

# Lambeth Local Plan Review

## Sustainability Appraisal

## Issues and Reasonable Alternatives

October 2017

<b>Contents Page</b>	<b>PAGE #</b>
<b>INTRODUCTION</b>	<b>3</b>
Background	3
Purpose of the Sustainability Appraisal	3
This Report	4
<b>METHODOLOGY OF THE ISSUES ASSESSMENT PROCESS</b>	<b>4</b>
The Five Stages of Appraisal	4
Assessing the Issues and Reasonable Alternatives	13
<b>RESULTS OF THE ISSUES ASSESSMENT PROCESS</b>	<b>13</b>
Technical difficulties/assumptions made during this assessment	13
Summary of the Results	13
<i>Topic 1 – Housing Growth</i>	14
<i>Topic 2 – Affordable Housing</i>	18
<i>Topic 3 – Housing for Older People</i>	22
<i>Topic 4 – Self-build and custom housebuilding</i>	23
<i>Topic 5 – Business and Jobs</i>	24
<i>Topic 6 – Town Centres</i>	26
<i>Topic 7 – Hotels and Visitor Accommodation</i>	29
<i>Topic 8 – Improving Air Quality</i>	31
<i>Topic 9 – Waste</i>	33
<i>Topic 10 – Transport</i>	34
<b>APPENDIX 1 – FULL SUSTAINABILITY APPRAISALS OF ISSUES AND REASONABLE ALTERNATIVES</b>	<b>36</b>
<i>Topic 1 – Housing Growth</i>	36
<i>Topic 2 – Affordable Housing</i>	70
<i>Topic 3 – Housing for Older People</i>	99
<i>Topic 4 - Self-build and custom housebuilding</i>	103
<i>Topic 5 – Business and Jobs</i>	113
<i>Topic 6 – Town Centres</i>	130
<i>Topic 7 – Hotels and Visitor Accommodation</i>	150
<i>Topic 8 – Improving Air Quality</i>	163
<i>Topic 9 – Waste</i>	173
<i>Topic 10 – Transport</i>	179

## 1. INTRODUCTION

### Background

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

The preparation of the Lambeth Local Plan Review is being subject to an integrated sustainability appraisal (SA) and strategic environmental assessment (SEA) in line with the requirements of:

- The Environmental Assessment of Plan and Programmes Regulations 2004 (which requires an environmental assessment to be carried out on certain plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment); and
- The Planning and Compulsory Purchase Act 2004 and National Planning Policy Framework (which requires sustainability appraisal of all emerging Local Plans and Supplementary Planning Documents).

This appraisal also assesses the potential impacts of proposed policy approach on equality and health and well-being. 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 options on different equalities groups (i.e race, gender, disabilities, lesbian/gay/bisexual/transgender, age, faith communities etc). For example, whilst SA objective 5 specifically addresses issues of equality and diversity, other objectives also tease out equality impacts via appropriate sub questions. Similarly, health and well-being impact assessment is integrated into the SA.

### Purpose of the Sustainability Appraisal

The purpose of the sustainability appraisal is to promote sustainable development by integrating sustainability considerations into the plan making process. This is done through a number of stages:

- The production of a SA Scoping Report (produced in August 2016), which examined the sustainability issues in the area. The issues identified in the scoping report were used to produce a sustainability appraisal framework against which the plan can be measured. Comments on the scoping report were sought from the three statutory bodies (Historic England, Natural England and Environment Agency) and comments were received from Natural England and the Environment Agency with a late response from Historic England in 2018. The scoping report was amended in response to their comments. The final scoping report can be accessed online and is also published alongside the suite of consultation materials on the Lambeth Local Plan Review.
- The production of an issues and options assessment report (this report) which outlines the results of the sustainability appraisal of the reasonable alternatives identified to tackle each

of the areas being addressed as part of the Local Plan Review. The key issues to be considered in the partial review are: 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 are explored through a series of topic papers and questions, with links to further evidence where relevant. The topic papers identify different possible ways (reasonable alternatives) of addressing the key issues. This report appraises the reasonable alternatives identified in the topic papers/online surveys against the sustainability objectives that were developed as part of the Scoping Report process.

- The next stage of the SA will be the appraisal of the preferred approach to tackle the key issues. This will be the formal SA report under the terms of the SEA Regulations and will be the first initial appraisal of the draft Lambeth Local Plan.

### **This Report**

The purpose of SA is to integrate social, economic and environmental sustainability considerations into plan making. In order to do this, it is necessary for plan makers to be aware of the implications of their decisions as early as possible in the plan making process. Assessing issues and reasonable alternatives to address those issues helps to ensure that sustainability considerations are integrated into plan making at the earliest states. Therefore, the purpose of this report is to outline the sustainability effects of the issues and options in order to guide the plan makers as they write the new draft Lambeth Local Plan.

This document presents the findings of the sustainability appraisal of the alternatives identified for addressing key issues of the different topic areas being dealt with in the Local Plan Review.

## **2. METHODOLOGY OF THE ISSUES ASSESSMENT PROCESS**

### **The Five Stages of Appraisal**

There are five stages (A to E) to SA, shown in the diagram below (figure 1). The diagram also sets out the local plan process that occurs simultaneously.

This report addresses the second stage of the process – Stage B in Figure 1. Stage A was addressed through the Scoping Report prepared in 2016. The sustainability appraisal framework (see table 1) was developed during the scoping report process. The various options for addressing the key issues have been assessed against this sustainability framework. The results of this work are set out in Appendix 1.

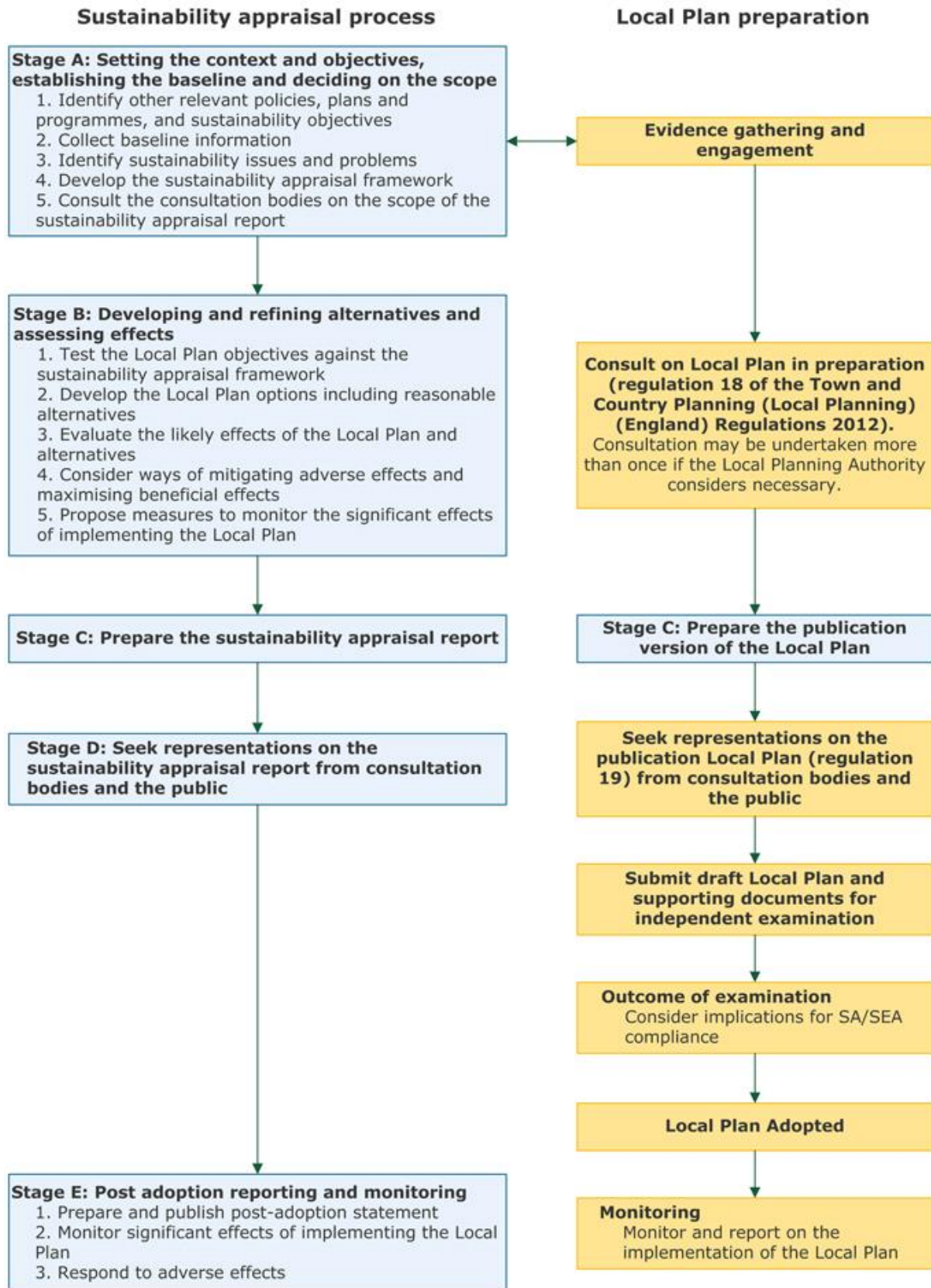


Figure 1: Stages of the SA and Local Plan processes

**Table 1: General SA framework proposed for Local Plan Review**

A Objective	Appraisal prompt questions and targets	Targets
<b>SOCIAL</b>		
<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"> <li>• reduce the opportunities to commit crime and engage in antisocial behaviour?</li> <li>• help address the fear of crime as well as crime itself?</li> <li>• create the conditions for communities to develop which will support a reduction in crime and the fear of crime?</li> <li>• reduce Lambeth’s vulnerability to major challenges such as climate change and water shortages?</li> <li>• reduce Lambeth’s vulnerability to terrorist action?</li> <li>• reduce the need for motorised travel?</li> <li>• encourage walking and cycling, for instance by reducing traffic accidents to pedestrians and cyclists?</li> </ul>	
<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"> <li>• protect health and wellbeing?</li> <li>• reduce poverty, including child poverty and the impact of income inequality?</li> <li>• help reduce health inequalities?</li> <li>• help improve mental, emotional and physical health, and wellbeing?</li> <li>• encourage the development of healthy neighbourhoods?</li> <li>• make walking and cycling more attractive relative to other alternatives?</li> <li>• improve access to health care services?</li> <li>• help people be healthier, for longer</li> <li>• help people to live an inclusive and active lifestyle?</li> <li>• promote a sense of wellbeing?</li> </ul>	<p>London Plan performance indicator: 6 Reducing Health Inequalities <i>Reduction in the difference in life expectancy between those living in the most and least deprived areas of London (shown separately for men and women).</i></p>
<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"> <li>• 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"> <li>• Schools</li> <li>• Nurseries</li> <li>• GPs and hospitals</li> <li>• Libraries</li> <li>• Places of worship</li> <li>• Food shops (especially those selling fresh, healthy food)</li> <li>• Community centres</li> </ul> </li> </ul>	

	<ul style="list-style-type: none"> <li>• Children’s play areas</li> <li>• Sports and recreation facilities</li> <li>• Open spaces and wildlife habitats</li> <li>• Police and emergency services</li> <li>• Banking facilities and post offices</li> <li>• help older, disabled and vulnerable people live independently and have control over their lives?</li> <li>• help vulnerable children and adults get support and protection?</li> </ul>	
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"> <li>• Ensure that appropriate infrastructure keeps pace with population growth, in particular: <ul style="list-style-type: none"> <li>○ water and sewerage infrastructure</li> <li>○ health ‘infrastructure’ (facilities and services)</li> <li>○ schools</li> <li>○ green infrastructure</li> <li>○ flood defences</li> <li>○ transport.</li> </ul> </li> </ul>	<p>London Plan KPI 12: Improving the provision of social infrastructure and related services. <i>Reduce the average class size in primary schools</i></p>
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"> <li>• promote a culture of equity, fairness and respect for people and the environment?</li> <li>• improve environmental conditions for Lambeth’s deprived areas and deprived communities?</li> <li>• reduce poverty and social exclusion?</li> <li>• Remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination?</li> <li>• promote social cohesion within and between population groups?</li> <li>• enable social integration between minority groups and wider society?</li> <li>• address housing, cultural, social and employment needs of those with protected characteristics?</li> <li>• promote adequate accessibility, in particular for older and disabled people?</li> </ul>	<p>London Plan KPI 11: Increased employment opportunities for those suffering from disadvantage in the employment market <i>Reduce the employment rate gap between BAME groups and the white population and reduce the gap between lone parents on income support in London vs England &amp; Wales average</i></p>
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"> <li>• increase access to good housing?</li> <li>• promote increased supply of housing?</li> <li>• Increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)?</li> <li>• meet affordable housing targets?</li> <li>• meet sustainable housing standards?</li> </ul>	<p>London Plan KPI 4: Increase the supply of new homes <i>Average completion of a minimum of 42,000 net additional homes per year</i></p> <p>London Plan KPI 5: An increased supply of affordable homes</p>

	<ul style="list-style-type: none"> <li>• increase the mix and type of housing, including family units?.</li> <li>• reduce actual noise levels and disturbances from noise?</li> <li>• tackle homelessness and overcrowding?</li> <li>• provide housing that ensures a good standard of living and promotes a healthy lifestyle?</li> <li>• provide Lambeth residents with more opportunities for better quality homes?</li> </ul>	<p><i>Completion of 17,000 net additional affordable homes per year</i></p> <p>London Plan borough housing target for Lambeth: 1559 per annum (minimum target)</p> <p>Minimum targets set for Opportunity Areas employment capacity and minimum homes: Vauxhall, Nine Elms, Battersea: 20,000 new homes Waterloo: 2,500</p> <p>Lambeth Sustainable Community Strategy (2008-2020): Aiming to achieve the council's policy for 50% affordable housing with subsidy and 40% without subsidy wherever possible in development proposals</p>
<p>7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> <li>• protect and enhance the quality and quantity of open space and the public realm?</li> <li>• reduce the proportion of the public realm where noise precludes conversation or where other environmental factors (e.g. fumes) make it unpleasant to be?</li> <li>• promote community engagement?</li> <li>• promote interactions between different sectors of the community?</li> <li>• promote good governance?</li> <li>• promote wellbeing and help to make people feel positive about the area where they live?</li> <li>• promote child-friendly buildings and places?</li> <li>• promote Lambeth as a place that people want to put down roots rather than just pass through?</li> <li>• support the provision of quality, affordable and healthy food?</li> <li>• help all Lambeth communities feel they are valued and are part of their neighbourhoods?</li> <li>• encourage people to take greater responsibility for their neighbourhood?</li> <li>• help people lead environmentally sustainable lives?</li> </ul>	
<b>ENVIRONMENTAL</b>		
<p>8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> <li>• protect sites, features and areas of historical, archaeological and cultural value/potential and their settings?</li> <li>• enhance the provision of cultural facilities (e.g. public art) and possibilities for cultural events/activities (e.g. festivals)?</li> </ul>	<p>London Plan KPI 3: Minimise the loss of open space <i>No net loss of open space designated for protection in LDFs due to new development</i></p>



<p>design and protection of open space, valued views and historic assets.</p>	<ul style="list-style-type: none"> <li>• respect visual amenity and the spatial diversity of communities?</li> <li>• aspire to a range of buildings and architecture that reflect the cultural diversity of the borough?</li> <li>• protect and enhance the townscape/cityscape character, including historical, archaeological and cultural value/potential and its contribution to local distinctiveness?</li> <li>• increase access to, enjoyment of and understanding of, historical, archaeological and cultural sites, features and areas?</li> <li>• protect, enhance or create open space?</li> <li>• protect valued views?</li> <li>• identify locations where tall building are acceptable?</li> </ul>	<p>London Plan KPI 24: Protecting and improving London's heritage and public realm <i>Reduction in the proportion of designated heritage assets at risk as a percentage of the total number of designated heritage assets in London</i></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"> <li>• reduce overall need for people to travel by improving their access to local services, jobs, leisure and amenities.</li> <li>• 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)?</li> <li>• encourage greater efficiency in the transport network, such as through higher load factors?</li> <li>• integrate new development, especially residential development, with sustainable transport choices?</li> <li>• improve accessibility to work by public transport, walking and cycling?</li> <li>• reduce road traffic accidents, especially involving cyclists?</li> </ul>	<p>London Plan KPIs 13, 14, 15, 16: Achieve a reduced reliance on the private car and a more sustainable modal split for journeys <i>13 - Use of public transport per head grows faster than use of private car per head</i>  <i>14- Zero car traffic growth for London as a whole</i>  <i>15 - Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026.</i>  <i>16 - A 50 per cent increase in passengers and freight transported on the Blue Ribbon Network from 2011-2021</i></p> <p>London Plan KPI 17: Increase in the number of jobs located in areas with high PTAL values <i>Maintain at least 50 per cent of B1 development in PTAL zones 5-6</i></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"> <li>• 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)?</li> <li>• Improve the quality and extent of designated and non-designated sites?</li> <li>• protect and enhance access to open space and improve the quality of publicly accessible green space?</li> </ul>	<p>London Plan KPI 18: Protection of biodiversity habitat <i>No net loss of designated Sites of Importance for Nature Conservation</i></p> <p>London Plan KPI 22: Increase urban greening <i>Increase the total area of green roofs in the CAZ</i></p>

	<ul style="list-style-type: none"> <li>• 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?</li> <li>• encourage replacement of valuable lost habitat?</li> <li>• bring nature closer to people, i.e. help conserve local nature conservation amenity, including gardens?</li> <li>• provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)?</li> <li>• Improve access to areas of biodiversity interest?</li> <li>• Enhance the ecological function and carrying capacity of the green space network?</li> <li>• Promote a network of green infrastructure?</li> </ul>	
<p>11. Green infrastructure. To create, manage and enhance green infrastructure.</p>	<ul style="list-style-type: none"> <li>• protect existing green infrastructure or open spaces?</li> <li>• enhance/create good quality and accessible green infrastructure or open spaces?</li> <li>• promote increased access to green infrastructure where appropriate</li> </ul>	
<p>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>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> <li>• help minimise emissions of greenhouse gases?</li> <li>• increase the proportion of energy both produced and used from renewable and sustainable resources?</li> <li>• reduce demand and need for energy?</li> <li>• reduce the impacts of climate change? e.g. urban heat island effect, flooding and drought?</li> <li>• ensure adaptation to the future impacts of climate change?</li> <li>• help new and retrofitted development and infrastructure is located, designed and constructed to withstand the effects of climate change over its design life?</li> <li>• promote high quality, appropriate design and sustainable construction methods?</li> <li>• promote high standards of energy and environmental performance for new and existing buildings?</li> <li>• minimise embedded carbon in new buildings and development?</li> </ul>	<p>London Plan KPI 20: Reduce carbon dioxide emissions through new development <i>Annual average percentage carbon dioxide emissions savings for strategic development proposals progressing towards zero carbon in residential development by 2016 and zero carbon in all developments by 2019.</i></p> <p>London Plan KPI 21: Increase in energy generated from renewable sources Production of 8550GWh of energy from renewable sources by 2026.</p>
<p>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>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> <li>• improve the quality of water and waterbodies (surface and groundwater)?</li> <li>• reduce piped water consumption e.g. through reducing demand and encouraging recycling in households?</li> <li>• reduce waste water and sewage needing processing?</li> <li>• support sustainable urban drainage?</li> </ul>	<p>London Plan KPI 23: Improve London’s Blue Ribbon Network <i>Restore 15km of rivers and streams 2009–2015 And an additional 10km by 2020.</i></p>

	<ul style="list-style-type: none"> <li>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?</li> </ul>	
14. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> <li>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?</li> <li>make waste avoidance, reuse and recycling easy for residents and visitors?</li> <li>help develop markets for recycled products by using them?</li> <li>enable safe storage of waste and recycling, convenient for both residents and collectors?</li> <li>make appropriate provision for waste management facilities in the Borough to help meet the London Plan apportionment and self sufficiency targets?</li> </ul>	<p>London Plan KPI 19: Increase in municipal waste recycled or composted and elimination of waste to landfill by 2026 <i>At least 45 per cent of waste recycled/composted by 2015 and 0 per cent of biodegradable or recyclable waste to landfill by 2026.</i></p> <p>London Plan borough apportionment for Lambeth: 220,000 tonnes per annum by 2036 (municipal solid waste and commercial/ industrial waste). Lambeth current existing capacity: 92,000 tonnes pa.</p>
15. Air quality. To improve air quality.	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> <li>improve air quality?</li> <li>reduce emissions of greenhouse gases?</li> <li>reduce emissions of PM10, NO2 and ozone depleting substances?</li> <li>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?</li> <li>support the planting of trees?</li> <li>promote the 'transport hierarchy'?</li> </ul>	
<b>ECONOMIC</b>		
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"> <li>improve opportunities and facilities for formal, informal and vocational learning (including volunteering) for all ages?</li> <li>contribute to up-skilling and to meeting skills shortages?</li> <li>promote healthy, sustainable living?</li> <li>Provide people with the skills to find work?</li> </ul>	
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>Will the strategy/policy...</p> <ul style="list-style-type: none"> <li>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?</li> <li>support employment opportunities in the most deprived areas and groups and stimulate regeneration?</li> </ul>	<p>London Plan KPI 8: Ensure that there is sufficient development capacity in the office market. <i>Stock of office planning permissions to be at least three times the average rate of starts over the previous three years</i></p>

