming a social hub, where people go to catch up rather than shop (Dr Hart, University of Loughborough).
- 5C17.32 It is considered that the policies (ED7 and ED11) significantly contribute to liveability and a prosperous local economy, particularly to provide local residents with daily needs and services. Provision of residential above ground floor and on appropriate sites will likely help support local shops and services and therefore positively contributes to SA Objective 17, while town and local centres and their retail offerings will provide access to employment generating activities and the opportunity for well-located employment, thus positively supporting SA Objective 19.
- 5C17.33 Policy ED8 on evening economy and food and drink uses supports such use in town centres and the CAZ retail clusters. The policy seeks to manage adverse impacts on local amenity arising from these uses. Like A1 retail, desired proportions of A3/A4/A5 uses have been established for each town centre, rather than a blanket approach. It is considered that this town/local centre approach is much more appropriate to the needs to each centre and therefore will more likely result in significant positive effects on SA Objective 17. Evening economy and food and drink uses also provide key employment opportunities, thus increasing employment generating activities and positively contributing to SA Objective 19.
- 5C17.34 Policy ED9 seeks to retain public houses, recognising their economic role contributing to employment generation (SA Objective 19) and the local economy and

vitality of the area (SA Objective 17). Changes of use, redevelopment and/or demolition of a public house would only be permissible if certain criteria were met/considered (for example, marketing, economic value to local community).

- 5C17.35 Policy ED10 seeks to avoid A2 uses, betting shops and payday loan shops dominating centres. The outcome of this will likely be more diverse town centres of enhanced vitality and commercial viability that attract more inward investment and new businesses to local areas, including both larger high street chains and smaller individual shops and boutiques. It is considered that this policy significantly seeks to improve, in a positive way, the social and environmental performance of business. However, there remains some level of uncertainty given the prevalence of online shopping and its effect on high street shopping. While it is noted that policy ED10 will likely result in positive effects for Lambeth in regards to limiting A2 uses, betting shops and payday loan shops it is acknowledged that this may, in some cases, result in displacement of demand and impacts on neighbouring boroughs. This can be acknowledged in the Statements of Common Ground with neighbouring boroughs.
- 5C17.36 Policies ED13 and 14 recognise the contribution of visitors and cultural uses to the local economy. These policies also enable improved access to employment generating activities for local residents, thereby contributing to worklessness in the borough and should result in positive effects.
- 5C17.37 Markets are supported in the Borough through policy ED12 and could help contribute to tackling worklessness and thus achieving SA Objective 19. New markets are only supported where they do not harm existing shopping facilities or markets located in town centres, further enhancing and safeguarding the town centre retail offer and positively contributing to SA Objective 17.
- 5C17.38 Policy ED15 on employment and training should result in significant positive effects on SA Objectives 17 and 19, particularly for young and/or unemployed residents of the borough. ED15 seeks to promote employment and training opportunities for local people to generate employment opportunities.

Social infrastructure policy S2

- 5C17.39 Policy S2 may help contribute to tackling a cause of worklessness development proposals for more than 500 residential units should incorporate suitable childcare provision to meet additional need arising from the development that cannot be met by existing local facilities. Inadequate local childcare can be a cause of worklessness and therefore it is considered that positive effects should result on SA Objective 19.

Transport policies T1 – T5, T8 – T10

- 5C17.40 The transport policies have very real potential to create significant positive effects for prosperity and economic growth in the borough, as well as providing opportunity for rewarding and satisfying employment. Easy and accessible transport links both within the borough and to outside the borough are considered essential for improved prosperity and economic performance of Lambeth, as well as attracting more inward investment. Lambeth has a variety of employment assets that attract people from outside the borough, including tourism, health, public sector and educational facilities. Therefore, maintenance and improvement of transport infrastructure in the borough is important for the attainment of SA Objectives 17 and 19 and is considered critical for the boroughs development. The policies should also assist in improving the social and environmental performance of businesses in the Borough (particularly policies T3, T5, and T8).
- 5C17.41 Uncertainties in securing funding and delivering public transport improvements such

as a new station at Brixton and/or and Tulse Hill providing access, including step-free to London Overground has potential to adversely impact on the local economy and effective achievement of SA Objectives 17 and 19.

- 5C17.42 Policy T10 on digital connectivity infrastructure ensures the borough keeps pace with technological advances. The policy supports delivery of high quality infrastructure to enable the future expansion of electronic communications networks, including next generation mobile technology and full fibre broadband connection. This is considered critical in sustaining a strong and dynamic local economy, tackling worklessness and providing opportunity for rewarding satisfying employment.

Environment and open space policies EN3, EN4

- 5C17.43 Policies EN3 (low carbon and renewable energy) and EN4 (sustainable design and construction) policies in particular will help improve the social and environmental performance of businesses. Some may argue that the policies cause additional financial burden to developers through the need to incorporate low carbon technologies, achieve BREEAM levels and the provision of living roofs and walls and the urban greening factor. However, it is considered that such costs are offset by the social and environmental benefits they provide, as well as reduced energy costs from running the business. Fundamental to the stability of the economy is ensuring a secure energy supply. A secure energy supply enables businesses to function, whilst also reducing reliance on fossil fuels, and thereby mitigating climate change, thus improving the social and environmental performance of businesses. In order to reduce costs to the developer, measures provided by policies EN3 and EN4 need to be incorporated into the very early stages of concept and design. Demand for 'green' goods and services may stimulate new job opportunities in the borough particularly towards a zero carbon future.

- 5C17.44 The provision of green infrastructure will result in economic benefits to the borough. There is evidence that good quality green spaces can help attract businesses and investment, contribute to employee productivity, and encourage consumer spending. London Metropolitan University's assessment of the impact of green infrastructure in Victoria found that nearly 70% of workers surveyed felt 'happier' being employed in an area with more green spaces (Green Capital, 2016).

Quality of built environment policies Q9 & Q17

- 5C17.45 High quality well designed commercial buildings are attractive to prospective investors and therefore, when implemented appropriately, the policies will likely result in significant positive effects on the economic growth of the borough, while also contributing towards a more satisfying environment for workers.
- 5C17.46 Advertisements and signage will be carefully managed through policy Q17, and in order to enhance the environment, renewal of existing large panel advertisements will be resisted. On-street advertisements are assessed against other built environment and transport policies. Tall buildings in appropriate locations provide additional business premises opportunities which should also contribute to the local economy. Overall, it is considered that all design policies will result in positive effects on SA Objectives 17 and 19, the local economy and tackling worklessness.

Places and neighbourhoods policies PN1-PN11

- 5C17.47 Significant positive effects on both SA Objectives 17 and 19 are expected from the Waterloo policy (PN1). The policy seeks to support employment opportunities for local residents and promote new training opportunities. The range of cultural and social infrastructure proposed will enable people to live better for a given income. The policy seeks to maintain the area's diverse employment offer relating to its status

as an international centre for culture and arts; a pre-eminent international, domestic and local tourist, leisure and entertainment area; and as a major location for offices, creative and digital industries, healthcare, MedTech and life sciences businesses and higher education. Policy PN1 states that at least 50 per cent of original ground-floor units in the Lower Marsh/The Cut/Leake Street Special Policy Area should be in A1 retail use. Goad data for the new Lower Marsh/The Cut/Leake Street Special Policy Area will be available in 2020.

- 5C17.48 As another Opportunity Area, Vauxhall offers substantial benefits for regenerating the local area to maximise benefits for local economy and employment generating activities. Development of the new district centre is expected to create new jobs, including construction jobs, which will provide a boost to the local economy and help tackle worklessness of local residents by providing the unemployed with opportunities to be involved in the transformation of Vauxhall (example implementation of policy ED15). The new retail cluster will provide a range of facilities and services, including at least 25% ground floor A1 retail offer, all of which will contribute to attaining SA Objectives 17 and 19. The Vauxhall CAZ retail cluster is still growing and establishing; currently 23% of ground floor units are in A1 retail use, an increase since the 2018 figure (Goad 2019). Nonetheless, overall, it is considered that regeneration of the Vauxhall area will result in significant positive effects on the local economy and improved employment rates.
- 5C17.49 Policy PN3 for Brixton will result in significant positive effects on SA Objectives 17 and 19 as it supports an increase in the amount of employment floorspace, and the Creative Enterprise Zone through the promotion and growth of the existing cluster of creative and digital industries active in Brixton. Proportions of A1 retail and food and drink uses are carefully managed, throughout the town centre with different percentages applicable in the indoor markets. All independently accessed upper floorspace in D1 or B1 use will be protected. SA recommendation 96 on the DRLLP was accepted and has been incorporated into the DRLLP PSV. It clarifies that the protection of D1 and B1 applies to the upper floor of the indoor markets. The Brixton primary shopping area has 65% in A1 retail use (in-house survey 2019), well above the policy requirement of 60%. An Article 4 Direction on Brixton town centre prevents change of use from B1(a) to C3 use, resulting in positive effects for the Brixton economy. It is considered that the Brixton policy improves accessibility to employment, especially for local people, and will likely improve employment opportunities among Black, Asian, Ethnic and Minority groups while also supporting and preventing loss of local businesses, and encouraging business start-ups and the growth of businesses. Accordingly, significant positive effects on SA objectives 17 and 19 are expected.
- 5C17.50 On the whole positive effects for the local economy and workless population should result from policy PN4 for Streatham. Regeneration to create a vibrant and viable town centre with a diverse economy including retail, leisure, offices, hotels and housing together with investment in public realm and public transport will likely result in significant positive effects for Streatham with regards to SA objectives 17 and 19. It is noted that the DRLLP PSV 2020 text for policy PN4 states that 'The town centre has experienced high levels of loss of office space through permitted development rights and this lack of offices and a comparative shortage of suitable SME workspace presents a challenge for growth in Streatham's employment offer'. SA recommendation 97 on the DRLLP suggested that 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. The recommendation was accepted and policy PN4 has been

changed to reinforce the support for office floorspace in Streatham, including space for creative and digital industries. This is considered to adequately address the SA recommendation and will likely result in positive effects on SA Objectives 17 and 19. The Streatham Hill primary shopping area has 69% of ground floor units in A1 retail use. Streatham Central primary shopping area has 60% ground floor units in A1 retail, in line with policy PN4. Streatham Hill has 23% in A3/A4/A5 use while Streatham Central has 13% in food and drink use (Goad 2019).

- 5C17.51 Clapham town centre has reached saturation point for food and drink uses, and therefore no further pubs, bars and hot food takeaways are permitted for this centre. Across whole Clapham district centre 33% of ground floor units are currently in food and drink use. Within the Clapham primary shopping area 40% of ground floor units are in A1 retail use (Goad 2019). At least 50% of ground floor units in the primary shopping area need to be in A1 retail use to help redress the balance of retail and non-retail uses in the centre. In time, this should result in a stronger local economy with improved social and environmental business performance (more retail needs being met within the centre and within the borough). The policy supports creative, visual and performing arts and cultural sector, thus contributing to a more diverse economy. It is unclear how the extent of worklessness can be addressed given it is a smaller centre, however there is provision for street markets and community innovation, and the centre does provide a number of jobs in hospitality.
- 5C17.52 Stockwell is a small district centre also, and is unlikely to deliver significant benefits to the local economy, although the policy does seek to encourage commercial, civic and other employment uses, particularly small business space suitable for creative and digital industries. It is unclear how worklessness will be tackled and it is expected that most residents of the local area will need to travel out of Stockwell for employment. Retail is encouraged, whereby no fewer than 50% of original ground floor units in primary shopping area should be in A1 use. There is currently 54% ground floor units in A1 retail use in the Stockwell District Primary Shopping Area (Goad 2019).
- 5C17.53 Policy PN7 for West Norwood promotes retail-led mixed use development. The West Norwood Commercial Area seeks to protect Lambeth's largest KIBA whilst supporting opportunities to create a hub of creative enterprise, innovation and industry. Part of Norwood High Street is designated as a Creative Enterprise Zone (CEZ) to redefine and revitalise the role of Norwood High Street for creative and digital enterprises. Within the West Norwood primary shopping area, 57% of ground floor units are in A1 retail use, slightly more than policy requirements which indicates good health for the local economy. Overall it is considered that the policy contains strong ambition to sustain and improve the local economy and should result in significant positive effects with respects to SA objectives 17 and 19.
- 5C17.54 Policy PN8 for Kennington / Oval seeks to support growth to make it an important area for residential and employment. It seeks to protect and intensify industrial floorspace within the areas KIBAs and improve the quality and extent of shopping and other appropriate town centre uses within the centre. The centre includes Kennington Business Park which is a KIBA and is therefore protected for its employment and business use.
- 5C17.55 Herne Hill, Loughborough Junction and Upper Norwood policies seek to provide retail and appropriate town centre uses. Like other small district centres, Herne Hill and Upper Norwood seek no less than 50% ground floor units in A1 retail and no more than 25% in A3/A4/A5 food and drink use. Currently 43% of ground floor units are in A1 retail use in the Herne Hill primary shopping area (2018 update to in-house

survey 2019). Growth of the creative and digital industries is supported in all three of these places/neighbourhoods. The policy for Loughborough Junction seeks to encourage new employment uses, thus helping to tackle worklessness in the local area. Creative industries are sought for Loughborough Junction, and in particular applications which bring back into use vacant and/or dilapidated railway arches and workspaces will be supported. Public realm improvements are supported and these can help attract business investment. It is considered the policy indirectly seeks to tackle causes of worklessness by ensuring necessary services (like childcare) are within walking distance of homes. However, it is uncertain how effective the policy will be on tackling worklessness in this particular area known for its high levels of deprivation, although the centres proximity to Brixton (and all its employment opportunities) is recognised, as it the support for improvements to Loughborough Junction yards.

5C17.57 Overall, it is considered that the approach requiring different percentages of retail and food and drink uses for different centres will likely result in significant positive effects for SA Objectives 17 and 19 for each local place, but also on social SA Objectives such as health, liveability, services and travel. Nevertheless it should also be pointed out that there is some element of economic risk to this. It could be argued that control of ground floor town centre uses (e.g. A use classes) should be managed through market demand. There is also some current uncertainty on the 'future of the traditional high street' given the increased use of online shopping. In order to combat the demise of retail on the high street it is considered that strong policy requirements need to be in place. The policies have been developed based on a robust evidence base specific for the borough and each local place, and it is therefore considered that this risk to the local economy is low. Positively, a number of centres meet or exceed policy targets for A1 retail use: Brixton, Streatham, Stockwell and West Norwood. The centres that fall below policy requirements include Vauxhall, Clapham Primary Shopping Area and Herne Hill. It is also important to note that the economic success of places and neighbourhoods (and the achievement of SA Objectives 17 and 19) is largely dependent on the delivery of transport and other infrastructure to support economic (and housing) growth. The Infrastructure Delivery Plan identifies funding gaps for some projects, that, if and when delivered, will increase access to employment opportunities and therefore benefit all people but particularly people with disabilities and mobility constraints, and people in more deprived areas (particularly where transport improvements better link deprived area to areas of employment).

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

5C18.30 Overall, and taking into account the criteria outlined in the Sustainability Framework, it is considered that the DRLLP PSV 2020 seeks to create and sustain prosperity and business growth and increase the amount of and access to employment generating activities.