<p>This should also support the development of an efficient, low carbon economy (including new green technologies) that minimise unsustainable resource use.</p>	<ul style="list-style-type: none"> <li>• enable people to live better for a given income by reducing their need for paid goods and services?</li> <li>• contribute to sustainable tourism?</li> <li>• support development of green industries and a low carbon economy?</li> <li>• support and prevent loss of local businesses?</li> <li>• encourage business start-ups and support the growth of businesses?</li> <li>• Help Lambeth play s strong role in London’s economy?</li> </ul>	
<p>18. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings, taking into account constraints such as contaminated land.</p>	<p>Will the strategy/policy...</p> <ul style="list-style-type: none"> <li>• have benefits to the most deprived areas and communities?</li> <li>• help make people feel positive about the area they live in?</li> <li>• help reduce the number of vacant and derelict buildings?</li> <li>• make best use of scarce land resources and reuse brownfield sites?</li> <li>• promote the efficient, innovative and multifunctional use of land?</li> <li>• ensure the provision of adequate quantities and type of public realm?</li> <li>• protect the Borough’s soil resource?</li> </ul>	<p>London Plan KPI 1: Maximise the proportion of development taking place on previously developed land. <i>Maintain at least 96 per cent of new residential development to be on previously developed land</i></p> <p>London Plan KPI 2: Optimise the density of residential development <i>Over 95 per cent of development to comply with the housing density location and the density matrix</i></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"> <li>• improve accessibility to employment, especially for local people?</li> <li>• improve employment opportunities among Black, Asian, Ethnic and Minority groups?</li> <li>• protect local employment land and uses?</li> <li>• provide additional housing near places of work?</li> <li>• Help people achieve financial security?</li> <li>• Help all young people have opportunities to achieve their ambitions</li> </ul>	<p>London Plan KPI 7: Sustaining economic activity <i>Increase in the proportion of working age London residents in employment 2011–2031</i></p> <p>London Plan KPI 9: Ensure that there is sufficient employment land available <i>Release of industrial land (B2/B8 use over 1,000 sqm) to be in line with benchmarks in the Industrial Capacity SPG</i></p> <p>Indicative employment capacity set for Opportunity Areas Vauxhall, Nine Elms, Battersea: 25,000 Waterloo: 15,000</p>

### **Assessing the Issues and Reasonable Alternatives**

The Lambeth Local Plan Review focuses on ten key topics. Each topic has a range of issues that need addressing. All of the issues have a number of reasonable alternatives (options) attached to them that seek to tackle the issue. This SA appraises all of those options. The aim of this process is to assist in the selection of the preferred options. Once the preferred options have been selected they will be assessed in more detail. The ten key topics are:

Topic 1: Housing growth and infrastructure

Topic 2: Affordable housing

Topic 3: Housing for older people

Topic 4: Self build housing

Topic 5: Business and jobs

Topic 6: Town centres

Topic 7 Hotels and visitor accommodation

Topic 8: Improving air quality

Topic 9: Waste

Topic 10: Transport

### **3. RESULTS OF THE ISSUES ASSESSMENT PROCESS**

#### **Technical difficulties/assumptions made during the assessment**

The principal source of difficulty undertaking the SA is the reliance on the judgement of predicting and assessing effects. The assessment has been undertaken by a professional with experience in town planning and sustainability issues. Consultation on the assessment of options will add value to the process through the views of other 'experts' and interested stakeholders which will provide alternative opinions for further scrutiny.

#### **Summary of the Results**

The full results of the appraisal are provided in Appendix 1. A summary of the results for each of the ten topics and their respective issues, is below.

## Topic 1 – Housing Growth

<b>Issue 1 – Managing Housing Growth</b>
<p>Reasonable Alternatives:</p> <ol style="list-style-type: none"> <li>1. Release a limited amount of industrial land to allow for mixed use development that allows for new housing and workspace</li> <li>2. Encourage higher density developments in town centres and in locations with good access to public transport</li> <li>3. No change to current policy position</li> </ol>
<p>SA conclusion:</p> <p>By releasing a limited amount of industrial land to allow for mixed use development, option 1 could make better, more efficient use of land and facilitate the delivery of a wider range of workspaces. High density developments in town centres and in locations with good public transport links (option 2) could help to improve access to key services, facilities and jobs, thereby potentially reducing the need to travel. Option 2 could also increase proximity to public transport modes and so encourage a reduction in car use in Lambeth (with associated air quality benefits). In comparison to option 3, both options 1 and 2 have the potential to deliver more homes and more affordable homes, and in a more sustainable way particularly if KIBAs are underperforming and have been for some time.</p> <p>Sustainable transport schemes will need to be incorporated into new mixed use schemes that come forward on former industrial land. KIBAs released for housing should ideally be located in areas with good public transport accessibility. The council should seek to minimise negative impacts arising from housing in close proximity to industrial uses. Generally, locations for new housing needs to be carefully considered in relation to the existing levels of pollution and air quality. Some KIBAs will be more suited to housing than others in terms of providing residential amenity and it is those KIBAs that should be considered for release, assuming evidence suggests KIBA designation is no longer needed to protect employment land in that location.</p>
<b>Issue 2 – Quantity vs Quality of housing</b>
<p>Reasonable Alternatives:</p> <ol style="list-style-type: none"> <li>1. Relax the requirement for private gardens and balconies in new blocks of flats to enable more housing to be provided</li> <li>2. Support the development of blocks with very small flats/rooms with shared living spaces, much smaller than the current minimum standards for the size of new housing, to increase the number of new, more affordable homes for younger people</li> <li>3. The Council will require minimum external amenity space for all residential units (no change to current position)</li> </ol>
<p>SA conclusions:</p> <p>Both options 1 and 2 could increase the overall number of homes in Lambeth however this uplift could come at the cost of amenity space (option 1) or internal space (option 2). Option 2 will however result in the delivery of homes that are likely to be more affordable and these can help to reduce housing inequalities, although it is recognised that the type of housing offered under option 2 will not be appealing for all people or indeed all younger people but may be appealing to some, particularly if it helps people to own their own home. Effects on health and wellbeing of option 2 are considered uncertain. There are long term uncertainties around whether option 2 will provide housing that people truly want to live in.</p> <p>Option 3 will provide minimum amounts of internal space and amenity space for future residents. This is likely to reduce the likelihood of residents experiencing any negative impacts on mental well-being and result in more gardens across the borough overall - these spaces can aid</p>

residents' health, increase schemes' green infrastructure provision, enhance biodiversity and improve the attractiveness of the built environment.

Development proposals would need to demonstrate access to sufficient communal outdoor space to mitigate adverse effects on health and wellbeing and provide more equitable outcomes for all communities (it is considered more likely that units delivered under option 2 would be cheaper and therefore more likely enticing by more vulnerable/lower income groups). Option 3 ensures minimum levels of amenity space and so helps to deliver more equitable outcomes for all communities. Overall, it is considered more likely that more long-term positive effects on SA objectives 2, 5, 10, 11, 12, and 13 would result from option 3 than options 1 or 2.

Should option 2 be progressed, it is recommended sufficient outdoor communal open space is provided. The amount of open space provided will need to be commensurate to the number of units delivered/number of occupiers expected.

### **Issue 3 – Student Housing in Vauxhall**

Reasonable alternatives:

1. Restrict further student housing in Vauxhall to allow more general needs housing alongside businesses and jobs
2. Allow student housing schemes, that accord with applicable policies set out in the development plan, in areas with good public transport access, and easy access to local shops, work places, services and community facilities (no change to current position)

SA conclusions:

Option 1 could help to deliver more homes and jobs in Vauxhall, an area with excellent public transport. Therefore this option can increase the amount of and access to employment generating activities. Option 1 has the potential to result in the delivery of a greater number of conventional residential developments in Vauxhall to meet current and future demands. Further, general needs affordable housing is not currently sought alongside student housing developments, therefore option 1 is likely to have a positive impact through the delivery of more affordable homes. However, it is also likely to result in fewer student units being provided. Option 2 allows student accommodation in the district centre which could increase its skilled work base, enhance its customer base and possibly help attract new businesses to Vauxhall. However it may limit the scope to develop other uses i.e. housing, business and jobs in Vauxhall and so may not benefit the wider population to the same extent as option 1.

### **Issue 4 – Build to Rent**

Reasonable alternatives:

1. Support the principle of Build to Rent borough-wide?
2. Support Build to Rent schemes only in particular locations or types of sites?

SA conclusions:

It is not known where in the borough Build to Rent schemes will be delivered through option 1 therefore it is difficult to assess the potential effects of this policy option on some of the SA objectives. By contrast, option 2 encourages Build to Rent (high density) schemes in particular locations, for example, in town centres or in locations with good public transport links. As such option 2 could help to improve access to key services, facilities and jobs, providing more easy access to these services and also reducing the need to travel. Option 2 could also improve proximity to public transport modes and so encourage a reduction in car use in Lambeth, with associated benefits on air quality. However, option 2 does limit the choice of potential 'build to rent' tenants in terms of location. Build to rent offers a more long-term rental opportunity for tenants. Some may prefer to put down family roots/establish their sense of place in more suburban areas of the borough, rather than town centres and/or opportunity areas earmarked for significant development. Some tenants may prioritise proximity to large parks and open

spaces over proximity to high streets. Overall, it is considered important to locate build to rent schemes in areas with 'good' or higher public transport accessibility level ratings.

Sustainable transport schemes will need to be incorporated into new build to rent schemes that come forward in areas of the borough with lower levels of public transport accessibility. Alternatively, it may be appropriate to adapt option 1 so build to rent schemes may be encouraged borough-wide but in areas of 'good' or better PTAL rating. This may result in more positive effects overall.

#### **Issue 5 – Family Homes**

1. Continue to protect family homes from conversions to flats in streets under conversion stress (No change from current position)
2. Allow conversion of family homes to flats to increase overall supply of housing in Lambeth

##### SA conclusions:

Option 1 will protect family homes in Lambeth that are located on streets under conversion stress. This option will not increase Lambeth's housing supply however it will better enable more families to live in the borough and that could mean that communities develop more sustainably over longer periods of time. Option 2 on the other hand is likely to increase the borough's overall supply of homes and this could benefit the wider economy. However families could be forced to live elsewhere if there is not a sufficient supply of family sized units. Overcrowded housing does not enable enjoyment of the home. Also, allowing unmanaged conversions of family dwellinghouses may result in more vehicles parking on residential streets and other negative impacts on local amenity, such as increased numbers of outdoor bins.

#### **Issue 6 - Gypsy and Traveller Sites**

##### Reasonable Alternatives:

1. Meet need for gypsy and traveller accommodation on the existing site in Streatham Vale.
2. Not meet future need for gypsy and traveller accommodation in Lambeth.

##### SA conclusions:

By meeting the need for gypsy and traveller accommodation on the existing site in Streatham Vale, Lambeth will not have to rely on sites outside of the borough to meet its need and therefore it can better ensure high quality accommodation for gypsies and travellers. Option 1 could also benefit the Lambeth economy by increasing the number of customers in Lambeth and by potentially increasing the size of its workforce. However this option could also increase pressure on existing infrastructure within Lambeth such as transport, water supplies and waste management. By meeting the need outside of the borough, Lambeth will have less control over how the need is met and existing communities and/or extended family may have to move away from the Streatham Vale site. This could potentially harm social cohesion and Lambeth's ability to develop strong and sustainable communities however demand of Lambeth's existing infrastructure networks are likely to be less affected.

It is noted that the land supply assessment concluded that no suitable, available and achievable alternative site in Lambeth exists for gypsy and travellers, and this is why an alternative site in Lambeth is not considered a reasonable alternative.

#### **Issue 7 - Green Infrastructure**

##### Reasonable alternatives:

1. Seek more green infrastructure through new developments
2. Not seek more green infrastructure through new developments (no change to current policy)

##### SA conclusions:

By seeking more green infrastructure through new development the borough is likely to benefit environmentally as green infrastructure provision could increase, air quality would likely improve and biodiversity levels could be enhanced. In turn option 1 could also help to provide more



places for people to meet, socialise and exercise and so reduce social exclusion and better ensure sustainable healthy lifestyles. Green infrastructure provides a number of health and wellbeing benefits, even if it is not physically accessible (eg views of greenery improve health). Option 1 could also help to bring nature closer to people. Green infrastructure can be delivered in a number of different ways (eg green walls, green roofs) that need not take space that could be otherwise used. Indeed there are many benefits of green infrastructure and the way in which it can underpin the success of economic sectors, offering an improved environment, jobs, sustainable business enterprises, social benefits, economic security and cost savings. These savings include a reduced need for healthcare, better employee productivity and better adaptation for climate change. Therefore any viability assessment that suggests delivery of more green infrastructure on-site hinders development should be closely scrutinised. Large new parks will not be deliverable, but a balancing act between development and green infrastructure should certainly be met.

More positive effects on SA objectives 2, 5, 7, 8, 9, 10, 11, 12, 13 and 15 are more likely to result from option 1 as compared to option 2.

## Topic 2: Affordable Housing

<b>Issue 1 - Threshold approach to affordable housing</b>
<p>Reasonable Alternatives:</p> <ol style="list-style-type: none"> <li>1. Do not test the financial viability of the scheme where the development provides at least 35% affordable housing on site and all other aspects of affordable housing policy are met.</li> <li>2. If any aspect of Local Plan policy on affordable housing is not met, development viability must be tested (no change to current approach).</li> <li>3. Lambeth should introduce a higher than 35% affordable housing threshold for Fast Track Route applications on industrial land released for housing.</li> </ol>
<p>SA conclusions:</p> <p>Option 1 allows schemes where the development provides at least 35% affordable housing on site and all other policy requirements are met to follow the 'Fast Track Route'. This may help to provide developers with more certainty and could result in a shorter determination period for the planning application. A greater amount of affordable housing could be delivered this way by incentivising developers to meet the threshold rather than have lengthy negotiations around development viability. Option 1 is likely to result in positive effects on SA objectives 2, 3, 5, 6, 7, and 17.</p> <p>Option 3 could similarly introduce a 'Fast Track Route' on former industrial land albeit at a higher than 35% threshold and so could potentially expedite affordable housing delivery in the same way as option 1 and may also result in a higher proportion of affordable units. Subsequently a greater number of households, including those in the most deprived areas and communities, could have more opportunities to live in affordable accommodation in their neighbourhoods. This could result in cumulative health and financial benefits. If not designed and delivered in a sensitive and sustainable manner, option 3 may result in adverse effects on SA objective 5. Health impact assessments will need to demonstrate no negative effects on health from the previous industrial land use. Industrial sites close to existing services, facilities and infrastructure are preferred over other sites not accessible to these services. A criteria based approach is recommended for the release of industrial land to housing. Option 3 is likely to result in positive effects on SA Objectives 2 (subject to health impact assessment/mitigation), 3, 5 (subject to design and health mitigation), 6, 7 (subject to location), 17, 18 and 19.</p> <p>Option 2 will test development viability if any aspect of Local Plan policy on affordable housing is not met. Consequently it is possible that greater amount of affordable housing could be provided in each scheme, and/or off-site delivery or payments in lieu might be achieved. However, in recent years the Mayor's evidence shows this approach has resulted in just 15% on average of on-site affordable housing across London as a whole. Option 2 is likely to result in positive effects on SA Objectives 2, 3, 6, 7, and 17.</p>
<b>Issue 2 - Affordable Housing on small sites</b>
<p>Reasonable Alternatives:</p> <ol style="list-style-type: none"> <li>1. Require a financial contribution towards affordable housing from developments involving fewer than 10 homes, subject to viability</li> <li>2. Do not require a financial contribution towards affordable housing from developments involving fewer than 10 homes</li> </ol>
<p>SA conclusions:</p> <p><b>Conclusions</b></p> <p>By requiring a financial contribution towards affordable housing from developments involving fewer than 10 homes, subject to viability, option 1 has the potential to enable more affordable</p>

units to be delivered in the future across the borough. Option 1 is likely to result in positive effects on the achievement of SA Objectives 2, 3, 5, 6, 17, 18, and 19.

Option 2 does not require affordable housing contributions from schemes that may be able to afford them. In turn, option 2 could possibly result in sites capable of delivering more than 10 units being underdeveloped. For example, a developer could try and develop fewer than 10 homes on a site so that they do not have to pay towards affordable housing. Consequently the maximum number of homes that could be delivered on site may not result from option 2. Potential negative effects on the achievement of SA objectives 18, 5 and 6 may result.

### **Issue 3 - Affordable workspace vs affordable housing**

Reasonable Alternatives:

1. Prioritise affordable workspace for small businesses over affordable housing if it is not possible to provide both
2. Prioritise affordable housing over affordable workspace for small businesses if it is not possible to provide both

SA conclusions:

By prioritising the development of new affordable workspaces, small businesses should be better able to set up in Lambeth and moreover, existing small business could have more opportunities to grow. Therefore this option could better enable the development of strong and dynamic local economies and improve the social and environmental performance of businesses. Option 2 prioritises affordable housing and so has the potential to deliver a greater number of affordable homes in the borough which can help Lambeth to meet priority housing need.

Both options can produce positive effects on SA objectives 1, 2, 3, 5, 7 and 18. Option 1 is likely to result in more positive effects than option 2 on the local economy, whilst option 2 is likely to produce more positive effects than option 1 on the boroughs housing levels.

Some areas of the borough might benefit more from prioritising affordable workspace over affordable housing, and likewise, some areas may benefit more from prioritising affordable housing over affordable workspace. It is recommended that this is further explored.

### **Issue 4 - Tenure split in affordable housing**

Reasonable Alternatives:

1. Secure more affordable housing for those on the lowest incomes, even if this means securing less affordable housing overall
2. Secure more affordable housing overall but with a smaller amount for those on lower incomes

SA conclusions:

To ensure that everyone has the opportunity for an affordable decent home, Lambeth needs to deliver as many affordable units as possible. In purely quantitative terms option 2 would therefore appear likely to have a greater positive impact on providing housing. However, the relative 'affordability' of different tenures means that option 1 could better enable lower socio-economic groups in Lambeth to access housing.

Option 1 could potentially secure more affordable housing for those on the lowest incomes, even if this means securing less affordable housing overall. Consequently the most deprived communities could have more opportunities to find an affordable home in Lambeth. However option 1 could reduce the overall quantum of affordable housing produced on site and thus overall, reduce the ability of wider population to afford their own home. On the other hand, option 2 may secure more affordable housing overall but with a smaller amount for those on lower incomes and thus more people should benefit from this option. However the most deprived communities are likely to have fewer opportunities to be able to afford/rent their own

home and they are less likely to be able to afford to live in a higher proportion of the units provided.

Both options are likely to result in positive effects on SA objectives 2, 3 and 6. Option 1 is considered more likely to result in positive effects on SA objectives 5 and 18 than option 2.

#### **Issue 5 - Affordable housing in estate regeneration schemes**

Reasonable Alternatives:

1. Always require 50% affordable housing overall in a finished estate regeneration scheme (No change to current position)
2. Sometimes accept less than 50% affordable housing overall in order to deliver a higher proportion of affordable housing at council rents for those on the lowest incomes

SA conclusion:

Of the two options, option 1 is likely to secure more affordable housing overall in finished estate regeneration schemes, thus more households should benefit from this option. However option 1 may mean delivery of fewer genuinely affordable (i.e. council rent) homes for populations on the lowest incomes meaning the most deprived communities are likely to have fewer opportunities to be able to find an affordable home. On the other hand, option 2 could secure more affordable housing for those on the lowest incomes, even if this means securing less affordable housing overall. Consequently the most deprived communities may have more opportunities to find an affordable home.

Option 2 has the benefit of providing both some affordable housing, and some council rents housing for those on lowest incomes.

If Option 2 is progressed, policy makers could consider a minimum percentage of affordable housing for option 2. For example, 'sometimes accept less than 50% but not less than 35% of affordable housing overall in order to deliver a higher proportion of affordable housing at council rents'.