Table 24: Summary assessment of effects of the DRLLP PSV 2020 on economy and worklessness

Assessment of effects of the DRLLP PSV 2020 on SA objectives 17 & 19	Score	Justification of Score	Timescale and probability	Permanent or temporary
<p>Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses</p> <p>And</p> <p>Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.</p>	++/?	<p>On the whole and taking into account the extent planning policy can offer all residents rewarding, well located and satisfying employment; it is considered that the DRLLP PSV will have significant positive effects on these SA Objectives, existing baseline conditions and key sustainability issues on employment and economy as outlined in Table 4. While the borough does not have London Plan designated Strategic Industrial Land, the DRLLP PSV does seek to maintain its stock of KIBAs and other employment generating and business use land. Policy ED15 seeks to upskill the local population and ensures local jobs, particularly associated with new construction, go to local people. Many of the places and neighbourhoods policies make provision for a range of affordable and flexible workspaces to support local independent retailers and attract a range of different industries, including growth of creative and digital industries. All Opportunity Areas and major town centres (including those close to areas of high deprivation) promote mixed use development support existing town and local centres and provide appropriate, accessible land to support employment.</p> <p>However, there is a small level of uncertainty whether the strong retail drive of town centres will result in significant positive effects in the short term given current economic uncertainty and stagnation (regarding Brexit) and the increase in online shopping. However, positively Brixton, Streatham Stockwell and West Norwood are meeting or exceeding policy targets for A1 retail use. An element of uncertainty also exists on how market forces will impact employment rates and the local economy, given current economic</p>	<p>Significant positive effects on the local economy will be evident in the short term through opportunities related to construction of new developments, particularly in Opportunity Areas and the current protection of KIBAs and non-designated industrial sites and existing office floorspace. Significant positive effects will likely continue in the mid to long term as developments are occupied both through occupied business/office space, but also through increased population supporting town and local centres. Economic growth in rejuvenated town centres like Brixton and Streatham is likely to be seen incrementally over the plan period with cumulative benefits apparent in the medium to long term. Variations in the number of A1 retail premises may correspond to changes in the way consumers use high streets and online shopping habits will likely impact levels of retail on the high street, and therefore the positive effects on the borough's economy will likely be evident in the</p>	Permanent

		<p>hardship. The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market), the nature and scale of any relocation of existing employment on site and the recruitment policies of prospective employers. Similarly, for town centres and the borough's economy to thrive sustainably, transport and other infrastructure needs to be in place to support such growth. There are some uncertainties on when, for example, some transport projects (that would improve accessibility for many to employment areas) will be funded and delivered.</p>	<p>medium term and beyond as changes in the way we shop and use high streets evolve.</p> <p>Improvements to transport infrastructure are most likely a medium to long-term target, the latter for projects that do not have identified funding.</p>	
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Recommendations for monitoring likely significant and uncertain effects

5C17.58 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- Net change in B1a floorspace through completed developments (including prior approvals)
- Net loss of B1a floorspace through completed Prior Approval developments (ie permitted development for change of use from office to residential)
- Net additional affordable workspace floorspace (completions and approvals)
- Net change in completed B1b, B1c, B2 and B8 floorspace in KIBAs and outside KIBAs
- Proportion of original ground floor units in A1 retail use in
 - a) i) Lower Marsh/The Cut/Leake Street Special Policy Area
 - ii) Streatham Hill Primary Shopping Area
 - iii) Streatham Central Primary Shopping Area
 - iv) Clapham Primary Shopping Area.
 - b) Vauxhall CAZ Cluster.
 - c) Brixton Primary Shopping Area
- Proportion of vacant units in Brixton and Streatham Major centres, Clapham and West Norwood District centres and Waterloo and Vauxhall CAZ Retail Clusters
- Proportion of original ground floor units in A3/A4/A5 food and drink use in
 - i) Streatham;
 - ii) Clapham; and
 - iii) Brixton Primary Shopping Areas
- Proportion of original ground floor units in A3/A4/A5 food & drink or nightclub use in Brixton Evening Economy management area
- Net additional visitor accommodation bedspaces
- Unemployment rates
- Number of businesses registered in the borough
- Number of vacant premises in town centres
- Total amount of additional employment floor-space, by type
- Total amount of employment floor-space, by type
- Total amount of floor-space for 'town centre uses'

5C18. REGENERATION AND EFFICIENT USE OF LAND

5C18.1 This section of the SA relates to the sustainability performance of the DRLLP PSV 2020 against:

Objective 18: To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings, taking into account constraints such as contaminated land.

5C18.2 To achieve this objective, plan policies should have benefits to the most deprived areas and communities; help make people feel positive about the area they live in; help reduce the number of vacant and derelict buildings; make best use of scarce land resources and reuse brownfield sites; promote the efficient, innovative and multifunctional use of land; ensure the provision of adequate quantities and type of public realm; and protect the Borough's soil resource.

Relevant policy objectivesNational Level

5C18.3 *National Planning Policy Framework 2019* states that policies should support development that makes efficient use of land. Policies should promote the effective use of land in meeting the need for homes and other uses while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or brownfield land. Planning policies should encourage multiple benefits from urban land; recognise that some undeveloped land can perform many functions; give substantial weight to the value of using brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; promote and support the development of under-utilised land and buildings (para 118).

Regional Level

5C18.4 The Draft *London Plan* contains a number of policies applicable to efficient use of land and regeneration. Policy GG2 is on making the best use of land. In delivering good design, it is necessary to determine the capacity for growth; the outcome of the process must ensure the most efficient use of land is made so that development on all sites is optimised. Policy D6 Optimising density states that development must make the most efficient use of land, and policy H4 Meanwhile uses as housing states that boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development. Sites with industrial land-uses are also encouraged to make more efficient use of land. The Draft *London Plan* identifies Opportunity Areas (significant locations with development capacity to accommodate new housing, commercial development and infrastructure, linked to existing or potential improvements in public transport connectivity and capacity. Many Opportunity Area overlap with Strategic Areas for Regeneration.

Baseline conditions and existing issues

5C18.5 The London Borough of Lambeth is a dense urban district that is largely residential in nature. There are designated areas of open space, key industrial and business areas and town centre / major / district shopping designations.

5C18.6 The Draft London Plan Opportunity Areas of Waterloo and Vauxhall present continued potential for commercial development and jobs growth in the borough, alongside their potential to provide new housing. Waterloo is a major office location, one of the capital's most successful tourist areas and an international centre for culture and the arts. Vauxhall is undergoing rapid change linked to the wider regeneration of Battersea/Nine Elms. Both areas can make an even greater contribution to the central London economy than they already do, if they are planned and managed effectively as part of the London Plan Central Activities Zone, in partnership with key stakeholders.

5C18.7 However, this will not happen unless the capacity of the public transport infrastructure servicing these areas also grows at a sufficient rate to meet the increased demand generated by new development. Although both areas are served by major transport interchange, these are already operating at capacity. Major developers will be expected to contribute to meeting the cost of increasing capacity in order to mitigate the impact of their schemes. This will be alongside significant public sector investment (Vauxhall Area SPD 2013). The new Nine Elms Station in Lambeth that will bring the Northern line to the Vauxhall area will improve transport connections and open up a range of opportunities for the borough's residents and businesses that would not otherwise come forward. Developers providing new jobs will also be expected to contribute to programmes of support for Lambeth's unemployed or economically inactive residents, so that their chances of accessing these opportunities increase.

Likely evolution without the DRLLP PSV 2020

5C18.8 In the absence of the DRLLP PSV 2020, regeneration will likely continue however; local specific guidance and detail (relating to a raft of place making measures like design, sustainable transport, accessibility, community facilities etc.) will be lacking and as such regeneration may be delivered in a less co-ordinated and less cohesive manner. Development may be brought forward that is not appropriate for the local context (for example overconcentration of student housing or fewer affordable housing). If the council is to drive growth, manage the consequences of it and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without an up-to-date Local Plan, the council's ability to guide and shape investment and development will be significantly diminished.

Assessment of Policies

5C18.9 This section examines the likely significant effects of implementing the DRLLP PSV 2020 policies on SA Objective 18 Regeneration and efficient use of land. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole revised Plan on the objective. This review takes account of mitigation already included within the proposed Plan.

5C18.10 The following policies have been screened as having potential for significant effects on this objective:

D1 – Delivery and monitoring	H4 – Housing size mix in new developments
D2 – Presumption in favour of sustainable development	H5 – Housing standards
D3 – Infrastructure	H6 – Residential conversions
D4 – Planning obligations	H7 – Student housing
H1 – Maximising housing delivery	H10 – Gypsy and Traveller needs
H2 – Delivering affordable housing	H11 – Estate regeneration
H3 – Safeguarding existing housing	H12 – Build to rent
	H13 – Large-scale purpose-built shared living

Sustainability Appraisal

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ED1 – Offices (B1a)	EN6 – Flood risk
ED2 – Affordable workspace	EN7 – Sustainable waste management
ED3 –KIBAs	Q6 – Urban design: public realm
ED4 – Non-designated industrial sites	Q7 – Urban design: new development
ED5 – Work-live development	Q9 – Landscaping
ED6 – Railway arches	Q17 – Advertisement and signage
ED7 – Town centres	Q20 – Statutory listed buildings
ED11 – Local centres and dispersed local shops	Q18 – Historic environment strategy
SI1 – Safeguarding existing social infrastructure	Q26 – Tall buildings
SI2 – New or improved social infrastructure	PN1 – Waterloo and South Bank
SI3 - Schools	PN2 – Vauxhall
T1 – Sustainable travel	PN3 – Brixton
T7 – Parking	PN4 – Streatham
EN1 – Open space, green infrastructure and biodiversity	PN5 – Clapham
EN2 – Local food growing and production	PN6 – Stockwell
EN4 – Sustainable design and construction	PN7 – West Norwood/Tulse Hill
EN5 – Flood risk	PN8 – Kennington/Oval
	PN9 - Herne Hill
	PN 10 – Loughborough Junction
	PN11 – Upper Norwood/Crystal Palace

Delivery and monitoring policies D1 – D4

- 5C18.11 Policy D1 ensures the council will work with a range of partners to explore regeneration opportunities, and that use of previously developed land and vacant buildings, including the beneficial use of vacant historic buildings (commensurate with their conservation) are optimised. Developments will be supported by appropriate green, social and physical infrastructure (policies D3 and D4). Delivery of such infrastructure will help ensure efficient use of land and successful regeneration projects. It is likely that policies D1 – D4 will result in significant positive effects on SA Objective 18 as they seek to optimise previously used land and buildings, and tackle areas of deprivations (i.e. identified regeneration areas and town centres) while promoting and maintaining mixed, balanced and diverse communities within neighbourhoods.

Housing policies H1 – H7, H10 – H13

- 5C18.12 Housing policies promote new housing delivery and estate renewal and regeneration schemes. Overall all housing policies contribute towards delivery of more and improved quality (warmer, safer and healthier) housing and more genuinely affordable housing in the borough. Policies seek to improve conditions for the disproportionate number of people, often BAME, older people and lower income people living in Lambeth's older housing stock. Housing density should be optimised in accordance with the design-led approach set out in Draft London Plan policy D6, as per policy H1. Proposals that bring back into use long-term empty homes and derelict homes are supported by policy H3. Housing developments will need to incorporate affordable housing provision and a range of dwelling sizes and types, which should provide regeneration benefits to deprived areas and communities, particularly for overcrowded households. Policy H4 housing size mix in new developments ensures that accommodation size is based on community needs and the needs of intended occupiers, thus benefiting the most deprived areas and communities. Housing standards (H5) and residential conversions (H6) will improve efficient use of land by ensuring good design principles are applied and family dwellings of less than 130m² are protected. Policy H7 student housing will likely result in indirect positive effects on SA Objective 18 ensuring that student housing does not compromise the need for affordable family homes or displace other key uses, thus ensuring benefits to the most deprived areas and communities. Furthermore, H7 (e) supports the temporary use of ancillary uses of purpose-built student accommodation for public use during vacation periods, thus making efficient use of land and development. Policy H10 on gypsy and traveller needs, identifies that future need of pitches can be accommodated through managing the churn in vacant pitches on the existing traveller site in Streatham Vale, thereby maximising efficient use of the existing site. Any new site proposed must be economically, socially and environmentally sustainable and it is considered that the criteria for new sites seek to maximise benefits for this community. Overall it is considered that policy H11 on estate regeneration has potential to benefit the most deprived areas and communities, help people feel positive about the area they live in, and make the best use of land. Estate regeneration schemes must achieve at least 50 per cent affordable housing and provide social, economic, environmental and health benefits. Build to rent (H12) and large-scale purpose-built shared living products (H13) offer housing options that will potentially appeal to different types of people/communities. It is considered that policy H13 of large-scale purpose-built shared living will result in efficient use of land in Waterloo and Vauxhall, provided there is a market for this type of housing. Overall it is considered the housing policies will result in significant positive effects on SA 18.

Economic development and town centre policies ED1 – ED7 and ED11

- 5C18.13 Policy ED1 seeks to protect office floorspace and as such, redevelopment of offices for a mix of uses will be supported if the quantity of original B1a floorspace is replaced or increased as part of the development or elsewhere in the vicinity within Lambeth. Proposals involving a complete loss of office floorspace will not be permitted unless certain tests are met, one of which is that the floorspace has been vacant and continuously marketed for a period of at least two years. It is noted that this is an increase of an additional one year to current adopted Local Plan policy. While it is recognised that this additional time seeks to ensure there is no demand for office floorspace, it can also be argued as an inefficient use of land/building space. As such, SA recommendation 98 on the DRLLP has been accepted and incorporated in the DRLLP PSV. Supporting text has been included as follows: 'The use of vacant office space for short-term meanwhile uses 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 marketing requirements'. The response and additional text is noted and is considered sufficient to address the recommendation on the DRLLP, as well as provide positive effects on SA Objective 18 by improving efficiency in land use and re-use of existing buildings during the marketing period.
- 5C18.14 It is considered provision of affordable workspace (policy ED2) seeks to benefit deprived communities, and help them feel positive about the area they live/work in.
- 5C18.15 While policy ED3 does not promote the multifunctional use of land in its widest sense (KIBAs), the policy ensures a stock of sites is maintained in the borough for business and employment generating uses which provide other key social and economic benefits to the borough and residents. Policy ED4 seeks to intensify industrial uses on non-designated industrial sites and mixed-use or residential development on these sites will only be supported in line with criteria set out in Draft London Plan policy E7. Taking into account all land in the borough and the different land-uses required it is considered policy ED4 promotes efficient, innovative and multifunctional use of land.
- 5C18.16 Policy ED5 of work-live development states that change of use of work-live accommodation to residential use will not be permitted. On the one hand, work-live is an efficient use of land. However, on the other hand the policy makes no allowance for marketing evidence that demonstrates no demand for the work element of the work-live accommodation. If there is no demand for the work component of an existing work-live site, it may be considered an inefficient use of land, particularly when there are other issues facing the borough such as supply of larger family size homes. This concern has been raised in previous SA work and the response was that the approach is intentional as historically, changes of use from work-live have resulted in an incremental loss of employment uses to residential. No additional changes have been made to this policy in the DRLLP PSV 2020 so it is considered that the policy team is satisfied with their policy position and previous response.
- 5C18.17 It is considered that use of railway arches in policy ED6 is an efficient use of land resource. Town centre policies (ED7) also support efficient use of land by providing for a range of uses. Diversifying the retail sector, encouraging small shops and promoting town centre development, including residential on appropriate sites and above ground floor, are likely to contribute positively to SA Objective 18. As is policy ED11, through the role of local centres and shops in meeting community needs.

Social infrastructure policies S11 – S13

- 5C18.18 Policies S1 – S3 should result in positive effects on SA Objective 18. Existing community premises are to be safeguarded for the most efficient use of the premises addressing changing needs and priorities of the community. New or improved community premises need to be flexible, adaptable and sited to maximise shared community use of premises. Appropriate provision of social infrastructure to meet additional need that will arise from development helps people feel positive about the area they live in. The schools policy promotes the shared use of schools for wider community use, which also demonstrates a means to improving efficiency in land use.