#### **Issue 6 - Type of affordable housing in PRS schemes**

Reasonable Alternatives:

1. Allow all affordable housing in PRS schemes to be intermediate affordable
2. Require social/affordable rented units in addition to 'intermediate' units in PRS schemes, where feasible and viable

SA conclusion:

Option 1 allows all affordable housing in PRS schemes to be intermediate affordable whereas option 2 also requires social/affordable rented units to be provided where feasible and viable. Consequently, option 2 is more likely to benefit those on the lowest incomes (who can also be more likely to experience discrimination, deprivation and social exclusion) as more homes are likely to be provided that they can afford to live in. Accordingly, option 2 offers more positive effects on a number of sustainability objectives (e.g. SA objectives 5, 6, 7, 18 and 19).

#### **Issue 7 - Affordable Housing Mix**

Reasonable Alternatives:

1. Require between 20% to 50% of new affordable units to be two bedroom units (No change to current position)
2. Increase the proportion of new affordable units required to be two bedroom units

SA conclusion:

Option 1 outlines current Local Plan policy which requires between 20-50% of new affordable units to be two bedroom units. Research suggests that the need for two bedroom affordable units is likely to increase over time. Option 2 proposes to increase the proportion of new

affordable two bedroom units delivered through new developments so it could lead to more equitable affordable housing outcomes for all households (SA objective 5) and better ensure that more people have the opportunity for an affordable decent home (SA objective 6).

#### **Issue 8 - Affordable Housing in Student Housing Developments**

Reasonable Alternatives:

1. Do not require affordable housing for the wider population in specialist student housing developments (No change to current position)
2. Require some affordable housing for the wider population in specialist student housing developments

SA conclusion:

Affordable housing is a key issue for the Lambeth Local Plan review, with a view to increasing delivery and helping to meet unmet housing need. Option 2 contributes more towards this goal than option 1. Overall, it is considered that more positive effects on SA objectives result from Option 2.

Further options that may be worth exploring are:

- To collect a financial contribution towards the delivery of off-site affordable housing;
- To seek affordable housing from developments providing housing to meet specific community needs and developments for hostels and houses in multiple occupation.

If option 2 is the preferred approach, the council would need to consider why student housing developments are required to contribute towards affordable housing targets but other types of non-conventional housing developments are not.

### Topic 3: Housing and Older People

#### **Issue 1 – Specialist Housing in Lambeth**

Reasonable alternatives:

1. Support specialist retirement housing for sale to encourage more affluent older people to down-size to smaller accommodation if they want to, to release larger family-sized homes
2. Exempt providers of specialist housing for older people from normal contributions to affordable housing and infrastructure
3. Encourage more semi-communal living as a way of preventing loneliness and isolation among older people.

SA conclusions:

Option 1 has the potential to provide specialist housing for older people and also enable more families to live in the borough by releasing family sized homes. This could help to diversify the age structure and benefit local businesses and the wider economy. If it is accepted that specialist housing providers should be exempt from having to pay developer contributions, this could also help to increase the number of specialist homes for older people in Lambeth and thus better enable the borough to meet current and future demands for older people's housing. However, this is also likely to result in less affordable housing to meet general needs being delivered. More semi-communal living could help to prevent loneliness and social isolation among older people which would contribute positively to health and wellbeing.

Methodology for determining contributions could be reviewed for older people's specialist housing, for example, a flat rate contribution or a calculation that would be less than that required from market housing. It is recommended alternative methods for a contribution are further explored for applicants of older persons housing.

## Topic 4: Self-build and custom housebuilding

<b>Issue 1 - Meeting demand</b>
<p>Reasonable Alternatives:</p> <ol style="list-style-type: none"> <li>1. Plan to meet the demand for plots for self-build and custom housebuilding generated by individuals and organisations that have a local connection to the borough (for example people who already live or work in the borough, or have a family connection).</li> <li>2. Plan to meet all demand for plots for self-build and custom housebuilding.</li> </ol>
<p>SA conclusions:</p> <p>Both options have the potential to impact positively on the SA objectives relating to housing, liveability and place, and built and historic environment. Although option 2 could potentially result in a higher number of self-build homes (if sufficient land is available), option 1 is considered most likely to deliver the greatest positive outcomes in terms of meeting local demand for housing. As this type of housing development tends to be undertaken at lower densities it may not always represent an efficient use of land. For this reason option 2, which could result in a higher delivery target for self-build and custom-build sites, has the potential to result in a greater negative impact on the SA objective relating to regeneration and the efficient use of land.</p> <p>If option 1 is taken forward, it is recommended that the Local Plan makes clear what is meant by a 'local connection', and how this will be determined.</p>
<b>Issue 2 – Density and self and custom-build housing</b>
<p>Reasonable Alternatives:</p> <ol style="list-style-type: none"> <li>1. Allow the development of sites for self and custom build housing only where this would make efficient use of land.</li> <li>2. Allow lower density development, where this comprises self and custom-build housing, as an exception to usual housing density policies.</li> </ol>
<p>SA conclusions:</p> <p>Both options have the potential to impact positively on the SA objectives relating to housing, liveability and place, and built and historic environment.</p> <p>Option 1 is considered most likely to positively impact on the achievement of the SA objective to make efficient use of land. This infers both developing at an appropriate density and exploring opportunities to improve land which is underutilised or in disrepair. Option 2 does not directly promote the efficient use of land, and has the potential to negatively impact on this SA objective.</p> <p>If option 1 is taken forward the policy will need to make clear what is meant by 'make efficient use of land' and how this will be determined.</p>

## Topic 5: Business and Jobs

<b>Issue 1 – Affordable Workspace</b>
<p>Reasonable alternatives:</p> <ol style="list-style-type: none"> <li>1. Provide affordable workspace at less than market rents to meet the needs of small businesses, particularly in the creative and digital industries, across the borough</li> <li>2. Provide affordable workspace at less than market rents to meet the needs of small businesses, through a targeted approach that focuses on specific types of sites</li> <li>3. Require developers of new business space to work with specialist affordable workspace providers (AWP) chosen by the council</li> <li>4. No change to current policy i.e. no specific requirements for affordable workspace</li> </ol>
<p>SA conclusions:</p> <p>Option 1 provides affordable workspace at less than market rents to meet the needs of small businesses across the whole borough whereas option 2 targets these spaces to specific sites. Businesses that make use of these spaces could then potentially benefit local communities by providing them with more local job opportunities. In turn such businesses could diversify the local economy. Option 3 could better enable developers to meet the requirements of small business, potentially resulting in local business growth by improving productivity for example. Options 1, 2 and 3 are likely to result in positive impacts on SA objectives 2, 5, 7, 16, 17, 18 and 19 which are much less likely under option 4. Options 1 and 2 probably provide more certainty of delivering affordable workspace in the borough. Option 4 does not propose any specific requirements for affordable workspace and so small/new businesses are not likely to benefit to the same extent as they might via the alternative options.</p>
<b>Issues 2 - Affordable workspace vs affordable housing</b>
<p>Reasonable alternatives:</p> <ol style="list-style-type: none"> <li>1. Prioritise affordable workspace for small businesses over affordable housing if it is not possible to provide both</li> <li>2. Prioritise affordable housing over affordable workspace for small businesses if it is not possible to provide both</li> </ol>
<p>SA conclusions:</p> <p>By prioritising the development of new affordable workspaces, small businesses should be better able to set up in Lambeth and moreover, existing small business could have more opportunities to grow. Therefore this option could better enable the development of strong and dynamic local economies and improve the social and environmental performance of businesses. Option 2 prioritises affordable housing and so has the potential to deliver a greater number of affordable homes in the borough which can help Lambeth to meet housing need. In turn, lower-socio economic groups could potentially have more opportunities to live in their own home.</p> <p>Both options can produce positive effects on SA objectives 1, 2, 3, 5, 7 and 18. Option 1 is likely to result in more positive effects than option 2 on the local economy, whilst option 2 is likely to produce more positive effects than option 1 on the boroughs housing levels.</p> <p>Some areas of the borough might benefit more from prioritising affordable workspace over affordable housing, and likewise, some areas may benefit more from prioritising affordable housing over affordable workspace. It is recommended that this is further explored, rather than implementing either of the options at a borough-wide level.</p>
<b>Issue 3 - Developer Contributions</b>
<p>Reasonable alternatives</p> <ol style="list-style-type: none"> <li>1. Allow a financial contribution to help provide new small business space elsewhere in the borough, if developers cannot provide new small business space to replace what space is lost when redeveloping a site</li> </ol>



<p>2. Do not allow a financial contribution from developers in place of providing replacement small business space (No change to current position)</p>
<p>SA conclusion:                  By allowing a financial contribution if developers cannot provide new small business space to replace what space is lost, option 1 could result in stock levels of local business space potentially decreasing. This could harm the local business growth and result in inequitable outcomes for local communities. However replacement business space funded through option 1 could be located in areas of the borough where there is the greatest demand / need for it or where it could be provided more affordably to occupiers. Consequently option 1 has the potential to more equally benefit all of Lambeth’s businesses, particularly if the existing space is not well used.</p> <p>It is considered that option 1 offers more flexibility. In the first instance business space should be replaced in redevelopments, but where this is not deliverable; a financial contribution can be sought to provide new small business space elsewhere in the borough. The council could pool contributions to provide new business space where there is demand. The council may also take the opportunity to offer such space as affordable workspace.</p> <p>It is recommended that an evidence based strategy is developed to demonstrate what areas of the borough and/or through what mechanisms new small business space can be funded by the financial contributions.</p>
<p><b>Issue 4 – Key Industrial Business Areas</b></p>
<p>Reasonable alternatives</p> <ol style="list-style-type: none"> <li>1. Do not amend current KIBA boundaries (No change to current position)</li> <li>2. Amend KIBA boundaries as proposed to allow potential for development involving a mix of small business space and housing in some locations.</li> </ol>
<p>SA conclusions:</p> <p>Option 1 will not amend the KIBA boundaries and so the same amounts of specific industrial/business space will be available for business to use and benefit from. These spaces are more affordable than other areas of the borough and so better enable business to grow.</p> <p>Option 2 proposes to reduce the overall amount of KIBA designated land available by amending the KIBA boundaries to enable new development involving a mix of small business space and housing (although it does include potential to designate some new KIBAs). This is likely to result in a reduction in options for some types of business that can only locate in industrial areas away from housing, which could be damaging to some sectors in the local economy. Conversely, it is likely that more homes and potentially more affordable homes will be created through this option. In turn business space lost through KIBA de-designation could be re-provided as part of the new development and so any loss of industrial/business floorspace could be mitigated through option 2. Provided Option 2 involves underperforming KIBAs and/or KIBAs in local environments conducive to enabling liveable residential areas, it is considered that positive effects can arise from option 2, particularly with regards to SA objectives 1, 3, 5, 6, 7, 8, 17, 18 and 19, but there could be negative effects on SA objectives 17 and 19.</p>

## Topic 6: Town centres

<b>Issue 1 - Betting offices and pay day loan shops</b>
<p>Reasonable alternatives:</p> <ol style="list-style-type: none"> <li>1. Limit the number of betting shops and pay-day loan shops that can be grouped together in one place</li> <li>2. Do not limit the number of betting shops and pay-day loan shops that can be grouped together in one place</li> </ol>
<p>SA conclusions:</p> <p>By limiting the number of betting shops and pay-day loan shops that can be grouped together in one town centre, option 1 could provide more opportunities for other town centre uses - such as retail, and food and drink uses, leisure and social facilities - to develop. Overall, option 1 is likely to result in more positive effects on a number of SA Objectives, particularly on built environment, liveability, crime and safety, and local economy. Option 2 is more likely not to achieve such positive effects.</p> <p>Option 2 could result in an overconcentration of betting shops and pay-day loan shops and potentially harm the vitality and viability of town centres. It could also reduce the attractiveness of places which may become less appealing to existing businesses and/or businesses who may be looking to set up and grow in Lambeth. Consequently option 2 could reduce footfall and harm the viability of other retail uses and business in town centres. Groups that are drawn to betting shops and pay-day loan shops may also be further negatively impacted upon if there is a higher chance that they will develop gambling addictions or severe debt for example, which is likely to have adverse impacts on health and wellbeing and to adversely affect the most socially and economically deprived.</p>
<b>Issue 2 - A2 Uses in Lambeth</b>
<p>Reasonable alternatives:</p> <ol style="list-style-type: none"> <li>1. Limit the proportion of banks, building societies, estate agents and other 'financial and professional services' within town centres</li> <li>2. Do not limit the proportion of banks, building societies, estate agents and other 'financial and professional services' within town centres</li> </ol>
<p>SA conclusions:</p> <p>By limiting the proportion of banks, building societies, estate agents and other 'financial and professional services' within town centres, option 1 could enable more opportunities for other retail, leisure and social facilities to develop. Option 1 should also enable planners to better balance the mix of uses in town centres which could help to maintain the vitality and viability of town centres, attract new businesses to Lambeth and bring new jobs to the borough. Maintaining the provision of a good mix of key shops and services within town centres can reduce the need to travel. It is considered that limiting the proportion of A2 uses within town centres (option 1) may help to ensure a good mix of uses is maintained. However, banks, building societies etc also provide a key service; limiting the proportion of such uses may result in local residents having to travel further to access their bank or other services they require. Similarly limiting the proportion of such uses may result in shop premises remaining vacant, or a lack of such services within a particular area, which has the potential to undermine the vitality and viability of town centres. This could be mitigated if option 2 is taken forward.</p>

Option 2 could result in an overconcentration of A2 uses and so the mix of uses in town centres could potentially be harmed, although the evidence for this would need to be carefully assessed. This could reduce the attractiveness of centres and either encourage existing businesses to relocate, potentially outside of the borough, or spur new businesses to look elsewhere. Furthermore, an imbalanced mix of use has the potential to reduce footfall, and harm the viability of the wider centre, by reducing the overall number of customers who use the centre. It may also increase the need to travel to other centres and/or outside the borough.

Therefore both options have potential positive and negative impacts on this SA objective, although these are not considered to be significant. If option 1 is progressed, policy would need to clarify how limits are set to control A2 uses, taking account of current permitted development rights.

**Protecting A1 uses**

Reasonable alternatives:

1. Restrict permitted development rights for change of use from A1 to A2 in locations where this would harm the main shopping function of a town centre (through uncontrolled loss of A1 units)
2. Do not restrict permitted development rights for change of use from A1 to A2

SA conclusions:

Option 1 could enable Lambeth to better manage the mix of uses in town centres, and protect existing levels of A1 uses. A higher proportion of A1 units, and a balanced mix of uses in town centres can improve a centre’s viability and vitality helping to maintain the customer base, attract new businesses to the borough and maintain existing ones. A cumulative impact that could result from option 1 is more jobs. A good balanced mix also reduces the need to travel, makes places more interesting, and helps provide people with a sense of place and belonging. It is considered that option 1 could potentially result in positive impacts on SA objectives 3, 5, 7, 8, 9, 17, 18, and 19.

Option 2 could result in an overconcentration of A2 uses if change of use from A1 to A2 is not controlled, although this risk would need to be carefully assessed against evidence. Thus the mix of uses in town centres could be harmed reducing the attractiveness of town centres and either encourage existing businesses to relocate, potentially outside of the borough, or reducing the appeal of centres to potential new businesses. Furthermore, an imbalanced mix of use could potentially reduce footfall which has the ability to reduce the number of customers for existing town centre businesses. Conversely, this option potentially provides more flexibility to the market. Negative impacts on SA objectives 3, 7, 8 and 17 are considered possible under option 2, although there may also be positive impacts on objective 17.

**Pubs**

Reasonable alternatives:

1. Require applicants to demonstrate that a pub is no longer needed before a change of use to another A class use is allowed (No change to current position)
2. Do not require applicants to demonstrate that a pub is no longer needed before change of use to another A class use is allowed

SA conclusions:

Option 1 is likely to better enable planners to understand the existing role of pubs in the wider context of their local communities. Consequently planners should be able to decide which pubs constitute important local economic, social and cultural assets and potentially protect these assets from change of use through option 1. Positive effects on SA

objectives 3, 5, 7, 17 and 19 are expected from option 1. Positive effects may also result in terms of the built and historic environment, however, if a pub is underused or vacant or has become dilapidated overtime, option 2 could potentially expedite the change of use process and improve the quality, attractiveness, character and sustainability of the built environment through new development of high quality design.

Option 2 would not require applicants to demonstrate that a pub is no longer needed and therefore it could more easily result in change of use to another A class use. If the existing pub is underused, then the local environment could benefit from a change of use. However option 2 could result in the loss of assets that are valued by local communities. The loss of such assets without confirmation that they are not needed (as set out in option 2) is likely to detrimentally impact the local economy, reduce the social performance of businesses, increase social exclusion, reduce social cohesion and impact negatively on local jobs.

If option 1 is progressed it is recommended that guidance is provided that states what evidence is required from applicants in order for the council to be satisfied that a pub is no longer needed.

**Nightclubs**

Reasonable alternatives:

1. Protect nightclubs from changing to other types of use, where it can be demonstrated that they make a positive contribution to Lambeth’s culture and night-time economy and do not adversely affect residents and other businesses.
2. Do not protect nightclubs from change of use to other types of use

SA conclusion:

Option 1 is likely to better enable planners to understand the existing role of nightclubs in the wider context of Lambeth’s culture and night-time economy. Consequently planners should be more informed on which nightclubs have a positive contribution on Lambeth’s culture and night-time economy and that do not adversely affect residents and other businesses. In turn this option could then help to protect these assets from change of use. Option 1 is likely to result in positive effects on SA objectives 5, 17 and 19. Depending on operation of individual nightclubs, either positive or negative impacts might result from option 1 on SA objectives 1 (crime) and 7 (liveability).

Option 2 would not protect nightclubs from a change of use and so could result in the loss of assets that are culturally and economically significant. Consequently the provision and variety of local facilities could be harmed as could the local night time economy. However if the existing nightclub is underused and/or does not make a positive contribution to Lambeth’s culture and night-time economy then the local economy could benefit from a change of use.

## Topic 7: Hotels and Visitor Accommodation

<b>Issue 1 - Hotels and short-term lets</b>
<p>Reasonable alternatives</p> <ol style="list-style-type: none"> <li>1. Accept that short-term lets, like Airbnb and student housing in vacations, help to meet demand for visitor accommodation in Lambeth alongside hotels - and therefore limit the number of new hotel bedspaces that will be supported.</li> <li>2. Continue to support new hotel developments in appropriate locations across the borough (No change to current policy)</li> <li>3. Do not support any new hotels in the Waterloo area</li> </ol>
<p>SA conclusions</p> <p>Option 1 could better enable the council to strategically manage the mix of land uses across the borough by limiting the number of new hotels. This option still allows for a limited number of new hotel developments. Conversely option 3 is a more restrictive approach that would preclude new hotels from locating in Waterloo. Residential, office, retail and other commercial uses are likely to have more development opportunities through options 1 and 3. These options are more likely to have positive impacts on SA objectives 5 (equalities), 6 (housing), and 7 (liveability). Depending on landuse and implementation, all options have potential positive effects for the local economy/job opportunities. Should option 1 be progressed more clarity is recommended on whether or not hotels will be limited across the borough or in certain locations or once certain thresholds are met.</p> <p>Option 2 does not change current policy and so hotels would be supported in certain areas across the borough such as those with good public transport accessibility. By supporting new hotel development, visitor numbers are likely to increase and the wider economy could benefit. However alternative land uses could potentially benefit the economy more directly and help Lambeth to meet its housing and affordable housing need for example. A more restrictive approach could better ensure a balance of land uses in areas nearby to key public transport nodes, including Waterloo, and across the borough more widely. Although it is noted that existing local plan policy ED12 states that new visitor accommodation must not unacceptably harm the balance and mix of uses in the area, which helps avoid oversaturation of hotels in certain locations.</p> <p>Option 1 should outline whether or not hotels will be limited across the borough or in certain locations or once certain thresholds are met.</p>
<b>Issue 2 - Serviced Apartments</b>
<p>Reasonable alternatives:</p> <ol style="list-style-type: none"> <li>1. Manage the delivery of 'serviced apartments' across Lambeth through new Local Plan policy</li> <li>2. Do not manage the delivery of 'serviced apartments' across Lambeth - continue to treat on a case by case basis (No change to current position)</li> </ol>
<p>SA conclusions:</p> <p>By managing the delivery of serviced apartments, Lambeth is likely to have more strategic control over the delivery of these units. Option 2 does not manage their delivery and so higher numbers of these apartments could be created. Option 2 might have potential to harm the mix of uses and have wider cumulative impacts on the liveability and sustainability of local neighbourhoods. There may be concerns over the ability to control the long-term use of this type of accommodation, with a risk that it becomes a form of de facto permanent residential use without the benefits of normal design standards and affordable housing contributions.</p>

If option 2 is taken forward, to mitigate any potential harm to health and wellbeing and opportunities lost for provision of affordable housing, the council would need to ensure the serviced apartments were not going to be occupied as permanent residential accommodation.