Transport policies T1, T7

- 5C18.19 Good accessibility across the borough, particularly by public transport, walking and cycling is an important part of successful regeneration of areas as it provides accessibility to local services and facilities, employment and education opportunities, as well as health benefits. Transport policies also provide for adequate provision of public realm for walking and cycling which should maximise regeneration benefits to deprived areas and communities of the borough. Parking policy T7 seeks to maximise efficient use of land by limiting car parking provision (less than Draft London Plan requirements).

Environment and open space policies EN1, EN2, EN4, - EN7

- 5C18.20 Open space and green infrastructure policies should result in significant positive impacts on regeneration and efficient use of land. Provision of (and access to) open space is necessary for healthy communities, but also plays important multifunctional roles such as flood management, biodiversity, improved air quality, food growing, leisure and sport. For these reasons, open space and green infrastructure in its own right is an efficient use of land and protection of existing open space is critical. Policy EN1 also requires major developments to provide new open space/access to nature improvements in areas of open space and/or access to nature deficiency and therefore, open space will form an important component of regeneration projects. Policy EN2 promotes food growing spaces, including the temporary use of vacant or derelict land or buildings and the use of incidental open space on housing estates and other open space areas.
- 5C18.21 BREEAM assessment tools provide credits for building reuse and brownfield development. All regeneration and development will need to comply with the requirements of policy EN4 on sustainable design and construction, and should help maximise regeneration benefits in deprived areas and communities, particularly through improved health outcomes and lower energy bills from improved energy efficient design and construction. The policy also seeks to improve the soil resource by requiring adequate remedial treatment of any contaminated land prior to development commencing. This also has associated health benefits for construction workers and occupiers of development, as well as positively contributing towards SA Objective 18.
- 5C18.22 Flood risk policy EN5 seeks to steer development towards areas of lowest flood risk and encourages use of sustainable drainage systems, further demonstrating multifunctional use of land. Policy ED6 on sustainable drainage systems and water management further endorses this approach, but also supports water efficiency measures including rainwater harvesting and greywater recycling, further ensuring developments promote efficient use of land. Policy EN7 on sustainable waste management supports the waste hierarchy, which, if implemented appropriately, will result in reduced quantities of waste to landfill, thereby contributing to protection of soil resource (albeit outside of the borough).

Quality of built environment policies Q6, Q7, Q9, Q17, Q18, Q20, Q26

- 5C18.23 It is considered that urban design policies on both public realm and new developments should result in significant positive effects on SA Objective 18, particularly in maximising regeneration benefits by ensuring long-lasting gains, and provision of adequate quantities and type of public realm. Landscaping of developments should avoid leftover spaces which seeks to ensure all land is put to some sort of use, whether useable open space, biodiversity, soft planting or if appropriate food growing.
- 5C18.24 The DRLLP PSV contains policies that seek to bring heritage assets back into viable use and good repair (policies Q18 and Q20) and this is supported with respect to SA Objective 18.
- 5C18.25 Tall buildings (policy Q26) can maximise use of the land resource and provide opportunities for multifunctional use of land. Potential adverse effects associated with tall buildings (such as dominance, shading, reduced privacy) need to be managed.

Places and neighbourhoods policies

- 5C18.26 Overall, it is considered that the places and neighbourhoods policies should result in significant positive effects on regeneration and efficient use of land. This is because policies seek positive change to previously developed land and existing buildings. However, it should be noted that the policies apply to sites within town centre boundaries (including the CAZ), and therefore may not result in direct regeneration benefits to the most deprived communities in terms of where they live. It is considered however that redevelopment of town centres may stimulate regeneration in other areas of the borough. Furthermore, these parts of the borough not covered by the places and neighbourhoods policies are covered by the borough-wide policies that form the rest of the plan and will apply for development proposals brought forward. Policies for Waterloo and South Bank and Vauxhall promote development in line with their respective Opportunity Area Frameworks and Central Activities Zone (CAZ) designations. While redevelopment of these areas will benefit the borough, it is unlikely to impact directly on the most deprived areas and communities of Lambeth, although public realm improvements particularly for walking and cycling may improve accessibility opportunities and integration with adjacent deprived areas. Policy PN3 on Brixton town centre focuses on much needed sensitive and sustainable regeneration in an area of high deprivation. The policy supports innovative opportunities, including the Creative Enterprise Zone (CEZ), creative, digital and green sectors, and promotes improvements to public realm. This can promote more regeneration of areas by acting as a focal point to attract more investment.
- 5C18.27 Mixed use developments are encouraged or proposed for all major centres and public realm improvements are provided for in all of the policies PN1- PN11. As highlighted above, such improvements may help stimulate regeneration in other adjacent deprived areas. Policy PN5 on Clapham and policy PN8 on Kennington/Oval both seek retention (and reuse) of specific buildings. Policy PN6 for Stockwell includes improvements to housing estates which will benefit this deprived area and community. Loughborough Junction is one of the most deprived areas in the Borough, and the policy seeks to address this through positive regeneration, such as sensitive new development to make better use of under-used spaces and places and encouraging new employment uses that revitalise vacant and/or dilapidated railway arches, resulting in clear identity and sense of place.

Summary of Draft Revised Lambeth Local Plan Proposed Submission Version 2020 policies

5C18.28 Overall, and taking into account the criteria outlined in the Sustainability Framework, it is considered that the DRLLP PSV 2020 seeks efficient use of land resource and stimulates regeneration that maximises benefits to the most deprived areas and communities.

Table 25: Summary assessment of effects of the DRLLP PSV 2020 on regeneration

Assessment of effects of the DRLLP PSV 2020 on SA objective 18	Score	Justification of Score	Timescale and probability	Permanent or temporary
To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.	++	<p>Overall it is considered that the DRLLP PSV provides the policy framework to allow regeneration that maximises deprived areas and communities and improves efficiency in land use through re-use of existing buildings and land.</p> <p>The DRLLP PSV promotes multifunctional use of land in many areas through mixed use developments. Regeneration of underused or vacant areas is an efficient use of the land resource. All places and neighbourhoods policies promote public realm improvements and while these are proposed for town centres it is considered that such improvements can also stimulate regeneration of wider areas. Public realm improvements will also result in improved accessibility of the wider area, and thereby benefit wider communities including most deprived areas/communities. Specific policies targeting more deprived areas for example Brixton and Loughborough Junction seek to stimulate sensitive regeneration, which will result in wide ranging benefits to for local communities.</p> <p>The SA recommends reconsideration of the two-year marketing period for loss of office floorspace. Current adopted Local Plan policy only requires one year of marketing. Floorspace that is vacant for two years may be considered an inefficient use of land. The policy team may wish to consider incorporating meanwhile uses into the policy or offering some sort of incentive where floorspace is temporarily used for another land use during the continuous two-year marketing period.</p>	<p>Regeneration in Opportunity Areas is already occurring and will likely continue into the long term.</p> <p>Regeneration of other places and neighbourhoods will likely occur in short term for some sites (that already have planning permissions) and between mid to long term relative to the current difficult economic climate/labour availability due to Brexit.</p> <p>Smaller scale improvements, for example minor public realm improvements may already be evident in some areas or otherwise will likely be evident in the short term.</p>	Permanent.

Recommendations for monitoring likely significant effects

5C18.29 It is recommended that the following indicators are used to monitor the effects of the Revised Lambeth Local Plan identified in the SA:

- Number of existing vacant or dilapidated / derelict buildings brought back into use
- Number of regeneration projects completed in deprived areas.
- Housing supply: number of net additional dwellings completed.

6 SUMMARY AND CONCLUSIONS

The Draft Revised Lambeth Local Plan Proposed Submission Version 2020

- 6.1 The current Lambeth Local Plan was adopted by the Council in September 2015, following the statutory process of preparation and examination. The Inspector for the Local Plan examination found it sound subject to early review to take account of the higher borough-level housing target in the Further Alterations to the London Plan 2015, which had been published too late to be included in Lambeth's Local Plan 2015. In May 2016 the new Mayor of London was elected and he immediately initiated a full review of the London Plan. The new London Plan is expected to be adopted in 2020. The DRLLP PSV 2020 has been prepared taking into account the emerging London Plan, including modifications from the examination.
- 6.2 In addition, since September 2015 there have been a number of significant changes to the national planning policy and legislative context, and others are emerging. These include the Housing and Planning Act 2016, the introduction of permissions in principle, ongoing changes to permitted development rights, national commissions into the local plan making process, new National Planning Policy Framework 2019, the Neighbourhood Planning Act 2017, the Housing White Paper 2017 and Build to Rent policy.
- 6.3 The DRLLP PSV 2020 sets out the spatial strategy, long term spatial vision, strategic objectives and policies for development, and identifies a limited number of sites for development within Lambeth to cover the period up until 2035. It is based on the social, economic and environmental objectives and priorities of the Lambeth Borough Plan 2016-2021, together with other relevant plans, programmes and strategies all of which have implications for the development and land use within the borough. The spatial strategy, spatial vision and strategic objectives in the DRLLP PSV 2020 remain largely unchanged from the adopted Lambeth Local Plan 2015. The limited number of sites for development in the DRLLP PSV 2020 have been carried through from the Lambeth Local Plan 2015.
- 6.4 The London Borough of Lambeth covers an area of about ten and a half square miles, including Waterloo and the South Bank, Vauxhall, the Oval, Kennington, Stockwell, Clapham, Brixton, Loughborough Junction, Herne Hill, Streatham, Tulse Hill, West Norwood and Gypsy Hill. Lambeth is an inner London borough with the north of the borough having a mix of central London activities, while the south of the borough is predominately suburban in character.
- 6.5 The borough has an important historic environment with 62 Conservation Areas covering approximately 30 per cent of the borough including circa 2,500 listed buildings, the vast majority of which are nineteenth century residential dwellings. There are also 17 Archaeological Priority Zones and eight historic Registered Parks and Gardens as well as protected strategic views in the north of the borough of St Pauls Cathedral and the Palace of Westminster which is a World Heritage site.
- 6.6 Lambeth is a very diverse borough ethnically, culturally, socially and economically and this diversity is constantly evolving. It is the among the most densely populated local authority in England, with over 100 people living in each hectare, more than twice the London population density. Nearly a third of a million people live in Lambeth – at least 318,000. It has a complex social and ethnic mix, with large African and Portuguese populations, and is an important focus for the UK black Caribbean population. The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. Lambeth is the 8th most deprived borough in London and 22nd most deprived in England. This is an improved relative position

since 2010 when Lambeth was ranked as the 14th most deprived authority in England. The most deprived places in the borough are mostly in Brixton and Stockwell, with some in Knight's Hill.

- 6.7 Public transport provision in the Borough is generally good for non-disabled people but less good for those with disabilities or access needs. There are 14 over-ground railway stations evenly spread throughout the borough and nine underground stations predominantly in the north. However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. Access to public transport is good in north and central Lambeth however; residents in Streatham and West Norwood are dependent on rail and bus connections. As Lambeth has the lowest car ownership rate in London, there is even more reliance on public transport.
- 6.8 The DRLLP PSV 2020 sets out the strategic approach to planning for development in the borough up until 2035. The spatial strategy, vision and strategic objectives largely remain unchanged from the current Lambeth Local Plan 2015. Some significant areas of proposed policy change from the Lambeth Local Plan 2015 include:
- Inclusion of the new London Plan borough-level housing target of 1,335 net additional dwellings per annum in Lambeth, with policies to support delivery of this target, including on smaller sites
 - Rewrite to align fully with the Draft London Plan approach to affordable housing, including Fast Track approach (whereby major development proposals that meet London Plan-set thresholds for affordable housing and other Local Plan policy requirements can follow a 'Fast Track Approach' without viability testing at planning application stage) on sites providing between 10 and 25 units; and reinstatement of the requirement for payment in lieu of affordable housing on sites providing between 1 and 9 units, subject to viability.
 - Change in the approach to managing residential conversions away from streets designated as 'under conversion stress' to introduction of a minimum size threshold of 130m² across the borough, plus a requirement to include a family-sized flat in converted dwellings and clear restrictions on parking permits and on-street parking. This is in response to the Draft London Plan emphasis on new housing supply from small sites, including conversions, whilst maintaining a managed approach.
 - A new policy on build to rent that also provides clarification of the sequential approach to affordable housing, covenant and clawback mechanism, approach to rents and lettings for DMR units, and approach to family sized dwellings
 - A new policy specifically relating to estate regeneration schemes
 - Stronger protection for existing office floorspace and clear support for new floorspace to support economic growth in the borough
 - A new policy requiring major office schemes in the north and centre of the borough (including in the proposed new Brixton Creative Enterprise Zone) to provide affordable workspace for smaller creative and digital enterprises. Rewrite of the affordable workspace policy to clarify that it only applies to B1a offices above 1,000sqm in the required locations; the three approaches to

securing affordable workspace; the relationship with the Fast Track approach in mixed use schemes; and to include reference to the Workspace topic paper and emerging Affordable Workspace SPD.

- Additions to the policy on A2 uses to introduce specific controls on the number and concentration of betting shops and payday loan shops, which are now *sui generis* uses.
- Changes to the policy on hotels to clarify where they will and will not be supported, in accordance with the approach in the new London Plan: this includes no support for additional hotels in Waterloo, where there is a significant existing cluster, but support in principle for hotels in town centres elsewhere in the borough; and inclusion of a new requirement for hotel proposals to include a visitor management plan and planning obligations to mitigate any negative impacts.
- A full update of the policy on employment and skills to incorporate the new approach adopted in the Lambeth Employment and Skills SPD 2018.
- Reworked transport policies to support delivery of the Lambeth Transport Strategy 2019 and Implementation Plan, including Healthy Streets and a significant modal shift to walking and cycling.
- In policy S2 New or improved social infrastructure - an expanded requirement for larger residential schemes to assess impacts on social infrastructure and include provision to meet additional need or make a payment in lieu, and to cover management and maintenance costs
- A commitment to apply the emerging new London Plan policy on air quality to development proposals in Lambeth, and a stronger emphasis on urban greening (urban greening factor).
- New policy requirement for minor residential developments (1-9 units) to achieve at least 19% reduction in on-site carbon emissions beyond 2013 Building Regulations Part L; and reference to forthcoming Future Homes Standard 2025 and further updates to Building Regulations (policy EN4)
- Quality of building environment policies Q6, Q7, Q11 additional policy requirements on energy efficiency and climate change mitigation and adaptation
- A re-working of the policy to change the approach to development within the curtilage of existing buildings.
- A new clause to resist development on or in the River Thames.
- Rewrite of policy on tall buildings to clarify the approach both within and outside locations identified as appropriate, to address comments from GLA, Historic England and others
- A new policy dedicated to basement development, as required by the new London Plan; this brings together all policy on basements in one place in the Revised Local Plan.

- Update of policies and introductory text to take account of the current vision and aspirations for each area and include more consistent references to air quality focus areas, open space deficiency areas, The Lambeth Transport Strategy (including the Healthy Route Network) strategic areas of regeneration, business improvement districts and emerging neighbourhood plans, particularly the draft South Bank and Waterloo neighbourhood plan which has now been made.

6.9 The Places and Neighbourhoods policies provide a neighbourhood level expression of borough-wide policies. The policies have been rewritten in the DRLLP PSV 2020 based on comments received during consultation. Specifically, a new housing section has been added to the introductory text for each PN policy to clearly signal the housing growth potential for each area, based on the evidence and policy approach within the DRLLP PSV as a whole.