### **Issue 3 - Employment, Training and Career Opportunities**

Reasonable alternatives:

1. Require large new hotels to provide high quality employment, training and career opportunities for Lambeth residents.
2. Make no distinction in the employment and skills requirements for large new hotels vs other types of major development (No change to current position)

SA conclusions:

By requiring large new hotels to provide high quality employment, training and career opportunities for Lambeth residents, the education and skill levels of the population could be enhanced by option 1. In turn this option could better enable lower-socio economic groups to gain rewarding, well located and satisfying jobs, and possibly improve the social performance of hotel businesses.

It is not clear whether both options 1 and 2 might apply at the same time. Other issues and alternatives being considered as part of the Local Plan Review include limiting the new hotel development. Should that policy approach be progressed; there will be effects on option 1 offered here regarding employment, skills and training. To maximise effects on SA Objective 16, it is considered that both options could be progressed.

To maximise effects on SA Objective 16 (education and skills), it is considered that both options should be progressed.

## Topic 8: Improving Air Quality

<b>Issue 1 - In which developments should Air Quality Assessments (AQAs) be required?</b>
<p>Reasonable alternatives:</p> <ol style="list-style-type: none"> <li>1. Developments that, post-construction, result in a reduction in air quality in the area</li> <li>2. Developments that reduce air quality during construction</li> <li>3. Developments occupied by people who are more sensitive to air pollution</li> <li>4. Developments that take place in areas with poor air quality</li> </ol>
<p>SA conclusions:</p> <p>All of the options result in more AQAs and thus could help to reduce the impacts that developments have on air quality by requiring significant mitigation measures. There are several cumulative, direct and indirect impacts that are likely to benefit the borough as a result of implementing these options, for example increasing green infrastructure, reducing waste production and greenhouse gas emissions and long term financial savings, improved health and wellbeing, improved productivity and benefits to the local economy. All four options are likely to have a significant positive impact on the air quality SA objective. To best ensure high air quality in all areas of the borough, air pollution should be minimised from all developments. All options individually help to reduce any harmful impacts that developments may have on air quality, but applied together, all options cumulatively are likely to have a much more positive effect on improving air quality. Negative impacts on air quality are likely to result if only 1 option is progressed. For example, if option 1 is progressed, negative impact on air quality are more likely to result from construction, and developments occupied by those more sensitive to air pollution (for example nurseries, hospitals, schools, older persons housing) will unlikely be scrutinised for air quality impacts. Accordingly, it is recommended that all four options are progressed.</p>
<b>Issue 2 - What types of mitigation should be required?</b>
<p>Reasonable alternatives:</p> <ol style="list-style-type: none"> <li>1. Mitigate impacts of construction</li> <li>2. Mitigate impacts of the development on the area</li> <li>3. Mitigate impacts of the existing poor air quality in the area on those who will occupy the development</li> </ol>
<p>SA conclusions:</p> <p>Generally the council should attempt to ensure that all potential harmful impacts of new developments are mitigated as fully as possible. Mitigation can lead to both short and long term benefits for existing local communities and future occupiers of the development. To improve air quality in all areas of the borough, levels of air pollution should be minimised from all developments. All of the options are likely to have a positive impact on air quality. Option 1 can better ensure that deliveries of construction material to and from sites are undertaken when local traffic levels are low, reducing the risk of congestion for example. In turn it could help prevent particulates created during construction from affecting surrounding areas by requiring green walls around the site. Option 1 is likely to reduce negative impacts of development in the short term, by reducing the impacts of dust and other particulates on surrounding communities and the local environment. All three options could result in the creation of new vegetation which can then help to improve local air quality. However if option 3 only protects new occupants from existing poor air quality it is less likely to have a positive impact on the wider community. Option 2 could potentially have similar positive impacts over a longer time period. Depending on the type of mitigation measures required, option 3 could directly benefit future occupants of the development rather than existing local communities. All three options have the potential to result in the creation of new green infrastructure. This can help to protect local air quality and</p>

provide space that increase the liveability of the local area. All three options applied together would have positive cumulative effects on improving air quality in the borough.

It is recommended that all options are progressed into policy. In order to effectively improve air quality construction impacts need to be mitigated and managed, and the impact of the development on the area needs to be mitigated and managed. In order to more effectively protect occupant's health and wellbeing, the impact of existing poor air quality on occupants of new development needs to be mitigated and managed.



## Topic 9: Waste

### Issues 1 - Replacement Waste Site Locations

Reasonable alternatives:

1. Identify specific sites in Lambeth for additional waste management
2. Identify broader areas for waste rather than allocating specific sites.
3. Allow replacement waste sites to be outside Lambeth, so long as Lambeth would not be penalised against its target.

SA conclusions:

Option 1 identifies specific sites and thus the potential of these sites to deliver alternative land uses, such as other types of business use, could be harmed, with a possible risk of 'land blight'. Consequently business growth in the areas could be adversely impacted on. Such sites may be vacant and/or derelict until required for replacement waste use. This would not be conducive to creating liveable environments that make people feel proud of their local area.

Options 1 and 2 seek to keep replacement waste sites in Lambeth and so, in principle, the borough should experience no net loss of jobs and would experience the economic benefits of new businesses in the green industry sector. In turn, both of these options can enable the council to better manage where new waste sites are to be located and so ensure relationships with existing land uses are managed effectively for the benefit of both businesses and residents.

Options 2 and 3 could ensure that waste operators have greater locational flexibility by allowing them a broader range of potential waste sites within which they can choose to operate. Thus options 2 and 3 could improve efficiency of routes and reduce the need to travel, decreasing travel costs, lower land/site costs and improving environmental performance of waste operation businesses with associated improvements in air quality.

Option 3 allows replacement waste sites to move outside of the borough and so could better enable waste operators greater flexibility with regard to locations for potential new waste sites. This could make it easier for waste operators to undertake their work and reduce the need for their waste trucks to travel long distances. It could also have benefits at a London-wide level by helping to achieve the best strategic solution to managing London's waste.

## Topic 10: Transport

<b>Issue 1 - Modes of Transport</b>
<p>Reasonable alternatives:</p> <ol style="list-style-type: none"> <li>1. Encourage more people to walk, cycle and use public transport rather than travel by car</li> <li>2. If encouraging people to use alternatives to cars, focus mostly on public transport</li> <li>3. If encouraging people to use alternatives to cars, focus mostly on walking and cycling (e.g. make walking and cycling as safe as possible so that no-one is put off because streets are inaccessible or feel unsafe to them)</li> <li>4. Not encourage people to use alternatives to cars</li> </ol>
<p>SA conclusions:</p> <p>The assessment demonstrates that Lambeth’s priority should be to continue discouraging people from using cars. Options 1, 2 and 3 are likely to positively impact on this objective by encouraging alternative forms of travel. Options 1 and 3 are likely to contribute to the achievement of health and wellbeing objectives by encouraging physical exercise and, in turn, reducing harmful vehicle emissions and pollutants which in turn results in improved respiratory health and improved air quality. Option 2 could similarly have a positive impact on health albeit to a lesser extent; buses for example still emit harmful gases (although it is recognised that the number of hybrid electric and fully electric buses are increasing). By not encouraging alternatives to cars, option 4 is likely to harm the health and well-being of Lambeth’s population as greenhouse gas emissions from cars could potentially increase, and active travel modes aren’t encouraged.</p> <p>In terms of social equity, people require different transport options based on costs, journey times, preferred travel options and health issues. Consequently option 1 is most likely to provide the largest variety of alternative options for the wider population and therefore have the greatest positive impact on equality objectives. Public transport improvements also have the potential to promote equity and fairness across the borough by enabling all communities to access services, facilities and employment opportunities. Lambeth should however ensure that provision is met for population groups who require car use, such as the disabled. Options 1, 2 and 3 could help to reduce traffic and so improve travel conditions for these populations.</p> <p>Accordingly it is considered that options 1, 2, and 3 much more likely to better cater to a wider range of transport needs and preferences whilst providing positive effects on the environment, health and the economy. Option 4 does not encourage alternatives and so is unlikely to have a positive impact on a range of Lambeth’s sustainability objectives.</p>
<b>Issue 2 - Managing Roadspace</b>
<p>Reasonable alternatives:</p> <ol style="list-style-type: none"> <li>1. Give more priority to buses across the borough</li> <li>2. Develop measures to reduce overall traffic levels and protect local streets from ‘rat running’ traffic</li> <li>3. Use parking controls to manage demand for parking, prioritising the needs of residents and protecting essential access.</li> <li>4. Prioritise alternative uses of the kerbside such as car club bays, cycle parking and electric vehicle (EV) charging points, in response to user demand</li> <li>5. No change to current position</li> </ol>
<p>SA conclusions:</p> <p>Each of the options potentially has positive sustainability benefits associated with them. Option 1 prioritises buses – this will improve a form of mass transit and so is likely to improve overall transport sustainability across the borough and could potentially reduce overall traffic levels and greenhouse gas emissions, particularly at peak times and/or through use of bus</p>

only lanes. Option 2 could also reduce emissions whereas option 3 could enable those who require a car to better access their vehicle. When compared to private car use, option 4 can help to facilitate the growth of more sustainable transport alternatives such as cycling. All of the options can be used to help inform new policies.

**Issue 3 – Car Free Developments**

Reasonable alternatives:

1. All new development should be car free except for disabled parking
2. New development should be car free except for disabled parking in parts of the borough that are most polluted/congested
3. New development should be car free except for disabled parking in parts of the borough that have the highest access to public transport
4. Development should be car free particularly in areas where alternative modes of transport are available and where public transport accessibility is high - No change to current position

SA conclusions:

Physically, in comparison to active transport modes, cars are not a healthy way of travelling. Consequently all of the options, especially option 1 are likely to result in a reduction in car use and promote a healthier borough by ensuring developments are car free, except for disabled parking and thereby helping to reduce causes of ill health. Option 1 is more likely to get more Lambeth residents and workers walking and cycling and therefore improving their health and being, with associated benefits to the environment and economy. All of the options have potential to reduce the harm posed by private car use (i.e. air pollution, road traffic, noise pollution) by reducing levels of parking in new development in Lambeth and thus perhaps encouraging other, cleaner modes of transport. In this way, option 1 is likely to benefit the borough the most by requiring all new developments to be car free except for disabled parking. However, just because parking is not provided as part of new development does not mean that occupiers will not want or require a car. And such cars will inevitably be parked on local streets. This could lead to congested streets (many streets essentially become 'one way' when vehicles are parked on either side of the street), which is not conducive to efficient use of land. Other forms of mitigation for this issue may therefore need to be considered.

It is acknowledged that all of the options are likely to adversely affect some population groups who require the use of a car (except for disabled people) and thus potentially harm their accessibility to key services, facilities or perhaps even jobs. Options 2 and 3 offer some mitigation against this by only requiring car free developments in certain areas of the borough.

## APPENDIX 1 – FULL SUSTAINABILITY APPRAISALS OF ISSUES AND REASONABLE ALTERNATIVES

### Topic 1: Housing in Lambeth

#### 1.1 Managing Housing Growth

London’s population is expected to reach 10.3 million people by 2035, an increase of about 1.5 million from 2017, which means every London borough, including Lambeth, must plan for more housing to meet this growing need. Lambeth will need to strike the right balance in using land for housing with that needed for jobs and business, schools, health and waste facilities, green spaces and leisure activities.

KIBAs are Lambeth’s ‘Locally Significant Industrial Sites’ as defined in the London Plan and represent the borough’s strategic reservoirs of land for business use. There are currently 28 KIBAs in the borough. Lambeth has reviewed all 28 KIBAs and found that most of them cater to specific business needs. However, some have experienced permitted changes to housing and some sites may have potential for development involving a mix of small business space and housing. Lambeth is considering whether or not to amend the boundary of some of their KIBAs.

The following table assesses three alternative options for managing housing growth in Lambeth. Option 1 proposes to release a limited amount of industrial land to allow for mixed use development that allows for new housing and workspace. The industrial land in question is likely to be land designated as Key Industrial Business Area (KIBA). There are 28 KIBAs within the borough and 6 of these could be reduced in size to allow for alternative uses. Option 2 encourages higher density developments in town centre and in locations with good access to public transport, whereas option 3 proposes no change to policies in the current Lambeth Local Plan 2015.

<b>Issue 1.1 – Managing Housing Growth</b>	
Reasonable Alternatives:	
<ol style="list-style-type: none"> <li>1. Release a limited amount of industrial land to allow for mixed use development that allows for new housing and workspace</li> <li>2. Encourage higher density developments in town centres and in locations with good access to public transport</li> <li>3. No change to current policy position</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Option 2 could potentially result in community safety benefits as more people living in town centres could lead to more activity on the street and increased amounts of passive surveillance. Option 1 could also benefit natural surveillance levels, as the introduction of housing could help to improve safety in the immediate vicinity by increasing ‘eyes on the street’ surveillance and increasing night-time activity in the local area. In turn day-time surveillance levels associated with current industrial uses could be preserved by new workspaces provided in their place.

	<p>Option 3 may result in negative effects on crime and safety if people feel forced to live with many people to a single dwelling or are homeless because the borough does not have enough housing to support population growth. Negative effects on crime may also result if underused or underperforming KIBAs are retained rather than released for more active landuse (such as housing).</p>
<p>2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.</p>	<p>Option 1 could have a potential negative impact on this SA objective if new housing were to be located in very close proximity to particular types of heavy industrial / 'bad neighbour' uses. Potential harmful impacts on the health and wellbeing of residential occupiers attributed to, for example, air pollution, noise and the use of shared access ways, would need to be mitigated. Generally, locations for new housing needs to be carefully considered in relation to the existing levels of air quality and other impacts on amenity that in turn can affect health and wellbeing (for example, noise, vibration, odours, heavy vehicle movements). It is noted that not all KIBAs involve 'bad neighbour' uses, or result in adverse effects on amenity.</p> <p>Active travel modes include walking and cycling. Car travel is non-active travel mode associated with negative health impacts. Option 2 has the potential to result in more people having access to health care and other related services and also encourage active and sustainable transport modes, being closer to centres and public transport links. It is therefore likely to have a positive effect on this SA objective. Higher density housing will need to be carefully designed to minimise/reduce any potential negative impacts on health and wellbeing and residential amenity (for example, privacy, access to outdoor space, private outdoor space, access to green space, noise, access to sunlight and daylight).</p>
<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>Option 2 could result in more people living in locations with good access to key services and facilities (i.e. town centres) and would therefore impact positively on this SA objective. Option 2 could also enable more people to take advantage of existing public transport infrastructure and thus more sustainably access wider areas. However, such infrastructure, services and facilities will need to keep pace with population growth to ensure access to quality services that help facilitate more sustainable ways of living.</p> <p>Mixed use developments could have the potential to include new local services as part of the wider development scheme and therefore have a positive impact on this SA objective. The council would need to require adequate provision of key services and facilities in mixed-use schemes.</p>
<p>4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands</p>	<p>More residential development is likely to increase Lambeth's population and could put more pressure on existing infrastructure across the borough. However it is not possible to differentiate between the potential effects of the options on this objective.</p>

<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Options 1 and 2 are both likely to result in the delivery of new housing, including affordable homes, and therefore better enable lower income groups to access housing. In this regard both options are likely to have a positive impact on this SA objective.</p> <p>Option 2 would deliver more homes in sustainable locations, close to public transport links, services and facilities, and employment opportunities. In this regard option 2 may have a greater positive impact in promoting social integration and access to employment opportunities, services and facilities than option 1.</p> <p>Housing would continue to be delivered under option 3 but the level of housing capacity in Lambeth would be lower as a result, so Lambeth's ability to contribute meeting housing need in London would be less. Housing need can disproportionately affect vulnerable groups and people more liable to discrimination, poverty and social exclusion. Lack of supply would likely increase house prices and rents further, making finding a home even more unattainable for some population groups and/or general public.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>Options 1 and 2 could help to increase Lambeth's overall housing supply and affordable housing supply. This could help cater to the needs of the current population and help to meet household projection numbers.</p> <p>However, considering the locations proposed in both options, the amenity of new development could potentially be negatively impacted upon through option 1 by industry effects (such as noise, vibration, dust). These potential impacts would need to be mitigated during the design process. Not all KIBAs result in adverse amenity for surrounding neighbours.</p> <p>Overall, in comparison to option 3, higher numbers of homes could potentially be delivered through options 1 and 2.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>Option 1 has the potential to result in mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place. However there is also a risk that option 1 could potentially result in housing in inappropriate locations (e.g. next to 'bad neighbour' uses). This could harm the liveability of the new development.</p> <p>Option 2 could facilitate the delivery of new housing in close proximity to good public transport links and key services and so it has the potential to promote sustainable lifestyles. Transport infrastructure and key services/facilities will need to keep pace with population growth to ensure quality service provision and sustainable living.</p>
<p><b>Environmental</b></p>	
<p>8 - Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality</p>	<p>All new development has the potential to impact upon the landscape of Lambeth however the existing Lambeth Local Plan already has policies to manage impacts on, and improve the quality and character of the built and historic environment.</p> <p>By developing former industrial land, option 1 has the potential to benefit this SA objective by improving the quality, attractiveness, character and sustainability of the built environment, particularly at a</p>

<p>design and protection of open space, valued views and historic assets.</p>	<p>localised neighbourhood level. In the same way option 2 has the potential to improve the built environment in town centres, however it is not envisaged that there will be significant differences between the alternative options on this SA objective.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport</p>	<p>Option 2 could help to deliver homes, within town centres, that are closer to employment areas, retail destinations and key services and facilities. Therefore this could help to reduce the need to travel. Moreover, if travel was necessary, this option could enable more people to take better advantage of the existing public transport network and so reduce the need to travel by car. In turn, higher density developments could help to provide the critical mass necessary to justify additional sustainable travel infrastructure provisions (such as more walking and cycling facilities) but also improvements to rail and tube capacities/access.</p> <p>Key Industrial Business Areas tend to be located in more remote areas of the borough and so it could be less likely that occupants of developments adjoining these areas could undertake active-travel modes, such as walking, from these locations. Instead they might travel by car. However by integrating planning and transport decisions and ensuring that these developments comprise a good mixed of uses, active travel modes could potentially take place. Ideally KIBAs released for housing should be in areas with good public transport accessibility.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>Options 1 and 2 have the potential to create new opportunities for biodiversity to flourish. For example gardens/green roofs and walls could be created and other forms of green infrastructure could be generated in new mixed use developments on former industrial land. Higher density developments in town centres could also be designed to promote/ improve biodiversity in these areas via green roofs for example. Accordingly, both options could have a positive impact on this objective. The Lambeth Local Plan has policies to protect, create and enhance biodiversity and these should be retained in the review.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>All new development will impact upon the landscape of Lambeth however the existing Lambeth Local Plan already has policies to protect and maintain open spaces and their function. However options 1 and 2 could increase the number of people in Lambeth and so increase demand on existing green infrastructure. Even so, new development has the potential to introduce new green infrastructure and improve and enhance existing green infrastructure and provide green linkages and so options 1 and 2 could benefit Lambeth in this way. The Lambeth Local Plan has policies to protect, create and enhance biodiversity, and ensure development is designed so as to contribute to green chains and links ('green corridors').</p>
<p>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</p>	<p>Higher density developments can aid the delivery of sustainable energy schemes such as combined heat and power and/or district heating. These types of developments are likely to result directly from option 2 but could also be created in option 1, where appropriate.</p> <p>Option 2 could reduce the amount of people who travel by car and this could help to reduce greenhouse gas emissions.</p>

unavoidable effects of climate change.	
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.	Accommodating increased housing growth in the borough will likely result in increased water consumption. The Local Plan has policy to minimise water consumption through incorporating water efficiency measures. Implementation of this policy will help mitigate adverse effects of options 1, 2 and 3 on this SA Objective.
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.	Option 1 could potentially result in less land available for waste management as KIBAs are considered to be appropriate locations for waste facilities. Both options 1 and 2 could lead to more waste generation during development demolition, construction and occupation. Option 3 also has the potential to increase the production of waste generated through new development but it also has the potential for positive effects on SA objective 14 by retaining land in KIBAs for waste management use.
15 - Air quality. To improve air quality	Option 2 has the potential to encourage people to use alternative transport modes to cars. Therefore harmful impacts on air quality, associated with car travel, could be reduced. Option 1 could also benefit air quality in this way however sustainable transport provisions would more likely need to be 'designed in' to such development schemes (assuming they are located further from existing transport nodes). Higher density development could help to provide the critical mass necessary to help implement sustainable energy solutions such as combined heat and power and/or district heating. These can also help to reduce levels of air pollution and benefit this objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	The Lambeth Local Plan has policies that require major new development to contribute towards employment and training for local people. Therefore all new major developments have the potential to benefit this objective.
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	Option 1 could result in less KIBA designated land (i.e. land protected for business and industrial uses) and so, initially, this could have a negative impact on the economy. However by creating mixed use developments, new purpose built business spaces could benefit Lambeth's overall stock and provide more workspaces for other businesses. These spaces could better meet the needs of the market.  Option 2 is likely to provide local businesses with more customers and create a larger pool of potential employees. Consequently the vitality of town centres could improve. Likewise, option 1 could provide a supply of customers and employees adjacent to existing KIBAs. Mixed use



	<p>developments on former industrial land could help to reduce commuter distances and costs for workers.</p> <p>Both options are likely to result in more development which, in turn, could increase inward investment and further encourage new business to locate in the borough. This could help boost and diversify the local economy.</p> <p>Option 3 would not result in any further benefits to the local economy than those outlined in the current Local Plan. Option 3 effectively seeks to retain KIBAs for business use, which may result in positive effects on the local economy unless such KIBAs are underperforming/underutilised. To minimise effects on the economy, KIBAs proposed for housing under Option 1 should be underperforming/underutilised.</p>
<p>18 - Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.</p>	<p>Higher density schemes will maximise overall land efficiency and so option 1 could help to ensure former industrial land is better used for a mixture of different uses.</p> <p>It is considered that options 1 and 2 are more likely to result in positive effects on SA objective 18 than option 3, particularly if the KIBAs released for mixed-use development are underperforming.</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>All options provide positive effects for SA objective 19.</p>
<p><b>Conclusions</b></p> <p>By releasing a limited amount of industrial land to allow for mixed use development, option 1 could make better, more efficient use of land and facilitate the delivery of a wider range of workspaces. High density developments in town centres and in locations with good public transport links (option 2) could help to improve access to key services, facilities and jobs, thereby potentially reducing the need to travel. Option 2 could also increase proximity to public transport modes and so encourage a reduction in car use in Lambeth (with associated air quality benefits). In comparison to option 3, both options 1 and 2 have the potential to deliver more homes and more affordable homes, and in a more sustainable way particularly if KIBAs are underperforming and have been for some time.</p>	

**Uncertainties/ Assumptions**

There are uncertainties around whether high density developments have negative impacts on health and wellbeing. Literature on the impact of housing density on health outcomes is inconclusive.