- Waterloo and South Bank is no longer identified as a metropolitan town centre. Instead, PN1 reflects the DLP which extends the existing CAZ retail cluster to cover a wider area and renames it as the Waterloo CAZ retail cluster. Lower Marsh/The Cut/Leake Street Arches are identified as a Special Policy Area to protect the small units and independent retailing in this area. This is the position proposed by Lambeth and agreed with the Mayor during the London Plan examination.
- Additional policy wording has been added to PN1 Waterloo to clarify the aspirations for the extension to Jubilee Gardens and the potential development of one third of Hungerford car park. A change to the boundary of the Metropolitan Open Land (MOL) at Hungerford car park is also included in the Proposed Changes to the Policies Map document (resulting in no net loss of area designated as MOL).
- Reference is included in PN1 Waterloo to the Waterloo and South Bank Public Realm Framework, which is a guidance document.
- Designation of a Creative Enterprise Zone in Brixton to promote growth in the existing cluster of creative and digital industries and enable a specific approach to securing affordable workspace. Further amendments to the approach to managing the mix of ground floor uses in the town centre, and a reference to the emerging Brixton Central Supplementary Planning Document.
- Continue to safeguard retail uses in Streatham but require no fewer than 50 per cent of ground floor units in each of the primary shopping areas to be in A1 use (change from 60 per cent). Further updated and emerging evidence such as the Streatham Investment and Growth Strategy.
- Encouraging an area-wide approach to investment and growth in Kennington/Oval to ensure integration with neighbouring opportunity areas and supporting high quality regeneration of the Oval gasworks and adjacent Tesco sites.
- Introduction of a Creative Business Cluster (Norwood High Street) in West Norwood to complement the adjacent Commercial Area by supporting mixed-use or enabling developments that deliver ground floor workspace for makers and creative and digital enterprises.

- The key development principles that had emerged through the partially completed Loughborough Junction masterplan have been included in Policy PN10. The policy and introductory text also take account of comments submitted by the Loughborough Junction Action Group and neighbourhood forum. The policy identifies opportunities for the comprehensive refurbishment and conversion of the Rathgar Road railway arches.
 - Protection for Cooper's Yard Studios in Upper Norwood for cultural, creative and digital uses.
- 6.10 The DRLLP PSV 2020 makes provision for new housing that will be of an appropriate housing mix, type and size to enable social inclusion, mixed use communities and the ability to remain in a community for a life time if so desired. Affordable housing policies have been strengthened (compared to Local Plan 2015) to better ensure delivery and availability of genuinely affordable homes for Lambeth residents (policy H2 and H12) in line with London Plan policy. All major developments will need to incorporate genuinely affordable housing (70 per cent low cost rented homes and 30 per cent intermediate products (e.g. London Living Rent, Shared Ownership). All housing will be well designed both individually and with other buildings and the surrounding environment and all residential developments will need to provide for affordable housing. Residential amenity will be protected. Overall it is considered that housing policies seek to respond to Lambeth housing demand, ensuring both delivery and design of housing is optimised.
- 6.11 The DRLLP PSV 2020 seeks to deliver community services and facilities that are accessible to everyone. Provision is made for additional community services and facilities to support projected population growth. These will be located and designed to increase accessibility regardless of age, gender, disability, ethnicity or faith and to maintain and improve community, culture, leisure and recreational activities available in the borough. For example, family housing should normally have direct access to a garden; residential developments for 10 or more children will need to incorporate children's play area; residential schemes of more than 25 units will need to assess impacts on social infrastructure and include provision to meet additional need on-site or make a payment in lieu; new developments will need to provide sufficient open space, especially in areas currently deficient of accessible open space; and intensive uses such as schools, shops, social infrastructure should be located close to public transport, cycling and pedestrian nodes, reducing the need to travel by car.
- 6.12 The borough's natural, cultural and archaeological heritage is well provided for in the DRLLP PSV 2020. Views to the World Heritage Site as well as the vast number of Conservation Areas, listed buildings and their settings, archaeology, and open green spaces will be appropriately protected during the plan period.
- 6.13 Developments will be well designed both socially in terms of social inclusion, accessibility, safety and reduced fear of crime; and environmentally, in terms of increased provision of green infrastructure, improved air quality, water efficiency, waste management and recycling, climate change mitigation and adaptation, and more efficient use of natural resources including land.
- 6.14 On the whole, it is considered that the DRLLP PSV 2020 has been produced with the premise of sustainable patterns of urban development actively borne in mind. Where appropriate, SA recommendations have been made on all versions of the draft plan during its development that have identified areas for policy improvement to either increase positive effects or mitigate potential adverse effects. A total of 98

recommendations were made on the SA of the Draft Revised Lambeth Local Plan October 2018. Appendix 1 sets these out, together with the policy response to each recommendation (Table 2). A total of 14 recommendations were made on the DRLLP PSV 2020. These were discussed with the policy team concurrently in their development of the DRLLP PSV and all 14 recommendations were incorporated into the DRLLP PSV 2020 (Appendix 1, Table 1).

- 6.15 Deliverability is a key issue for the DRLLP PSV 2020, particularly with regards to current uncertainty on the terms under which the UK will leave the EU (its impact on labour force, construction, investment in Lambeth for example) and a near stagnant UK economy. Significant growth is proposed for the borough, in terms of new housing, new business space as part of mixed use developments and associated population growth. Such growth will only be successful and sustainable if appropriate infrastructure is delivered to support it. For example significant redevelopment in Vauxhall is requiring additional improvements to public transport infrastructure in particular addressing capacity and accessibility. The Northern Line extension to Nine Elms will likely alleviate overcrowding issues on the northern line and provide more accessible public transportation however this is being delivered after occupation of new surrounding developments. New London Overground stations are required at Brixton and/or Loughborough Junction however the Infrastructure Delivery Plan states no progress on this project (including no funding). It is probable that population growth will precede any new public transport infrastructure, as developments are completed and occupied. There are funding gaps for a number of transport/public realm infrastructure projects, for example, Healthy Routes Network, platform lengthening at Wandsworth Road and Clapham High Street, step-free access at Brixton, Streatham and Tulse Hill Rail Stations and to the Northern Line at Waterloo. Funding gaps are expected to be met through CIL and/or S 106 obligations although it is not clear if this will cover the entire cost of projects. Therefore, there is a potential negative cumulative effect (at least in the short term) of development in Lambeth and neighbouring boroughs, on the capacity on public transport networks, arising from the resultant population increase. Capacity issues in Lambeth could be exacerbated by development in neighbouring areas, for example, further along the Victoria and Northern Underground Lines. This could in turn exacerbate capacity issues elsewhere in central London. It is unclear in the DRLLP PSV 2020 how much development can occur if particular infrastructure projects are not delivered.
- 6.16 There are also identified funding gaps for other types of infrastructure required to meet future needs arising from population growth, for example, improving and increasing capacity of the council's cemeteries and replacing cremators; increasing capacity at Crown Dale Medical Centre, Baldry Gardens Health Centre and Stockwell; a new primary care centre in Waterloo; increasing capacity for mental health care accommodation; replacement Waterloo Library and Lambeth Archives; improve and upgrade community facilities (including youth and play); improvements to parks and open space, including within housing estates; refurbishment of Brixton Recreation Centre; new indoor tennis centre; and provide electric charging infrastructure for the waste and recycling fleet. Funding gaps are expected to be met through CIL/section 106 although the extent is unclear. Positively, there are no identified funding gaps for the education projects.
- 6.17 In addition to the uncertainty in the delivery of infrastructure, it is considered there is also an element of uncertainty in the delivery of policies. While the policy framework for the protection, enhancement and sustainable use of natural resources in the DRLLP PSV 2020 is considered robust and positive; the degree and extent of positive effects in relation to, for example, air quality, urban greening, biodiversity, water quality, carbon emissions, will rely on the rigour on which the policy is

implemented at the planning application stage. Therefore, to some extent effects on the natural environment might be considered uncertain.

- 6.18 Reasonable alternative (RA) approaches have been considered in the DRLLP PSV 2020 plan-making process for the key issues considered in the partial review: housing growth and infrastructure; affordable housing; housing for older people; self-build housing; business and jobs; town centres; hotels; waste; air quality; and transport. These issues were explored through a series of topic papers and questions to help facilitate consultation and feedback, with links to further evidence where relevant. The topic papers identified different possible ways (reasonable alternatives) of addressing the key issues. An SA was prepared on the reasonable alternatives (see Appendix 2) identified in the topic papers/online surveys against the sustainability objectives (SA Framework) that were developed as part of the Scoping Report process. The results of the SA work on the issues and reasonable alternatives has helped inform the DRLLP October 2018 and DRLLP PSV 2020 (see section 5B for more detail).