There are uncertainties surrounding the state of the industrial land that could be available for release through option 1, for example, it could potentially be contaminated owing to previous industrial use. Subsequently option 1 could pose contamination problems for future development of sites. Mitigation measures will be necessary.

This assessment assumes that high density schemes will be of high quality design. It also assumes that option 1 will provide enough workspaces to at least provide for the number of jobs lost from the former industrial use.

**Recommendations/ Mitigation**

Sustainable transport schemes will need to be incorporated into new mixed use schemes that come forward on former industrial land. KIBAs released for housing should ideally be located in areas with good public transport accessibility. The council should seek to minimise negative impacts arising from housing in close proximity to industrial uses. Generally, locations for new housing needs to be carefully considered in relation to the existing levels of pollution and air quality. Some KIBAs will be more suited to housing than others in terms of providing residential amenity and it is those KIBAs that should be considered for release, assuming evidence suggests KIBA designation is no longer needed to protect employment land in that location.

## 1.2. Quantity vs Quality of housing

The current Local Plan requires minimum amounts of external amenity space for all residential units. By relaxing the requirement for private gardens and balconies in new blocks of flats this could enable more housing to be provided. Moreover, some developers want to build blocks with very small flats or rooms with shared living spaces, much smaller than the current minimum standards for the size of new housing. They argue that this is a way to increase the number of new, more affordable homes for younger people.

The following table assesses three alternative options with regards to levels of amenity space, and minimum floorspace provided in new flatted developments in Lambeth. Option 1 relaxes the requirement for private gardens and balconies in new blocks of flats however it does not waive the requirement for amenity space. Option 2 supports the development of blocks with very small flats/rooms with shared living spaces whereas option 3 requires minimum levels of external space for all new residential units in Lambeth.

### Assessment of Alternatives

<b>Issue 1.2 – Quantity vs Quality of housing</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Relax the requirement for private gardens and balconies in new blocks of flats to enable more housing to be provided</li> <li>2. Support the development of blocks with very small flats/rooms with shared living spaces, much smaller than the current minimum standards for the size of new housing, to increase the number of new, more affordable homes for younger people</li> <li>3. The Council will require minimum external amenity space for all residential units (no change to current position)</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Access to adequate private outdoor space can play an important role in the physical and mental health and wellbeing of people. Access to daylight, fresh air, space to dry washing, socialise, play in, enjoy wildlife and grow plants/vegetables etc. can add significantly to the quality of life of residents of all ages. It is considered that Option 1 is likely to result in a reduction in the provision of private amenity space which could negatively impact on health and wellbeing objectives. If there is a reduction in private space for flats, then there needs to be sufficient communal outdoor spaces for residents. Option 3, which would maintain

	<p>existing amenity space standards, is considered likely to have a positive impact on this SA objective.</p> <p>Creating very small flats could potentially increase residents' propensity to suffer from stress and claustrophobia caused by overcrowding unless designed very well to avoid this. However, it may be argued that for some population groups/personality types, the creation of development blocks with shared living spaces might offer positive impacts on health through more social interaction. Such development blocks may provide mental health benefits for first time buyers and the benefits that come with being on the property ladder. Effects from option 2 are therefore considered uncertain; for some types of people the effect may be positive, while for others the effect may be negative on health and wellbeing.</p>
<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>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands</p>	<p>More development is likely to increase the overall population and so options 1 and 2 are more likely to increase demand on existing green infrastructure. This could require the council to re-assess infrastructure provision across the borough.</p>
<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Option 2 could help to reduce social exclusion by developing shared living spaces. However, it is considered this type of living arrangement would not necessarily appeal to all population groups/personality types. If a greater number of homes are delivered that are more affordable for younger people, there could be more opportunities for them to live in their own home and reduce inequalities in the housing market. Similarly more affordable homes, albeit very small flats or rooms with shared living spaces, could help lower income population groups to afford their own home. Option 1 could potentially result in no private amenity space for some units. Development proposals would need to demonstrate access to sufficient communal outdoor space to mitigate adverse effects on health and wellbeing and provide more equitable outcomes for all communities (it is considered more likely that units delivered under option 2 would be cheaper and</p>

	therefore more likely enticing by more vulnerable/lower income groups). Option 3 ensures minimum levels of amenity space and so helps to deliver more equitable outcomes for all communities. Overall, it is considered more likely that more long-term positive effects on SA objective 5 would result from option 3 than options 1 or 2.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Options 1 and 2 could benefit this objective by delivering more housing overall and so aid affordable housing delivery. However, care would need to be taken to ensure that the housing being delivered is of an acceptable quality and that local amenity of the wider area is not adversely affected.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	By supporting flats with shared living spaces, option 2 has the potential to aid social cohesion in the short term. However, longer term effects of shared living space are unknown. Option 3 could be a more environmentally sustainable solution as it ensures amenity space is developed for residents and in turn these spaces could aid resident's ability to lead sustainable lifestyles and possibly improve sense of place. Option 1 reduces the probability of residents growing their own food or herbs and may also reduce the likelihood of residents feeling that 'sense of place' and belonging to their home and the wider site/development, perhaps more so on a longer term time scale.
<b>Environmental</b>	
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.	By relaxing the requirement for private gardens and balconies option 1 may not improve the attractiveness, character and sustainability of the built environment. Option 3 could help to improve the sustainability of the built environment by better ensuring open space provision through new development that is also more likely to be used more frequently.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Option 3 could enable more garden space, for example, to be created as part of developments therefore biodiversity could have a better chance to thrive and help bring people nature closer to people. In contrast option 1 potentially may not benefit biodiversity to the same extent if lower

	<p>amounts of private gardens are required. However, even if private garden and balcony provision is relaxed; sufficient areas of communal open space should still be provided. There may be better opportunity to create more biodiverse areas in a communal outdoor setting than what may be delivered in small private gardens/balcony/terrace. The effect of options 1 and 3 on the biodiversity objective depend very much on implementation.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>Option 3 is more likely to directly enhance levels of green infrastructure in Lambeth by requiring minimum amounts of external amenity space than compared to option 1. In contrast option 1 may not benefit levels of green infrastructure across the borough in same way as the requirement for private gardens and balconies is relaxed. However, even if private garden and balcony provision is relaxed; sufficient areas of communal open space should still be provided. There may be better opportunity to create more green areas in a communal outdoor setting than what may be delivered in small private gardens/balcony/terrace. The effect of options 1 and 3 on the green infrastructure objective depend very much on implementation. Option 2 may result in a higher densities of people using open space (thereby reducing the amount of open space available per head of population).</p>
<p>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>	<p>In comparison to option 1, option 3 could better enable the delivery of green infrastructure by requiring garden spaces as part of new developments. Such spaces can help to reduce levels of greenhouse gases.</p>
<p>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>	<p>Gardens have the potential to help reduce surface water levels by increasing the amount of water permeable surfaces. When compared to option 1, it is more likely that option 3 will deliver more gardens and so help minimise flood risk in the borough.</p>
<p>14 - Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>15 - Air quality. To improve air quality</p>	<p>Option 3 can help to improve air quality by increasing overall amounts of green spaces required through new development.</p>
<p><b>Economic</b></p>	

16 - Education and skills. To maximise the education and skills levels of the population.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	Options 1 and 2 could help to deliver more homes in Lambeth and so increase local workforce numbers and expand the local customer base. This could help local businesses to grow and drive dynamic local economies.
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.	It could be argued that options 1 and 2 will maximise the efficient use of land by delivering more homes overall. Option 3 could improve the attractiveness of an area by allowing new developments with minimum amounts of amenity space. This could also stimulate inward investment and maximise benefits to deprived areas.
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.	Options 1 and 2 are likely to deliver more homes in Lambeth and therefore improve access to employment opportunities within the borough and wider capital (for people who are currently too far away).

**Conclusions**

Both option 1 and 2 could increase the overall number of homes in Lambeth however this uplift could come at the cost of amenity space (option 1) or internal space (option 2). Option 2 will however result in the delivery of homes that are likely to be more affordable and these can help to reduce housing inequalities.

Option 3 will provide minimum amounts of internal space and amenity space for future residents. This is likely to reduce the likelihood of residents experiencing any negative impacts on mental well-being and result in more gardens across the borough overall - these spaces can aid residents' health, increase schemes' green infrastructure provision, enhance biodiversity and improve the attractiveness of the built environment.

**Uncertainties/ Assumptions**

There are long term uncertainties around whether option 2 will provide housing that people truly want to live in. If such blocks prove to be unpopular, reconfiguration of these units may be necessary in the future and will likely generate unsustainable effects. This assessment assumes that amenity space provided via option 3 is high quality amenity space that is likely to be well used by occupiers.

The effect of options 1 and 3 on biodiversity and green infrastructure objectives depend very much on implementation.

**Recommendations/ Mitigation**

Option 3 should include wording to ensure that the quality of the amenity space provided is as high as possible and easily accessible to all potential residents.

Should option 2 be progressed, it is recommended sufficient outdoor communal open space is provided. The amount of open space provided will need to be commensurate to the number of units delivered/number of occupiers expected.

### 1.3 Student Housing in Vauxhall

Vauxhall is already home to student accommodation and there are two further student housing scheme currently under-construction in the area. Consequently Lambeth is considering whether Vauxhall needs any more specialist student housing. Perhaps the priority in Vauxhall should be to deliver more general needs housing, alongside businesses and jobs.

The following table assesses two alternative options for managing student housing in Vauxhall. Whereas option 2 continues to allow student housing schemes subject to other policies, option 1 restricts further student housing in the area. It should be noted however that option 1 does not state that it will not support *any* new student housing.

#### Assessment of Alternatives

<b>Issue 1.3 – Student Housing in Vauxhall</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Restrict further student housing in Vauxhall to allow more general needs housing alongside businesses and jobs</li> <li>2. Allow student housing schemes, that accord with applicable policies set out in the development plan, in areas with good public transport access, and easy access to local shops, work places, services and community facilities (no change to current position)</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Vauxhall is a growing district centre. Option 2 allows more student housing in Vauxhall and thus it will help to create an environment that is accessible to and fully inclusive for students. Option 1 is likely to result in more alternative land uses, such as residential or commercial, schemes coming forward in Vauxhall. Such residential schemes could improve accessibility to key services and facilities for a wider range of people, including disabled people.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	More development is likely to increase Vauxhall's population and could put more pressure on existing infrastructure. However it is not possible



	to differentiate between the potential effects of the options on this objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Option 1 is likely to deliver more conventional housing and affordable housing, and more jobs in Vauxhall. This could benefit a wide range of people and so better enable lower socio-economic groups for example to access a home and/or job. Option 1 could potentially adversely affect student groups, as it is likely to result in fewer student units being provided in Vauxhall.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Option 1 has the potential to result in the delivery of a greater number of conventional residential developments in Vauxhall to meet current and future demands, which would positively impact on the achievement of this SA objective. Further, general needs affordable housing is not currently sought alongside student housing developments, therefore option 1 is likely to have a positive impact through the delivery of more affordable homes. However, it is also likely to result in fewer student units being provided.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	By restricting further student housing, option 1 could help to provide a better mix of homes, businesses and jobs in Vauxhall. Such a mix of uses can help to promote social cohesion, sustainable lifestyles and a sense of place.
<b>Environmental</b>	
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.	All new development has the potential to impact upon the landscape of Lambeth however the existing Lambeth Local Plan already has policies to manage impacts on, and improve the quality and character of the built and historic environment. Consequently, it is not possible to differentiate between the relative merits of the alternative options against this objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	It is not possible to differentiate between the relative merits of the alternative options against this objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	It is not possible to differentiate between the relative merits of the alternative options against this objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	It is not possible to differentiate between the relative merits of the alternative options against this objective.

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.	It is not possible to differentiate between the relative merits of the alternative options against this objective.
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.	It is not possible to differentiate between the relative merits of the alternative options against this objective.
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.	It is not possible to differentiate between the relative merits of the alternative options against this objective.
15 - Air quality. To improve air quality	It is not possible to differentiate between the relative merits of the alternative options against this objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Option 2 could enable more students to live in Lambeth and possibly study in the borough. This will help to maximise the education and skills levels of the population. Option 1 is not likely to benefit Lambeth in the same way as it restricts further student housing development in Vauxhall.
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	Option 1 could enhance the local economy by enabling more business to set up/ existing business to expand in Vauxhall through the development of new office and workspaces, enabling business growth. Option 2 could enhance the local economy by increasing the skill levels of Vauxhall's workforce. This could then help to attract new businesses to the area. Option 2, like option 1, could also increase the number of residents in Vauxhall and thus increase the local customer base and employment pool.
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.	Both options have the potential to positively impact on this SA objective. Option 1 could enable more homes and businesses to come forward. It is considered that option 1 could potentially stimulate regeneration that maximises benefits to the most deprived areas and communities, through the delivery of more homes and jobs in Vauxhall.
19 - Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for	More jobs are likely to be delivered from schemes that allow new business to set up, i.e. option 1. In the long term, fewer jobs are likely to be created through student housing scheme when compared to new commercial schemes for example. Option 2

<p>rewarding, well located and satisfying employment.</p>	<p>allows student housing in areas with good transport accessibility and so will limit sites with good public transport access that can be used for employment purposes.</p>
<p><b>Conclusions</b>                  Option 1 could help to deliver more homes and jobs in Vauxhall, an area with good public transport. Therefore this option can increase the amount of and access to employment generating activities. On the contrary option 2 allows student accommodation in the district centre which could increase its skilled work base, enhance its customer base and possibly help attract new businesses to Vauxhall. However it may limit the scope to develop other uses i.e. housing, business and jobs in Vauxhall and so may not benefit the wider population to the same extent as option 1.</p> <p><b>Uncertainties/ Assumptions</b>                  Assume that restricting student housing in Vauxhall will not prohibit all student housing schemes in the area over the life of the plan. Therefore some student housing scheme could still come forward to help meet Lambeth’s student accommodation demand.</p> <p><b>Recommendations/ Mitigation</b></p>	

### 1.4 Build to Rent Locations

Purpose-built private rented homes, held in the longer term for private renting, are variously referred to as Build to Rent. In the new Lambeth Local Plan, the council could support the principle of Build to Rent development borough-wide or it could develop policy to direct Build to Rent schemes to particular locations or types of site. These might include town centres, Opportunity Areas and/or areas with higher public transport accessibility, on the basis that Build to rent accommodation is high density and would be most appropriate in these locations.

The following table assesses two alternative locations for where to support build to rent schemes.

#### Assessment of Alternatives

<b>Issue 1.4 – Quantity vs Quality of housing</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Support the principle of Build to Rent borough-wide?</li> <li>2. Support Build to Rent schemes only in particular locations or types of sites?</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Both options could potentially result in community safety benefits as they are likely to result in more people living in the borough. More people living in Lambeth could lead to more activity on the street and increased amounts of passive surveillance.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	<p>Research shows there are links between housing quality, better welfare and reduced costs to society (Ambrose 2002). Access to housing and residential stability can contribute to improved mental, emotional and physical health and wellbeing. Consequently both options could have a positive impact on this objective, provided option 2 is in appropriate locations like opportunity areas and town centres.</p> <p>Car travel is non-active travel mode associated with negative health impacts. Option 2 could direct Build to Rent schemes to certain locations such as in town centres, Opportunity Areas and/or areas with higher public transport accessibility. Consequently this could lead to more people undertaking active travel modes such as walking and cycling and sustainable options like public transport. In turn, option 2 has the potential to result in more people having access to health care and other related services, being closer to centres and public transport links, and therefore is likely to have a positive effect on this SA objective.</p> <p>Although it is recognised that gp surgeries and other day to day services are available borough-wide and in local centres.</p>

	<p>High density build to rent schemes in town centres may be less likely to have private outdoor space or direct access to large communal outdoor space, and for some people this could adversely affect health and wellbeing. Allowing build to rent schemes borough-wide offers more choice of location to potential tenants, who can decide which services and amenity characteristics suit them best.</p>
<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>Option 2 could result in more people living in locations with good access to key services and facilities (i.e. town centres) and would therefore impact positively on this SA objective. Option 2 could also enable more people to take advantage of existing public transport infrastructure and thus more sustainably access wider areas.</p> <p>In the same way, option 1 could potentially have a positive impact on this objective; services like schools, nurseries, gp surgeries, places of worship, community centres, local centres with food shops, childrens play areas and open space are located borough-wide albeit some neighbourhoods are better provided for than others. Public transport accessibility levels vary across the borough though. Major town centres, and opportunity areas are more likely to have better public transport accessibility.</p>
<p>4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands</p>	<p>More residential development is likely to increase Lambeth's population and put more pressure on existing infrastructure across the borough. However it is difficult to differentiate between the potential effects of the options on this objective as it is not known where these schemes will be delivered. Thus the overall effect of these policy options on this SA objective is uncertain.</p>
<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Option 1 provides those wishing/needing to rent with more options on areas to live in the borough. Individuals would be able to decide for themselves their preferred type of residential amenity (e.g quiet suburban, access to large parks and open spaces, access to lively high streets, thriving night time activities). Option 2 limits the provision of build to rent schemes to town centres, opportunity areas, high public transport accessibility; and having access to these areas may not be a high priority for all population groups. Similarly, build to rent schemes in town centres, opportunity areas and close to high public transport accessibility areas may command higher rents than elsewhere</p>

	<p>in the borough. This may discriminate against lower income groups.</p> <p>Nonetheless options 1 and 2 are both likely to result in the delivery of new housing, including affordable homes albeit these may not be for the lowest income groups. In this regard both options are likely to have a positive impact on this SA objective. Although this may not be as positive as other forms of non-build to rent housing which can deliver more social/affordable rent accommodation.</p> <p>Option 2 could deliver more homes in sustainable locations, close to public transport links, services and facilities, and employment opportunities. In this regard option 2 may have a greater positive impact in promoting social integration and access to employment opportunities than option 1.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>Options 1 and 2 could help to increase Lambeth's overall housing supply, housing tenure mix and potentially affordable housing supply albeit this might be mainly intermediate affordable and therefore not meeting the most acute need. Subsequently both options have potential to positively impact on this objective. Although providing build to rent schemes only in specific areas of the borough limits tenant choice of locations to rent. Opportunity areas and town centres may not provide quiet residential amenity that other areas of the boroughs do. Similarly, opportunity areas and town centres may command higher rents than elsewhere in the borough, potentially reducing housing choice for some population groups.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place.</p>	<p>The principle of build to rent schemes in itself helps promotes long-term social cohesion and sense of place by providing increased certainty to tenants of their ability to rent long-term (as opposed to non-purpose-built rented housing). Schemes provided in locations close to public transport nodes and other services and facilities provided in town centres (e.g shops, healthcare, and employment) are more likely to promote sustainable lifestyles and create mixed use physical and social environments. Providing build to rent in only these locations does limit choice to tenants though, who may favour areas in the borough more quiet and suburban in nature.</p>
<p><b>Environmental</b></p>	

<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>All new development has the potential to impact upon the landscape of Lambeth however the existing Lambeth Local Plan already has policies to manage impacts on, and improve the quality and character of the built and historic environment.</p> <p>Option 1 has the potential to benefit this SA objective by improve the quality, attractiveness, character and sustainability of the built environment. In the same way option 2 has the potential to improve the built environment in town centres/ Opportunity Areas for example, however it is not envisaged that there will be significant differences between the alternative options on this objective.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.</p>	<p>Option 2 could help to deliver homes in areas with higher public transport accessibility or in town centres. Consequently they are likely to have improved access to employment, retail, services and facilities. Therefore this could help to reduce the need to travel and/or reduce private vehicle use. Moreover, if travel was necessary, option 2 could enable more people to take better advantage of the existing public transport network and so reduce the need to travel by car. Comparably, option 1 could result in Build to Rent schemes in more remote areas of the borough and so it may be less likely that occupants of these developments could undertake active-travel modes, such as walking, from these locations. Instead they might travel by car. However by integrating planning and transport decisions, active travel modes could potentially take place. It might be appropriate to promote build to rent schemes in locations with good or better public transport accessibility level ratings.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.</p>	<p>The alternative options are not envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>All new development will impact upon the landscape of Lambeth however the existing Lambeth Local Plan already has policies to protect and maintain open spaces and their function. However options 1 and 2 could increase the number of people in Lambeth and so increase demand on existing green infrastructure. Even so, new development has the potential to introduce new green infrastructure and so options 1 and 2 could potentially benefit Lambeth in this way.</p>
<p>12 - Climate change and energy. Minimise energy consumption and</p>	<p>Build to Rent schemes are usually high density developments. Consequently they can aid the</p>

increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	<p>delivery of sustainable energy schemes such as combined heat and power and/or district heating and so both options can positively impact on this objective.</p> <p>Option 2 could increase the proportion of Lambeth residents who travel by sustainable transport modes such as walking and using public transport. Thus this option could help to reduce greenhouse gas emissions.</p>
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.	It is not considered possible to differentiate between the relative merits of the alternative options against this objective.
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.	It is not considered possible to differentiate between the relative merits of the alternative options against this objective.
15 - Air quality. To improve air quality	<p>Option 2 could potentially encourage more people to use alternative transport modes to cars as this option supports Build to Rent schemes in particular locations – these could be town centres or in areas where there are higher levels of public transport accessibility. As such harmful impacts on air quality, associated with car travel, could be reduced.</p> <p>Option 1 may also benefit air quality in this way however sustainable transport provisions may need to be ‘designed in’ to these development schemes if they are located in more remote areas of the borough.</p>
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	It is not considered possible to differentiate between the relative merits of the alternative options against this objective.
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>Both options are likely to provide local businesses with more customers and create a larger pool of potential employees. Option 2 could direct these people to town centres for example and so may improve vitality of town centres.</p> <p>Both options are likely to result in more development which, in turn, could increase inward investment and further encourage new business to locate in the borough. This could help boost and diversify the local economy.</p>



	<p>Option 1 could provide lower rental homes than those located in town centres, allowing those that require lower rental housing more disposable income to spend on other things (than rent) and therefore, positively contribute to the local economy.</p>
<p>18 - Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.</p>	<p>Higher density schemes such as Built to Rent, are likely to maximise overall land efficiency and so both options could have a supportive impact on this objective. Build to rent also satisfies a housing need for those in need of long-term rental accommodation.</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>It is not known where in the borough these schemes will be delivered through option 1. Thus the effect of this policy option on this SA objective is uncertain. Option 2 could provide more homes and specifically more rental accommodation, in town centres and/or Opportunity Areas and so improve access to more employment opportunities.</p>
<p><b>Conclusions</b></p> <p>It is not known where in the borough Build to Rent schemes will be delivered through option 1 therefore it is difficult to assess the potential effects of this policy option on some of the SA objectives. By contrast, option 2 encourages Build to Rent (high density) schemes in particular locations for example, in town centres or in locations with good public transport links. As such option 2 could help to improve access to key services, facilities and jobs, providing more easy access to these services and also reducing the need to travel. Option 2 could also improve proximity to public transport modes and so encourage a reduction in car use in Lambeth. However, option 2 does limit the choice of potential build the rent tenants in terms of location. Build to rent offers a more long-term rental opportunity for tenants. Some may prefer to put down family roots/establish their sense of place in more suburban areas of the borough, rather than town centres and/or opportunity area earmarked for significant development. Some tenants may prioritise proximity to large parks and open spaces over proximity to high streets. Overall, it is considered important to locate build to rent schemes in areas with 'good' or higher public transport accessibility level ratings.</p> <p><b>Uncertainties/ Assumptions</b></p> <p><b>Recommendations/ Mitigation</b></p> <p>Sustainable transport schemes will need to be incorporated into new build to rent schemes that come forward in areas of the borough with lower levels of public transport accessibility. Alternatively, it may be appropriate to adapt option 1 so build to rent schemes may be encouraged borough-wide but in areas of 'good' or better PTAL rating. This may result in more positive effects overall.</p>	

## 1.5 Conversion of Family Homes

The current Local Plan protects family-sized homes from conversion into flats in streets where there's already a high number of conversions. Lambeth believes that it is possible to increase the overall amount of housing in Lambeth whilst maintaining this policy of protecting family homes from conversion.

The following table assesses two alternative options for managing family homes in Lambeth. Option 1 continues to protect these homes from residential conversions whereas option 2 allow them to be converted into flats.

### Assessment of Alternatives

<b>Issue 1.5 – Family Homes</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Continue to protect family homes from conversions to flats in streets under conversion stress (No change from current position)</li> <li>2. Allow conversion of family homes to flats to increase overall supply of housing in Lambeth</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Lack of family sized homes in the borough may lead to overcrowded living environments. Overcrowded living environments can cause ill health among occupants and also affect their mental health and wellbeing.
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.	Option 2 could enable more housing to be developed and so potentially increase the number of homes that are in close proximity to key services and facilities.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Option 2 could increase the overall number of home in the borough and thus increase the overall population. Such a population increase could increase pressure on existing infrastructure levels.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Option 2 could increase the overall number of homes in the borough however it may not significantly increase the number of affordable homes as conversions tend to only provide a small financial contribution towards affordable housing. Consequently, even though new, smaller units could come forward as part of option 2, it is questionable whether lower socio-economic groups would be able to afford them. Option 2 could also reduce numbers of

	family units and so harm families' ability to live in Lambeth.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	It is likely that option 2 will increase overall housing supply in Lambeth and therefore enable more people to enjoy a home. However, option 1 protects family sized homes and so will help to ensure that there is enough housing to meet the needs of families. Overcrowded housing does not enable enjoyment of the home.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	It is considered that option 1 is most likely to positively impact on this SA objective. In order for families to live in Lambeth, it is necessary to maintain a supply of family sized units. Such units better promote long term social cohesion and sustainable lifestyles as they reduce the likelihood of couples and/or young families having to move house in order to acquire a decent family sized home. Further, the subdivision of houses into flats can have negative impacts on environmental quality and local amenity – including through increased numbers of outdoors bins, parking congestion etc.
<b>Environmental</b>	
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.	The loss of family sized units could harm the quality, attractiveness, character and sustainability of the built environment by reducing the variety of home sizes in Lambeth, with associated effects like increased bins and vehicles on the streetscape. If conversions and the supply of more housing result in loss of garden/outdoor space; this will have adverse effects on the achievement of this SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.  Allowing unmanaged conversions of family dwellinghouses may result in more vehicles parking on residential streets.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	A higher number of homes could increase the pressure on existing green infrastructure across the borough and have a negative impact on this objective. Similarly, if conversions and the supply of more housing results in loss of garden space; this will have adverse effects on the achievement of this SA objective.
12 - Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the	A higher number of homes could potentially increase energy consumption in Lambeth residents. Option 2 could therefore increase greenhouse gas levels in Lambeth produced domestically and on more journeys. Subsequently option 2 could have a negative impact on

Borough for the unavoidable effects of climate change.	this objective. However the Lambeth Local Plan has policies to mitigate these effects.
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.	A higher number of homes could increase the pressure on existing water resources across the borough. Option 2 could also harm existing water management schemes in Lambeth and so may negatively impact on this objective. However the Lambeth Local Plan has policies to mitigate these effects.
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.	A higher number of homes could potentially increase the amount of waste produced by Lambeth residents and so option 2 may negatively impact on this objective. However the Lambeth Local Plan has policies to mitigate these effects.
15 - Air quality. To improve air quality	A higher number of homes could potentially increase the amount of waste produced by Lambeth residents, the overall amount of energy consumption in Lambeth and the number of trips undertaken in the borough. Consequently option 2 could harm air quality in Lambeth.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	A reduction in the number of family homes in Lambeth could mean that fewer families are able to live in the borough. Consequently option 2 could make it harder for families to access schools in Lambeth and families may be forced to move elsewhere. This could harm performance towards this objective.
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	Option 2 could positively impact on this objective by creating a higher number of homes and increasing the overall population size. This could provide local business with more customers and increase the employee pool and subsequently result in business growth.
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.	Option 2 could increase the number of homes on one site and therefore improve the efficiency of land.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Conclusions</b>	
Option 1 will protect family homes in Lambeth that are located on streets under conversion stress. This option will not increase Lambeth's housing supply however it will better enable	

more families to live in the borough and that could mean that communities develop more sustainably over longer periods of time. Option 2 on the other hand is likely to increase the borough's overall supply of homes and this could benefit the wider economy. However families could be forced to live elsewhere if there is not a sufficient supply of family sized units.

**Uncertainties/ Assumptions**

There are uncertainties around how demand for family sized units will evolve overtime.

**Recommendations/ Mitigation**

## 1.6 Gypsy and Traveller Accommodation

Evidence shows that need for gypsy and traveller accommodation in Lambeth can be met on the existing gypsy and traveller site in Streatham Vale. The following table assesses two alternative options for managing gypsy and traveller accommodation growth in Lambeth. Option 1 meets their need on the existing site in Lambeth whereas option 2 will meet the need on sites outside of the borough.

### Assessment of Alternatives

<b>Issue 1.6 – Gypsy and Traveller Sites</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Meet need for gypsy and traveller accommodation on the existing site in Streatham Vale.</li> <li>2. Not meet future need for gypsy and traveller accommodation in Lambeth.</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Option 1 is considered most likely to impact positively on this SA objective. The need for accommodation that has been identified is attributed to future household growth on the existing site. If this growth can be accommodated on the existing site it is more likely residents will have continuity of health care, schooling and be better able to maintain family and social networks.
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.	The impact on this SA objective is uncertain. The existing Streatham Vale site has a low PTAL score. Consequently meeting need for gypsy and traveller accommodation elsewhere could potentially improve resident's accessibility to key services and facilities, depending on location.
4 – Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
5 – Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Gypsies and travellers are considered a vulnerable group, liable to experience discrimination, poverty and social exclusion. The need for future gypsy and traveller accommodation will be met by both options. However, gypsies and travellers and relatives of gypsies and travellers residing in Lambeth, may prefer to remain in Lambeth. Accommodating them on a site outside of the borough would likely not promote culture of equity and fairness or reduce feelings of social exclusion of this population group. Nonetheless it is noted

	that the land supply assessment concluded that no suitable, available and achievable alternative site in Lambeth exists for gypsy and travellers, and this is why an alternative site in Lambeth is not considered a reasonable alternative.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	The need for future gypsy and traveller accommodation would in principle be met by both options and so it is not possible to differentiate between the relative merits of the alternative options against this objective.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	If the existing gypsy population on site were to grow over time, option 2 could result in the new population having to relocate outside of the borough. By meeting need for gypsy and traveller accommodation on the existing site, this could help to promote long term social cohesion. A growing gypsy population that cannot be accommodated on the existing site would unlikely result in feelings of long-term social cohesion and sense of place.
<b>Environmental</b>	
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.	Neither option is likely to impact on the quality, attractiveness, character and sustainability of Lambeth's built environment thus it is not possible to differentiate between the relative merits of the alternative options against this objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Biodiversity is unlikely to be significantly affected by option 1. Option 2 has the potential to harm biodiversity outside of Lambeth, depending on the location of the alternative site/s identified.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Option 1 means that other gypsy sites will not have to be extended/ new sites will not have to be created thus green infrastructure provision is less likely to be impacted on by option 1. Option 2 could potentially harm green infrastructure provision outside of the borough.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.

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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Option 1 is considered most likely to impact positively on this SA objective. The need for accommodation that has been identified is attributed to future household growth on the existing site. If this growth can be accommodated on the existing site it is more likely residents will have continuity of schooling and education.
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	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	If the existing Streatham Vale site is able to accommodate future gypsy and traveller accommodation growth, then the site could improve the efficient use of its land area. Similarly option 2 could improve the efficient use of land if sites are expanded/new sites are set up outside of the borough on land that is currently underutilised. Thus both options have the potential to aid performance toward this objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<p><b>Conclusions</b></p> <p>By meeting the need for gypsy and traveller accommodation on the existing site in Streatham Vale, Lambeth will not have to rely on sites outside of the borough to meet its need and therefore it can better ensure high quality accommodation for gypsies and travellers. Option 1 could also benefit the Lambeth economy by increasing the number of customers in Lambeth and by potentially increasing the size of its workforce. However this option could also increase pressure on existing infrastructure within Lambeth such as transport, water supplies and waste management. By meeting the need outside of the borough, Lambeth will have less control over how the need is met and existing communities and/or extended family may have</p>	



to move away from the Streatham Vale site. This could potentially harm social cohesion and Lambeth's ability to develop strong and sustainable communities however demand of Lambeth's existing infrastructure networks are likely to be less affected.

**Uncertainties/ Assumptions**

Assume that option 2 will meet future need for gypsy and traveller accommodation in locations outside of Lambeth.

**Recommendations/ Mitigation**

An alternative site within the borough may help mitigate adverse social effects on gypsy population if an additional site to Streatham Vale was required, rather than relying on a site outside of the borough. However, It is noted that the land supply assessment concluded that no suitable, available and achievable alternative site in Lambeth exists for gypsy and travellers, and this is why an alternative site in Lambeth is not considered a reasonable alternative.

## 1.7 Green Infrastructure

The Local Plan will continue to provide very strong protection for existing open spaces but there is not enough space in Lambeth to provide large new parks, like Brockwell Park or Clapham Common. Lambeth could seek more green infrastructure through new developments, like pocket parks, green roofs and walls, trees, food-growing spaces, riverside access, walks and links between parks, and nature conservation areas. Evidence shows that this type of space has very strong benefits for public health and well-being, nature conservation and managing flood risk.

The following table assesses two alternative options for delivering green infrastructure through new developments in Lambeth. Option 1 seeks more green infrastructure through such developments whereas option 2 does not.

### Assessment of Alternatives

<b>Issue 1.7 - Green Infrastructure</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Seek more green infrastructure through new developments</li> <li>2. Not seek more green infrastructure through new developments (no change to current policy)</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	By seeking more green infrastructure, option 1 has the potential to increase green infrastructure provision and better encourage residents to spend more time outside and potentially exercising. Higher levels of green infrastructure can improve mental health and wellbeing. It is likely that option 2 will not positively impact on this objective to the same extent as option 1.
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.	Provision of green infrastructure can help promote more walking and cycling. Urban greening and green walking and cycling routes can be designed to link spaces, making them more attractive to use and thus enables improved accessibility. Similarly provision of green infrastructure through new developments may make access to green space easier for older population groups and disabled groups.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Option 1 is likely to have a positive impact on this SA objective, through the delivery of more green infrastructure.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those	Proximity to green infrastructure can influence house prices so lower-socio economic groups may only be able to afford to live in areas where provision of green

<p>most liable to experience discrimination, poverty and social exclusion.</p>	<p>infrastructure is low or it is of poor quality. Option 1 seeks more green infrastructure through new developments and so could help to increase local green infrastructure provision through new developments. If this space is publically available it can be particularly important for disadvantaged groups who may not have access to private amenity space and so can help tackle social exclusion. Similarly provision of green infrastructure through new developments may make access to green space easier for older population groups and disabled groups. Green infrastructure (whether accessible or not) can help improve health and wellbeing of these groups as well.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>There are a number of different ways to incorporate green infrastructure into development that need not take up lots of space. Indeed it is considered that green infrastructure in housing developments provides houses that ensures a good standard of living and promotes a healthy lifestyle. Green infrastructure generally makes developments more attractive, and it attracts people to the site. Accordingly it is considered that positive effects will result through option 1.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>New green infrastructure can improve the sustainability of places and help to promote long-term social cohesion, sustainable lifestyles and a sense of place by providing spaces where people can meet, interact and exercise or just visually enjoy surrounding greenery. As option 1 seeks more green infrastructure through new developments, it is more likely to help performance towards this objective than option 2.</p>
<p><b>Environmental</b></p>	
<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>By seeking more green infrastructure through new development, option 1 could improve the attractiveness and sustainability of the built environment.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport</p>	<p>Provision of green infrastructure can help promote more walking and cycling. Urban greening and green walking and cycling routes can be designed to link spaces. Creating these 'Green Chains' of linked publically accessible open space which are easy to move between along attractive 'greened' streets or paths allows people to feel that they can travel through the urban area without leaving the open space. This significantly increases the perception of the amount of open space in the area.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>Wildlife habitats tend to be located within green spaces such as, parks, gardens, greens and other natural urban green spaces. Consequently, by seeking more green</p>

	infrastructure in Lambeth it is likely that opportunities for new wildlife habitats could increase and so biodiversity could be further enhanced. Seeking more green infrastructure through new developments is also likely to bring nature closer to people.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Option 1 has the potential to increase green infrastructure provision across the borough by seeking it through new development. This option could therefore potentially have a significant positive effect on this SA objective. Option 2 is not likely to enhance green infrastructure provision to the same extent.
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.	Green infrastructure can help to reduce greenhouse gases by absorbing carbon dioxide during photosynthesis. Green infrastructure can counter soaring summer temperatures in cities, thereby provide climate change adaptation benefits (particularly for vulnerable population groups like the elderly, and the very young). Consequently, when compared to option 2, option 1 is more likely to help reduce greenhouse gases and have a positive impact on this objective.
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.	More green infrastructure provision can help reduce flood risk by increasing the amount of permeable surfaces through which run off water can permeate through. Urban green spaces reduce pressure on drainage and flood defences. Therefore, in comparison to option 2, option 1 has greater potential to minimise flood risk in the borough.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	Green infrastructure can help to improve air quality by absorbing carbon dioxide during photosynthesis. Thus option 1 is more likely to improve air quality in Lambeth, as opposed to option 2.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	Environmental attractiveness draws in investment and jobs and enhances the value of property. Similarly there is evidence that views of natural landscapes can add up to 18% to property values (The Economic Value of Green Infrastructure 2008).
18 - Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and	More green infrastructure delivered through new developments could benefit deprived areas and communities.

<p>communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.</p>	<p>Green infrastructure can be delivered in a number of different ways (eg green walls, green roofs) that need not take space that could be otherwise used. Indeed there are many benefits of green infrastructure and the way in which it can underpin the success of economic sectors, offering an improved environment, jobs, sustainable business enterprises, social benefits, economic security and cost savings. These savings include a reduced need for healthcare, better employee productivity).</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>There is evidence that workers with access to green infrastructure are healthier and more productive (The Economic Value of Green Infrastructure 2008).</p>
<p><b>Conclusions</b>                  By seeking more green infrastructure through new development the borough is likely to benefit environmentally as green infrastructure provision could increase, air quality would likely improve and biodiversity levels could be enhanced. In turn option 1 could also help to provide more places for people to meet, socialise and exercise and so reduce social exclusion and better ensure sustainable healthy lifestyles. Green infrastructure provides a number of health and wellbeing benefits, even if it is not physically accessible (eg views of greenery improve health). Option 1 could also help to bring nature closer to people. Green infrastructure can be delivered in a number of different ways (eg green walls, green roofs) that need not take space that could be otherwise used. Indeed there are many benefits of green infrastructure and the way in which it can underpin the success of economic sectors, offering an improved environment, jobs, sustainable business enterprises, social benefits, economic security and cost savings. These savings include a reduced need for healthcare, better employee productivity and better adaptation for climate change. Therefore any viability assessment that suggests delivery of more green infrastructure on-site hinders development should be closely scrutinised. Large new parks will not be deliverable, but a balancing act between development and green infrastructure should certainly be met.                  More positive effects on SA objectives 2, 5, 7, 8, 9, 10, 11, 12, 13 and 15 are more likely to result from option 1 as compared to option 2.</p> <p><b>Uncertainties/ Assumptions</b>                  This assessment assumes that more green infrastructure provided through new development would be at least partly provided at ground floor level, but not at a level that reduces the amount of land for development. This appraisal has assumed that option 1 does not seek to deliver large new parks or open spaces as part of development-</p> <p><b>Recommendations/ Mitigation</b></p>	

## Topic 2: Affordable Housing

### 2.1 Threshold approach to affordable housing

Current Lambeth Local Plan policy requires 40 per cent of the housing units in a new development to be affordable, or 50 per cent where public subsidy is involved. This is subject to financial viability so if a developer can demonstrate that the full requirement will be too costly, they must provide the maximum amount of affordable housing possible. In exceptional circumstances, some affordable housing (AH) can be provided on another site or we may accept a financial contribution instead which can be put towards future delivery of affordable housing.