Sustainability Effects

- 6.19 Overall, and in so far planning can influence particular areas, it is considered that the DRLLP PSV 2020, provides the policy framework to generally result in positive effects for the borough and upon baseline characteristics but as outlined above, deliverability of key infrastructure is a concern weighted with uncertainty. Table 26 shows the sustainability effects of the Plan for each SA Objective.
- 6.20 Effects arising from large development projects (for example, building more homes, intensifying industrial land-use) may be positive or negative. These effects may occur as a result of individual developments or cumulatively alongside other developments. The negative effects may involve added strain on natural resources (e.g. water resources, air quality, access to open space), pressure to build in areas of high flood risk and an increase in the volume of municipal waste. However, the DRLLP PSV 2020, together with the London Plan contains policies to manage and mitigate such effects. Consequently, so far as the local planning policy can influence, no significant detrimental effects are anticipated to occur as a result of this draft revised plan. However, given the level of uncertainty in how some policies will be implemented and deliverability of necessary infrastructure to support growth (see paragraphs 6.15-6.17 above); it is important to develop an effective monitoring regime to review the impacts and effectiveness of policy over time.
- 6.21 It is considered that previous SA conclusions of the vision and objectives remains valid and can be summarised as follows:

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

- *Timing: there is a danger that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front;*
- *Funding for some of the proposed infrastructure schemes has not been*

identified;

- *The proportion of open space per resident ('green infrastructure') is likely to reduce as the population increases whilst new open space opportunities are extremely limited.*

Table 26: Summary of SA scores

SA OBJECTIVE	SA SCORE
1. Ensuring safe communities with reduced crime and disorder	++
2. Promote a healthy borough, by reducing health inequalities and the causes of ill health.	++
3. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	+/?/-
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	?
5. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	++/?
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++/?
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++/?
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and historic assets.	++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++/?
10. To protect, enhance and promote biodiversity, and to bring nature closer to people.	++/?
11. To create, manage and enhance green infrastructure.	++/?
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	+/?
13. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	+/?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	+/?
15. To improve air quality	?/+
16. To maximise the education and skills levels of the population.	+
17. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	++/?
18. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings, taking into account constraints such as contaminated land.	++
19. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	++/?

6.22 A total of 14 recommendations have been made in this SA with the aim of improving the impact of policies on sustainability or reducing potential for negative effects. Recommendations include:

- *Policy H4 housing mix* - for market housing provision of family sized units is considered
- *Policy H5 housing standards* – better providing for actual useability of external amenity space; applicants are encouraged to exceed minimum internal space standards; clarify that London Plan guidance and standards apply relating to design and quality of housing; reinforce the requirements for accessible housing; and that children’s play areas should be inclusive as well as accessible.

- *Transport policies* – clarify that the cycle hire scheme is provided to all dwellings regardless of tenure; that development should contribute towards improvement of inclusive access to public transport (policy T1) and that Lambeth will seek better accessibility in public transport (policy T4).
- *Policy S2* - new social infrastructure buildings and facilities should also be designed to promote social inclusion
- *Policy ED 12* – recognition of the social value of markets
- *Policy ED13* - visitor attractions, leisure, arts and cultural uses now recognises importance of planning for safety, crime prevention and counter terrorism
- *Policy EN4* - 20% reduction in CO₂ emissions from on-site renewable energy generation should, where possible, be in addition to the required reductions through energy efficiency measures
- *Policy Q18* - Historic Environment strategy support the principle of climate change mitigation alterations and adaption responses within the historic built environment.

6.23 The SA on the DRLLP 2018 made 98 recommendations and all recommendations were considered by the policy team and have been responded to in preparing the DRLLP PSV 2020 (see Appendix 1 Table 2). Many involved clarifying policy intent and/or tweaking wording to improve outcomes for sustainability objectives. There were a few recommendations that sought to ensure better safety and health outcomes for people in the borough (for example policies on estate regeneration, parking, urban design, walking, cycling and Clapham). There were also recommendations that sought to include more references to air quality for a range of policies (for example policies on open space, trees, landscaping and places and neighbourhoods). Some recommendations would likely result in more positive effects for a number of different SA Objectives. For example measures to improve air quality would maximise positive effects for SA objectives 2, 5, 6, 7, 15. Appendix 1 provides the full schedule of SA recommendations.

6.24 It is important to note judgements have been made taking into account the London Plan directive on the borough in terms of growth; and the extent to which local planning policy can play a part at attaining the SA Objectives. For example, the effects of the DRLLP PSV 2020 on SA Objective 2 – promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health – was assessed to result in significant positive effects to the borough. Obviously health is influenced by a number of other, more direct factors and organisations, such as hospitals, the NHS and individual lifestyle choices; but it was considered that the extent to which the DRLLP PSV 2020 can play a role in attaining SA Objective 2, should lead to significant positive effects.

6.25 For some of the SA Objectives, the DRLLP SPV 2020 has resulted in uncertain effects. These primarily relate to deliverability both of necessary infrastructure to support projected growth (especially transport infrastructure such as timing of Northern Line extension, new station at Brixton and/or Loughborough Junction for the London Overground, improved step-free access at several stations, platform lengthening at Wandsworth Road, delivery of Healthy Networks Route, some health infrastructure, some public realm improvements), but also with respect to other growth and investment in the borough under the current difficult economic climate and the current uncertainty on Brexit negotiations. There are also uncertainties on whether proposals will be built out to how they are designed (often there is a

significant shortfall, particularly relating to the more environmental indicators such as achieving the designed reductions in carbon emissions and water use, and improvements to air quality and biodiversity for example). Uncertainties arise around the fact that the success of environmental policies is dependent upon implementation, attitude and behavioural use of occupiers, ambitiousness sought by developer/secured by the council (including the rigour to which policies are applied at the planning application stage), and enforcement.

Conclusion

- 6.26 Taking into account the findings of the SA, it is considered that the Revised Lambeth Local Plan Proposed Submission Version 2020 sets out a positive framework for the future development of Lambeth, in light of the London Plan requirements assigned to the borough. It is considered that the Revised Lambeth Local Plan Proposed Submission Version 2020 successfully achieves a balance between the need to protect the natural environment, with meeting social and economic needs.
- 6.27 The DRLLP PSV 2020 aims to achieve high standards in the quality of development and contains many provisions that seek to mitigate or avoid negative effects on the natural environment. It is considered that the impacts of the scale, type and level of development proposed in the DRLLP PSV 2020 will not give rise to significant adverse effects on biodiversity, landscape, historic environment and natural resources, due to the protective nature of policies that avoid or mitigate significant adverse effects.
- 6.28 It is considered that increases in carbon emissions and water use associated with increased population growth need to be weighed and considered against the social and economic benefits that growth brings to the borough. Positive social and economic effects such as improved health and well-being, reduced inequalities, prosperity and wealth, sense of belonging and community identity need to be considered holistically against relative increases in emissions, taking into account mitigation measures that seek to reduce the amount of emissions and increased prevalence of green technologies, including new future technologies and the mainstreaming of existing technologies that support environmental objectives into new and refurbished developments. DRLLP SPV 2020 policies seek to minimise effects associated with projected growth. Generally, the SA found that the DRLLP PSV 2020 policies aspire to achieve significant positive social, environmental, health and economic effects and avoid or mitigate potential significant adverse effects.
- 6.29 Overall, it is considered that the DRLLP PSV 2020 provides a spatial and policy framework that is largely in accordance with sustainable development principles, but with a small number of areas where it is uncertain whether sustainability objectives will always be achieved and infrastructure will be delivered in a timely manner. However the current political steer to address Lambeth's climate emergency is a positive move towards better ensuring future developments deliver on the DRLLP PSV environmental and sustainable design and construction policies.