The Mayor of London has introduced a new ‘threshold approach’ to affordable housing across London: where a development can provide at least 35 per cent affordable housing on site and all other aspects of affordable housing policy are met, then the financial viability of the scheme will not be tested (known as the ‘Fast Track Route’). For proposals that don’t meet these requirements, the standard approach remains. The Mayor thinks this is likely to result in an increase in delivery of on-site affordable housing in larger schemes, which has recently been about 13 percent on average London-wide.

The following table assesses three alternative options for affordable housing thresholds in Lambeth.

#### Assessment of Alternatives

<b>Issue 2.1 Threshold approach to affordable housing</b>	
Reasonable alternatives:	
1. Do not test the financial viability of the scheme where the development provides at least 35% affordable housing on site and all other aspects of affordable housing policy are met.	
2. If any aspect of Local Plan policy on affordable housing is not met, development viability must be tested (no change to current approach).	
3. Lambeth should introduce a higher than 35% affordable housing threshold for Fast Track Route applications on industrial land released for housing.	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	It is not possible to differentiate between the relative merits of the alternative options on the achievement of this SA objective. It is considered that each option would have no effect on the achievement of the crime objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Research shows there are links between housing quality, better welfare and reduced costs to society (Ambrose 2002). Access to housing and residential stability can contribute to improved mental, emotional and physical health and wellbeing. More affordable housing options can also enable households to spend a greater share of their income on access to nutritious food, healthcare and other essentials that promote good health. It is considered

	<p>that the delivery of more affordable housing would have a significant positive effect on the achievement of this SA objective. It is difficult to conclude which policy approach is likely to deliver the greatest number of affordable homes, and thereby have the greatest positive impact. Option 1 may result in more affordable homes being delivered, by providing greater certainty to developers and embedding affordable housing requirements in land values. It may also incentivise developers to increase affordable housing levels rather than relying on viability assessments to justify lower delivery. Option 3 could similarly benefit the delivery of more affordable housing units in this way and should not detrimentally impact on the viability of schemes as the higher Fast Track threshold should be offset by lower initial land costs. However it is also possible the introduction of the threshold (options 1 and 3) could result in lost opportunities to maximise affordable housing in the event a scheme could viably deliver more than 35%, although evidence indicates that very few developments are actually delivering 35% affordable housing. Option 3 applies to industrial land. Health impact assessments will need to demonstrate no negative effects on health. The overall effect of these policy options on this SA objective is therefore uncertain. Monitoring of affordable housing delivery will be essential.</p>
<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>All of the alternative options have the potential to have a positive effect on this SA objective, by improving accessibility to housing and ensuring affordable housing as part of all housing schemes. As noted above, as options 1 and 3 are untested, it is difficult to conclude which policy approach is likely to deliver the greatest number of affordable homes. Option 3 applies to industrial land, so it may be possible that the location of some of these sites means access to key services and facilities is not as easy as other sites.</p>
<p>4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands</p>	<p>It is not possible to differentiate between the relative merits of the alternative options against this objective.</p>
<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Increasing the supply and range of affordable housing is likely to benefit all equalities groups, particularly those on low incomes. Option 3 on industrial land may result in more affordable housing available, however there will need to be due regard to design considerations, and access to services and infrastructure to ensure equitable outcomes for those in need of affordable housing. It will be</p>

	<p>important that any affordable housing on industrial land does achieve objectives to reduce poverty and social exclusion. Industrial land will need to be well connected to key services and infrastructure. While in principle lower value land ought to sustain a higher level of affordable housing; some industrial land may be more appropriate for housing and delivery of higher affordable housing numbers, than other areas of industrial land (in terms of amenity, access to services and facilities, access to jobs and health and wellbeing).</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>The delivery of more affordable housing would have a significant positive effect on the achievement of this SA objective. It is difficult to conclude which policy approach is likely to deliver the greatest number of affordable homes, and thereby have the greatest positive impact. Options 1 and 3 may result in more affordable homes being delivered, by providing greater certainty to developers and embedding affordable housing requirements in land values. These options may also incentivise developers to increase affordable housing levels rather than relying on viability assessments to justify lower delivery. Options 1 and 3 may also expedite the planning application process, such that development can come forward and people can move into new homes more quickly. However it is also possible the introduction of the threshold (options 1 and 3) could result in lost opportunities to maximise affordable housing in the event a scheme could viably deliver more than 35%, (although the risk is considered low as evidence indicates that very few developments are actually delivering 35% affordable housing). Overall it is considered that all three options will result in positive effects on the SA objective 6. Monitoring of affordable housing delivery will be essential.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>Option 3 seeks more affordable housing on industrial land released for housing via fast track process. Some industrial land will be more suitable for housing and affordable housing than other sites in terms of achieving social cohesion, sustainable lifestyles and creating a sense of place. It will be important that housing on industrial sites is limited to those that can achieve a sense of liveability and place, and a range of other sustainability objectives like health and wellbeing, equalities, and access to services. It is considered that all three options help promote interactions between different sectors of the community.</p>
<p><b>Environmental</b></p>	



<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>It is not possible to differentiate between the relative merits of the alternative options against this objective.</p> <p>It is considered there will likely be no effects of the options on the achievement of SA objective 8.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport</p>	<p>It is not possible to differentiate between the relative merits of the alternative options against this objective.</p> <p>It is considered there will likely be no effects of the options on the achievement of SA objective 9.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>It is not possible to differentiate between the relative merits of the alternative options against this objective.</p> <p>It is considered there will likely be no effects of the options on the achievement of SA objective 10.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>It is not possible to differentiate between the relative merits of the alternative options against this objective.</p> <p>It is considered there will likely be no effects of the options on the achievement of SA objective 11.</p>
<p>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>	<p>It is not possible to differentiate between the relative merits of the alternative options against this objective.</p> <p>It is considered there will likely be no effects of the options on the achievement of SA objective 12.</p>
<p>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>	<p>It is not possible to differentiate between the relative merits of the alternative options against this objective.</p> <p>It is considered there will likely be no effects of the options on the achievement of SA objective 13.</p>
<p>14 - Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.</p>	<p>It is not possible to differentiate between the relative merits of the alternative options against this objective.</p> <p>It is considered there will likely be no effects of the options on the achievement of SA objective 14.</p>
<p>15 - Air quality. To improve air quality</p>	<p>It is not possible to differentiate between the relative merits of the alternative options against this objective.</p> <p>It is considered there will likely be no effects of the options on the achievement of SA objective 15.</p>
<p><b>Economic</b></p>	

<p>16 - Education and skills. To maximise the education and skills levels of the population.</p>	<p>It is not possible to differentiate between the relative merits of the alternative options against this objective.</p> <p>It is considered there will likely be no effects of the options on the achievement of SA objective 16.</p>
<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>All three options have the potential to positively impact on this SA objective. By delivering more affordable housing units, residents could potentially have more money to spend and thus benefit local businesses and help drive a dynamic local economy. Options 1 and 3 may expedite the planning application process, such that development can come forward more quickly, with associated positive impacts for the local economy.</p>
<p>18 - Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.</p>	<p>Option 3 would likely result in positive effects on the achievement of SA objective 18. Releasing industrial land for housing, and requiring higher levels of affordable housing on that land, seeks to stimulate regeneration and would reflect the relative difference in land values, and have the potential to provide benefits to the most deprived areas and communities.</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>Effects of option 3 are dependent on the location of industrial land relative to employment opportunities. It may result in occupiers of affordable housing (and indeed market housing) with reduced access to employment generating activities or it may result in positive effects if an industrial site is released for housing that is surrounded by employment generating landuses. Effects of option 3 are therefore considered uncertain. However, option 3 will involve mixed used development, providing some employment opportunity at the same time as housing.</p>
<p><b>Conclusions</b></p> <p>Option 1 allows schemes where the development provides at least 35% affordable housing on site and all other policy requirements are met to follow the 'Fast Track Route'. This may help to provide developers with more certainty and could result in a shorter determination period for the planning application. A greater amount of affordable housing could be delivered this way by incentivising developers to meet the threshold rather than have lengthy negotiations around development viability. Option 1 is likely to result in positive effects on SA objectives 2, 3, 5, 6, 7, and 17.</p> <p>Option 3 could similarly introduce a 'Fast Track Route' on former industrial land albeit at a higher than 35% threshold and so could potentially expedite affordable housing delivery in the same way as option 1 and may also result in a higher proportion of affordable units. Subsequently a greater number of households, including those in the most deprived areas and communities, could have more opportunities to live in affordable accommodation in their neighbourhoods. This could result in cumulative health and financial benefits. If not designed and delivered in a sensitive and sustainable manner, option 3 may result in adverse effects on SA objective 5.</p>	

Health impact assessments will need to demonstrate no negative effects on health from the previous industrial land use. Industrial sites close to existing services, facilities and infrastructure are preferred over other sites not accessible to these services. A criteria based approach is recommended for the release of industrial land to housing. Option 3 is likely to result in positive effects on SA Objectives 2 (subject to health impact assessment/mitigation), 3, 5 (subject to design and health mitigation), 6, 7 (subject to location), 17, 18 and 19.

Option 2 will test development viability if any aspect of Local Plan policy on affordable housing is not met. Consequently it is possible that greater amount of affordable housing could be provided in each scheme, and/or off-site delivery or payments in lieu might be achieved. However, in recent years the Mayor's evidence shows this approach has resulted in just 15% on average of on-site affordable housing across London as a whole. Option 2 is likely to result in positive effects on SA Objectives 2, 3, 6, 7, and 17.

**Uncertainties/Assumptions**

Option 3 has uncertain effects against some sustainability objectives because the location, and relationship to other land and services of industrial land is not known. Effects will differ from site to site.

**Recommendations/ Mitigation**

A criteria based approach is recommended for the release of industrial land to housing. To further enhance positive effects of Option 3 (particularly with respect to access to services and employment) it might be appropriate to release industrial land for mixed use development that includes housing, rather than single-use housing development.

## 2.2 Affordable Housing on small sites

The existing Local Plan requires developments involving fewer than 10 homes to provide a financial contribution towards affordable housing, subject to financial viability. The government is concerned that this type of policy will prevent small housing developments coming forward. In the year ending March 2016 developments of ten or fewer homes in Lambeth accounted for about a third of all new housing. Given the high level of need for affordable housing, these smaller schemes could contribute towards provision of affordable housing if financially viable.

### Assessment of Alternatives

<b>Issue 2.2 - Affordable Housing on small sites</b>	
Reasonable alternatives:	
1. Require a financial contribution towards affordable housing from developments involving fewer than 10 homes, subject to viability	
2. Do not require a financial contribution towards affordable housing from developments involving fewer than 10 homes	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	High quality, affordable housing is a key determinant of health. More affordable housing creates more opportunities for local people to live in Lambeth. Option 1 could help to deliver more affordable homes in Lambeth and so could generate positive effects (directly or indirectly) on health and wellbeing.
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.	Option 1 has the potential to have a positive effect on this SA objective, by improving accessibility to housing.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Option 1 has the potential to increase the amount of affordable housing funding that comes forward from schemes involving fewer than 10 homes, by requiring a financial contribution. An increase in such funds could help to deliver more affordable homes for all communities, and thus benefit the most economically deprived communities, i.e. those most liable to experience discrimination, poverty and social exclusion.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of	Option 1 has the potential to increase funds available to deliver affordable units and so it could ensure more affordable decent homes are delivered in Lambeth. The delivery of more affordable housing would have a

local amenity.	positive effect on the achievement of this SA objective.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Environmental</b>	
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.	The quality, attractiveness, character and sustainability of the built environment could be improved by new development. Similarly option 1 could benefit the objective by helping to deliver more affordable housing schemes.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA

	objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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	Option 1 could enable more (affordable) housing units to be delivered in Lambeth over the course of the plan period. New residential development could benefit the economy by providing local businesses with more customers and a larger employment pool. They can also improve the attractiveness of areas and lead to further inward investment.
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.	Option 1 could have a positive impact on this objective by helping to fund more affordable units. Option 2 could potentially have a negative impact on this objective if, rather than optimising site capacity, it resulted in development proposals providing fewer than 10 units in order to avoid triggering affordable housing policies.
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.	It is considered that new, well-located, affordable housing could improve access to employment opportunities for those out of work. Option 1 could therefore have a positive impact on this objective.
<p><b>Conclusions</b> By requiring a financial contribution towards affordable housing from developments involving fewer than 10 homes, subject to viability, option 1 has the potential to enable more affordable units to be delivered in the future across the borough. Option 1 is likely to result in positive effects on the achievement of SA Objectives 2, 3, 5, 6, 17, 18, and 19.</p> <p>Option 2 does not require affordable housing contributions from schemes that may be able to afford them. In turn, option 2 could possibly result in sites capable of delivering more than 10 units being underdeveloped. For example, a developer could try and develop fewer than 10 homes on a site so that they do not have to pay towards affordable housing. Consequently the maximum number of homes that could be delivered on site may not result from option 2. Potential negative effects on the achievement of SA objective 18 may result.</p> <p><b>Uncertainties/Assumptions</b> This assessment assumes that, in comparison to option 2, option 1 will increase the amount of financial contributions towards affordable housing that Lambeth receives.</p> <p><b>Recommendations/ Mitigation</b></p>	

## 2.3 Workspace vs affordable housing

The Local Plan needs to strike the right balance between housing and jobs. Securing affordable workspace within new development can sometimes impact on the amount of affordable housing that can be secured.

### Assessment of Alternatives

<b>Issue 2.3 - Affordable workspace vs affordable housing</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Prioritise affordable workspace for small businesses over affordable housing if it is not possible to provide both</li> <li>2. Prioritise affordable housing over affordable workspace for small businesses if it is not possible to provide both</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Option 1 may result in community safety benefits as new workspaces could increase on-street activity and daytime surveillance levels. However more crimes tend to occur at night-time and therefore the introduction of housing, in place of workspaces, could help to improve safety in the immediate vicinity by increasing 'eyes on the street' surveillance and increasing night-time activity in the local area.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Employment can have potential positive effects on people's health (including mental health) and wellbeing (e.g. through improved access to jobs). If the provision of affordable workspace creates job opportunities for local people, option 1 could generate positive effects (directly or indirectly) on health and wellbeing. Similarly more affordable housing creates more opportunities for local people to live in Lambeth. High quality, affordable housing is a key determinant of health and so option 2 could generate positive effects (directly or indirectly) on health and wellbeing.
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.	Option 2 could help to deliver more housing in Lambeth and improve residents' access to services, jobs and amenities. By helping to deliver more workspaces, accessibility to jobs is likely to be improved by option 1, thus both options could have a positive impact on this objective.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those	Options 1 and 2 both have the potential to impact positively on this SA objective. In order to promote fairness between different population groups,

most liable to experience discrimination, poverty and social exclusion.	Lambeth could provide more workspaces to increase overall employment opportunities in the borough. Such employment opportunities could help to reduce poverty and social exclusion and so option 1 could have a positive impact on this objective. Option 2 will likely benefit equalities groups through the delivery of additional affordable homes.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Option 2 is likely to provide more affordable homes in Lambeth and therefore better ensure that everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity. This option could therefore potentially have a significant positive effect on this SA objective. Option 1 could negatively impact on this objective if affordable workspace is provided at the expense of new affordable homes.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place.	The provision of new workspaces and housing both have the potential to impact positively on liveability and place. For example they could enhance the mix of uses in the local area and promote interactions between different sectors of the community.
<b>Environmental</b>	
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.	All new development has the potential to impact upon the landscape of Lambeth however the existing Lambeth Local Plan already has policies to manage impacts on, and improve the quality and character of the built and historic environment. Accordingly, neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.



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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	By prioritising affordable workspaces over affordable housing, option 1 could enable more small businesses to move to Lambeth and allow existing small businesses to grow. Both of these potential benefits can help to sustain prosperity and grow dynamic local economies.
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.	Both options have the potential to positively impact on this objective, by either delivering more affordable homes which can provide more opportunities for the most deprived communities to access or rent their home, or by creating more affordable workspaces. These could also benefit the most deprived areas and communities by potentially providing them with more job opportunities and more spaces to work in.
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.	Option 1 could help to more directly tackle worklessness by providing more affordable workspaces across the borough and therefore allow further business growth. Conversely option 2 is likely to result in more affordable housing units and less affordable workspace being provided in the borough. While this may have less of a direct positive effect in terms of this objective, new housing can improve access to employment, by enabling more people to better access jobs in the borough and, more widely, jobs in London.
<p><b>Conclusions</b></p> <p>By prioritising the development of new affordable workspaces, small businesses should be better able to set up in Lambeth and moreover, existing small business could have more opportunities to grow. Therefore this option could better enable the development of strong and dynamic local economies and improve the social and environmental performance of businesses. Option 2 prioritises affordable housing and so has the potential to deliver a greater number of affordable homes in the borough which can help Lambeth to meet priority</p>	

housing need.

Both options can produce positive effects on SA objectives 1, 2, 3, 5, 7 and 18. Option 1 is likely to result in more positive effects than option 2 on the local economy, whilst option 2 is likely to produce more positive effects than option 1 on the boroughs housing levels. Some areas of the borough might benefit more from prioritising affordable workspace over affordable housing, and likewise, some areas may benefit more from prioritising affordable housing over affordable workspace. It is recommended that this is further explored.

**Uncertainties/ Assumptions**

Assume that option one will help to provide more job opportunities for all of Lambeth's communities including the most deprived ones.

**Recommendations/ Mitigation**

Rather than a borough-wide approach, are there certain areas in the borough that would benefit more from prioritising affordable workspace over affordable housing, and other areas that would benefit more from prioritising affordable housing over affordable workspace?

## 2.4 Tenure split in affordable housing

There are many different types of affordable housing, beyond traditional social rented accommodation, and eligibility is determined by household income. Newer ‘intermediate’ products for those on middle incomes include Discount Market Rent, and options for affordable home ownership. We still need to make sure enough affordable housing is provided for people on the lowest incomes and there is concern that social rented housing will get squeezed out by the newer types of affordable housing aimed at middle income households.

### Assessment of Alternatives

<b>Issue 2.4 Tenure split in affordable housing</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Secure more affordable housing for those on the lowest incomes, even if this means securing less affordable housing overall</li> <li>2. Secure more affordable housing overall but with a smaller amount for those on lower incomes</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Both options are likely to have a positive impact on this SA objective by improving access to affordable housing, with associated health and wellbeing benefits.
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.	Option 1 would potentially improve access to housing for a smaller number of households, but those on the lowest incomes. Option 2 would improve access to housing for a greater number of households overall.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Option 1 has the potential to secure more affordable housing for those on the lowest incomes and so this option could better enable the poorest populations in Lambeth to access or rent their own home and lead to more equitable outcomes for communities that could be most liable to experience discrimination, poverty and social exclusion. However option 1 could reduce the overall quantum of affordable housing produced on site and thus overall, reduce the ability of wider population to access or rent their own home. Conversely option 2 could secure more affordable housing overall but with a smaller amount for those

	on lower incomes. This is likely to result in more people being able to afford to access or rent their own home, however, fewer homes will be delivered that are general affordable for the poorest communities.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	To ensure that everyone has the opportunity for an affordable decent home, Lambeth needs to deliver as many affordable units as possible. In purely quantitative terms option 2 would therefore appear likely to have a greater positive impact on this SA objective. However, the relative 'affordability' of different tenures means that option 1 could better enable lower socio-economic groups in Lambeth to access housing.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Environmental</b>	
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.

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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Option 1 could better stimulate regeneration that maximises benefits to the most deprived areas and communities by providing more opportunities for them to access or rent housing. Conversely option 2 may deliver fewer homes that are affordable to the most deprived communities and so regeneration of the areas could be harder to stimulate.
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.	New housing can improve access to employment, by enabling more people to better access jobs in the borough and, more widely, jobs in London. Both options therefore have the potential to positively influence this SA objective. However, option 1 is considered more likely to deliver a greater number of homes that would be affordable to those out of work.
<p><b>Conclusions</b></p> <p>To ensure that everyone has the opportunity for an affordable decent home, Lambeth needs to deliver as many affordable units as possible. In purely quantitative terms option 2 would therefore appear likely to have a greater positive impact on providing housing. However, the relative 'affordability' of different tenures means that option 1 could better enable lower socio-economic groups in Lambeth to access housing.</p> <p>Option 1 could potentially secure more affordable housing for those on the lowest incomes, even if this means securing less affordable housing overall. Consequently the most deprived communities could have more opportunities to find an affordable home in Lambeth. However option 1 could reduce the overall quantum of affordable housing produced on site and thus overall, reduce the ability of wider population to access or rent an affordable home. On the other hand, option 2 may secure more affordable housing overall but with a smaller amount for those on lower incomes and thus more people should benefit from this option. However the most deprived communities are likely to have fewer opportunities to be able to find an affordable home and they are less likely to be able to afford to live in a higher proportion of the units provided.</p> <p>Both options are likely to result in positive effects on SA objectives 2, 3 and 6. Option 1 is considered more likely to result in positive effects on SA objectives 5 and 18 than option 2.</p>	

**Uncertainties/Assumptions**

**Recommendations/ Mitigation**

## 2.5 Affordable housing in estate regeneration schemes

Housing estate regeneration schemes in Lambeth are currently required to provide 50% affordable housing overall in the finished scheme. In some circumstances, there may be a case for allowing a lower proportion of affordable housing overall to secure a higher proportion of homes for those on the lowest incomes. However, this would never involve allowing an overall loss in the amount of affordable housing originally provided on an estate.

### Assessment of alternatives

<b>Issue 2.5 - Affordable housing in estate regeneration schemes</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Always require 50% affordable housing overall in a finished estate regeneration scheme (No change to current position)</li> <li>2. Sometimes accept less than 50% affordable housing overall in order to deliver a higher proportion of affordable housing at council rents for those on the lowest incomes</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Both options are likely to have a positive impact on this SA objective by improving access to affordable housing, with associated health and wellbeing benefits.
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.	Option 1 would improve access to housing for a greater number of households overall. Option 2 would potentially improve access to housing for a smaller number of households, but those on the lowest incomes.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	<p>Option 1 requires 50% affordable housing in a finished estate regeneration scheme thus, overall, more people could be able to find an affordable home. Therefore option 1 could result in more equitable outcomes for all communities. However, this option is likely to deliver fewer homes that will be accessible to those on very low household incomes.</p> <p>Conversely, option 2 could better enable equitable outcomes for communities with very low household incomes by providing more units at council rents. However, this option is likely to</p>

	result in a lower overall quantum of affordable housing being delivered.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	To ensure that everyone has the opportunity for an affordable decent home, Lambeth needs to deliver as many affordable units as possible. In purely quantitative terms option 2 would therefore appear likely to have a greater positive impact on this SA objective. However, the relative 'affordability' of different tenures means that option 1 could better enable lower socio-economic groups in Lambeth to access housing.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	It is considered that option 2 promotes mixed social environments, long-term social cohesion and sense of place for populations in need of affordable housing, and populations in need to council rents housing.
<b>Environmental</b>	
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
14 - Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling,	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.



remanufacturing and recovery rates.	
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	To maximise the benefits to the most deprived areas and communities in regeneration schemes, such as estate regeneration schemes, as many homes as possible that are truly affordable for the poorest communities should be provided. Option 2 could help to deliver the highest number of homes that benefit the most deprived communities and so positively impact on this objective.
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.	New housing can improve access to employment, by enabling more people to better access jobs in the borough and, more widely, jobs in London. Both options therefore have the potential to positively influence this SA objective. However, option 2 is considered more likely to deliver a greater number of homes that would be affordable to those out of work.
<p><b>Conclusions</b></p> <p>Of the two options, option 1 is likely to secure more affordable housing overall in finished estate regeneration schemes, thus more households should benefit from this option. However option 1 may mean delivery of fewer genuinely affordable (i.e. council rent) homes for populations on the lowest incomes meaning the most deprived communities are likely to have fewer opportunities to be able to find an affordable home. On the other hand, option 2 could secure more affordable housing for those on the lowest incomes, even if this means securing less affordable housing overall. Consequently the most deprived communities may have more opportunities to find an affordable home.</p> <p>Option 2 has the benefit of providing both some affordable housing, and some council rents housing for those on lowest incomes.</p> <p><b>Uncertainties/Assumptions</b></p> <p><b>Recommendations/ Mitigation</b></p> <p>Policy makers could consider a minimum percentage of affordable housing for option 2. For example, 'sometimes accept less than 50% but not less than 35% of affordable housing overall in order to deliver a higher proportion of affordable housing at council rents'.</p>	

## 2.6 Type of affordable housing in Private Rented housing Schemes (PRS)

The government thinks developments for private rented housing (PRS) should only need to provide affordable housing for households on 'intermediate' incomes. Lambeth thinks in some cases developers can and should provide social rented units for people on the lowest incomes in this type of development.

Assessment of alternatives

<b>Issue 2.6 Type of affordable housing in PRS schemes</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Allow all affordable housing in PRS schemes to be intermediate affordable</li> <li>2. Require social/affordable rented units in addition to 'intermediate' units in PRS schemes, where feasible and viable</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Both options are likely to have a positive impact on this SA objective by improving access to affordable housing (albeit to different groups), with associated health and wellbeing benefits.
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.	Both options are likely to have a positive impact on this SA objective by improving access to affordable housing.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	By requiring social/affordable rented units, where feasible and viable, in addition to 'intermediate' units in PRS schemes, option 2 could benefit more people on lower incomes by delivering units that are truly affordable for communities that are most liable to experience discrimination, poverty and social exclusion (i.e. the lowest socio-economic groups).
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Both options are likely to have a positive impact on this SA objective by improving access to affordable housing. Option 2 requires a wider range of affordable units to be provided and so a wider range of people could have the opportunity for an affordable decent home, quiet enjoyment of that home.
7 - Liveability and place. To design and sustain liveable, mixed-use	Option 2 is more likely to offer a greater mixed social environment, benefiting a wider range of people.

physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	
<b>Environmental</b>	
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.

levels of the population.	
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	The homes delivered under option 1 are likely to be occupied by households with higher (relatively) incomes. This may result in benefits to the local economy, as occupants may have more disposable income.
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.	To maximise the benefits to the most deprived communities as many homes as possible that are truly affordable should be provided. Option 2 could help to deliver homes that benefit the most deprived communities (social/affordable) and so positively impact on this objective.
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.	New housing can improve access to employment, by enabling more people to better access jobs in the borough and, more widely, jobs in London. Both options therefore have the potential to positively influence this SA objective. However, option 2 is considered more likely to deliver homes that would be affordable to those out of work.
<p><b>Conclusions</b> Option 1 allows all affordable housing in PRS schemes to be intermediate affordable whereas option 2 also requires social/affordable rented units to be provided where feasible and viable. Consequently, option 2 is more likely to benefit those on the lowest incomes (who can also be more likely to experience discrimination, deprivation and social exclusion) as more homes are likely to be provided that they can afford to live in. Accordingly, option 2 offers more positive effects on a number of sustainability objectives (e.g. SA objectives 5, 6, 7, 18 and 19).</p> <p><b>Uncertainties/Assumptions</b> Assume that option 1 conforms to London Plan policy and only requires developers to deliver discounted market rent (DMR) units.</p> <p><b>Recommendations/ Mitigation</b></p>	

## 2.7 Affordable Housing Mix

Currently the Local Plan outlines that between 20% – 50% of units delivered in the affordable housing element of residential developments should be two-bedroom units. However, affordable housing demand studies suggest that the need for smaller affordable housing units with two bedrooms will increase over time.

### Assessment of Alternatives

<b>Issue 2.7 Affordable Housing Mix</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Require between 20% to 50% of new affordable units to be two bedroom units (No change to current position)</li> <li>2. Increase the proportion of new affordable units required to be two bedroom units</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	It is not possible to differentiate between the relative merits of the alternative options against this objective.
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.	It is not possible to differentiate between the relative merits of the alternative options against this objective.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	In order to ensure equitable outcomes for all communities, Lambeth should provide a mix of affordable units that mirrors the need for affordable housing. Evidence suggests that the need for two bedroom affordable units will increase over time. Option 2 has the potential to respond to this, by increasing the proportion of new affordable units delivered and thereby have a positive impact on this objective.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Option 1 requires 20-50% of affordable housing provided to be two-bedroom units however new evidence suggests that demand for affordable two bedroom units will increase over time. Consequently, seeking a higher proportion of two-bed units (option 2) could better ensure that more people have the opportunity for an affordable decent home.

7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Environmental</b>	
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
17 - Local economy. Create and sustain	Neither of the alternative options are envisaged to

<p>prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses</p>	<p>have a significant effect on the achievement of this SA objective.</p>
<p>18 - Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</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>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p><b>Conclusions</b>                  Option 1 outlines current Local Plan policy which requires between 20-50% of new affordable units to be two bedroom units. Research suggests that the need for two bedroom affordable units is likely to increase over time. Option 2 proposes to increase the proportion of new affordable two bedroom units delivered through new developments so it could lead to more equitable affordable housing outcomes for all households.</p> <p><b>Uncertainties/Assumptions</b>                  Option 2 will increase the proportion of new affordable units required to be two bedroom units however it does not state by how much.</p> <p><b>Recommendations/ Mitigation</b>                  Recommend that option 2 states exactly what proportion of new affordable homes it proposes to be two bedroom units based on the evidence suggesting there is a need for more more two-bed affordable units.</p>	

## 2.8 Affordable Housing in Student Housing Developments

The current Local Plan does not require affordable housing for the wider population in student housing developments. For developments involving specialist student accommodation, Lambeth is now considering requiring some affordable housing provision to help meet wider housing need in the borough.

### Assessment of Alternatives

<b>Issue 2.8 Affordable Housing in Student Housing Developments</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Do not require affordable housing for the wider population in specialist student housing developments (No change to current position)</li> <li>2. Require some affordable housing for the wider population in specialist student housing developments</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	High quality, affordable housing is a key determinant of health. More affordable housing creates more opportunities for local people to live in Lambeth. Option 2 could help to deliver more affordable homes in Lambeth and so could generate positive effects (directly or indirectly) on health and wellbeing.
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.	Both options have the potential to positively impact on this SA objective, by improving accessibility to housing (either to students, or to those requiring affordable housing).
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	It is considered that option 2 is most likely to benefit equalities groups, by increasing the availability of homes to people on low incomes. Option 2 could potentially adversely affect student groups, as it is likely to result in fewer student units being provided.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Both options have the potential to positively impact on this SA objective, by improving accessibility to housing (either to students, or to those requiring affordable housing).
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.



lifestyles and a sense of place.	
<b>Environmental</b>	
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Option 1 could have a greater positive outcome in terms of this objective, in that it is likely to result in the delivery of more accommodation for students in the borough.
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	Both options have the potential to positively impact on this SA objective, as occupants of the new developments will benefit the local economy.
18 - Regeneration and efficient use of	Neither of the alternative options are envisaged to

<p>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.</p>	<p>have a significant effect on the achievement of the SA objective.</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>It is considered that new, well-located, affordable housing could improve access to employment opportunities for those out of work. Option 2 could therefore have a positive impact on this objective, although it is also noted that students may be in employment while studying.</p>
<p><b>Conclusions</b> Affordable housing is a key issue for the Lambeth Local Plan review, with a view to increasing delivery and helping to meet unmet housing need. Option 2 contributes more towards this goal than option 1. Overall, it is considered that more positive effects on SA objectives result from Option 2.</p> <p><b>Uncertainties/ Assumptions</b> It is unclear why it is proposed, as an option, to require affordable housing as part of student housing developments but not as part of other types of housing meeting specific community needs, for example care homes, or hostels or houses in multiple occupation.</p> <p><b>Recommendations/ Mitigation</b> Option 2 could be amended to read 'Require some affordable housing for the wider population in specialist student housing developments, where feasible and viable'.</p> <p>Further options that may be worth exploring are:</p> <ul style="list-style-type: none"> <li>- To collect a financial contribution towards the delivery of off-site affordable housing;</li> <li>- To seek affordable housing from developments providing housing to meet specific community needs and developments for hostels and houses in multiple occupation.</li> </ul> <p>If option 2 is the preferred approach, the council would need to consider why student housing developments are required to contribute towards affordable housing targets but other types of non-conventional housing developments are not.</p>	

## Topic 3: Housing and Older People

### Issue 3.1 Specialist Housing

The London Plan requires all new housing to be built to 'Lifetime Homes' standards, so that more people can stay in their homes for longer. Similarly, adapting existing housing is strongly supported.

The current Lambeth Local Plan already supports housing to meet specific community needs such as extra care housing and residential care homes. This has resulted in a good supply of specialist housing for older people on lower incomes in Lambeth, including two schemes for low cost shared ownership. The current Lambeth Local Plan allows extensions and annexes to existing houses, within certain limits on design and protection for gardens but it doesn't currently address specialist retirement housing for sale or the potential to release family-sized market housing through down-sizing.

Providers of specialist housing for older people argue they should be granted exemptions from normal contributions to affordable housing and infrastructure as they cannot compete with general needs housing for available land (because general needs housing generates higher values).

#### Assessment of Alternatives

<b>Issue 3.1 – Specialist Housing in Lambeth</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Support specialist retirement housing for sale to encourage more affluent older people to down-size to smaller accommodation if they want to, to release larger family-sized homes</li> <li>2. Exempt providers of specialist housing for older people from normal contributions to affordable housing and infrastructure</li> <li>3. Encourage more semi-communal living as a way of preventing loneliness and isolation among older people.</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Inadequate housing can cause or contribute significantly to the health and wellbeing outcomes of older people; for example, larger and older homes can have high heating and repair costs and present trip and fall hazards. By increasing the availability of housing options for older people who wish to move to purpose-built specialist accommodation, and possibly families, all three options are likely to positively impact on this SA objective. By encouraging more semi-communal living as a way of preventing loneliness and isolation, option 3 could have a positive impact on this objective by potentially reducing older people's propensity to suffer from mental health issues.
3 - Access and services. Create an environment that is accessible to and fully	If it is accepted that specialist housing providers should be exempt from having to pay developer contributions, option 2 could enable more specialist housing to be developed, by

<p>inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.</p>	<p>making schemes more viable, and akin to option 1, this could help to provide more specialist retirement housing that better caters to access requirements of older people. Option 3 is not predicted to have a significant effect on the achievement of the SA objective. Positive impacts on this SA objective could be enhanced by ensuring new specialist accommodation for older people is located close to shops and services and in areas with reasonable public transport accessibility.</p>
<p>4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands</p>	<p>If it is accepted that specialist housing providers should be exempt from having to pay developer contributions, option 2 could potentially reduce the amount of funds available to spend on infrastructure and thus potentially negatively impact on this objective.</p>
<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Developing more specialist housing across Lambeth is likely to better ensure equitable outcomes for older people as more specialist units could ensure that they have a higher chance of living in a home that specifically caters to their needs. Thus both options 1 and 2 have the potential to aid performance towards this objective. Option 2 could however result in less affordable housing being delivered, with an associated potential negative impact particularly on lower income equalities groups. Option 1 could enable Lambeth to accommodate more families, as larger family sized homes could be released resulting in more equitable outcomes for families. Option 3 could help to reduce social exclusion and positively impact on this objective.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>Developing more housing, including specialist housing, should better enable Lambeth to provide decent homes to all of its residents. Option 1 can help in this way as could option 2 by making schemes more viable. However, option 2 could also result in less affordable housing (either conventional or affordable housing for older people) and therefore have a negative impact on this SA objective. Option 1 could enable more family sized units to come forward and so ensure that families have more opportunities to live in Lambeth. Option 3 could enable more residents to enjoy their home through semi communal living.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>Option 3 could help to provide more semi-communal units across Lambeth that help to prevent loneliness and isolation. Consequently this option can help to deliver more social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place. Option 2 could also benefit Lambeth in this way by making specialist housing schemes for older people more viable and so potentially increase the overall number of such units.</p>
<p><b>Environmental</b></p>	
<p>8 - Built and historic environment. Improve the quality, attractiveness,</p>	<p>All new development could impact upon the landscape of Lambeth however the existing Lambeth Local Plan already has</p>

character and sustainability of the built environment through high quality design and protection of open space, valued views and historic assets.	<p>policies to manage impacts on, and improve the quality and character of the built and historic environment.</p> <p>So long as these policies are abided to, there does not appear to be significant differences between the alternative options regarding potential impacts on this SA objective.</p>
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	If it is accepted that specialist housing providers should be exempt from having to pay developer contributions, option 2 could potentially reduce the amount of funds available to spend on infrastructure and so funds available for new transport projects for example could be harmed.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.

<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>Generally, more residential development is likely to increase the overall population. Higher populations can result in economic growth as local businesses have larger employment pools and bigger customer bases and so all of the options could benefit the objective in this way. Option 1 could also enable more families to live in Lambeth, potentially increasing the size of the working population and further benefiting local businesses. This option could also potentially help to diversify Lambeth's age demography and so attract a wider range of businesses to Lambeth.</p>
<p>18 - Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.</p>	<p>If it is accepted that specialist housing providers should be exempt from having to pay developer contributions, option 2 could enable more specialist housing to be developed, by making schemes more viable. This option could therefore potentially improve efficiency in land use through the re-use of previously developed land and existing buildings. In turn option 2, and 1, could enable more development to occur which can often help to stimulate further regeneration in surrounding areas.</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>Specialist accommodation facilities, as supported through option 1, are likely to generate job opportunities and thus increase the amount of, and consequently access to, employment generating activities.</p>
<p><b>Conclusions</b> Option 1 has the potential to provide specialist housing for older people and also enable more families to live in the borough by releasing family sized homes. This could help to diversify the age structure and benefit local businesses and the wider economy. If it is accepted that specialist housing providers should be exempt from having to pay developer contributions, this could also help to increase the number of specialist homes for older people in Lambeth and thus better enable the borough to meet current and future demands for older people's housing. However, this is also likely to result in less affordable housing to meet general needs being delivered. More semi-communal living could help to prevent loneliness and social isolation among older people which would contribute positively to health and wellbeing.</p> <p><b>Uncertainties/Assumptions</b> There is uncertainty around whether or not specialist housing providers are able to provide developer contributions or not. It has been assumed that the specialist units proposed will provide high quality units that cater to the specific needs of older people. It has also been assumed that units provided as part of option 3 will be fully accessible and cater to the specific needs of older people.</p> <p><b>Recommendations/ Mitigation</b> Methodology for determining contributions could be reviewed for older people's specialist housing, for example, a flat rate contribution or a calculation that would be less than that required from market housing. It is recommended alternative methods for a contribution are further explored for applicants of older persons housing.</p>	

## Topic 4: Self-build and custom housebuilding

### Issue 4.1:

Local planning authorities are required to grant planning permission for enough serviced plots of land to meet demand for self-build and custom housebuilding. To understand demand the council maintains a register of people and groups who wish to commission or build their own homes.

Lambeth's Local Self-Build Register indicates a high level demand for plots of land for self-build. The council has not, to date, set out local eligibility criteria for joining the self-build register, though national regulations were recently introduced to allow local authorities to do this.

It will be challenging to deliver serviced plots for self-build housing in Lambeth, particularly given the limited size, high value, and competing demands on development sites. There are no large areas of unused, underused or cleared land in Lambeth that would provide an immediate opportunity to create serviced plots. The council therefore needs to consider ways to ensure that the requirement generated by the register reflects local demand and is deliverable.

<b>Issue 4.1 – Meeting demand</b>	
Reasonable Alternatives:	
1. Plan to meet the demand for plots for self-build and custom housebuilding generated by individuals and organisations that have a local connection to the borough (for example people who already live or work in the borough, or have a family connection).	
2. Plan to meet all demand for plots for self-build and custom housebuilding.	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
3 - Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.

improve accessibility to key services and facilities.	
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	It is not expected that either of the alternative options would have a disproportionate impact on equalities groups. There is limited data currently available relating to the specific characteristics of people on the local self-build register or, more generally, interested in self-build and custom-build housing projects. The data that is available suggests that applicants to Lambeth's local self-build register have higher annual incomes than Lambeth's households generally. The median household income of applicants to the register was £45,000. In June 2017 the median household income in Lambeth was £33,280 and the mean household income was £39,986 (Lambeth SHMA 2017). The only demographic data collected through the register relates to age and gender. Analysis of this shows that fewer than 4% of applicants are under 24 and only 23% are over 45. The majority of applicants, 62%, are aged between 25 and 39. 66% of individuals on the register are male; 34% female. The impact of policies on self-build could therefore have a greater impact on males, however this is not considered to be significant.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Both options seek to promote the delivery of plots for self-build housing in the borough and are likely to positively impact on this SA objective. Option 1 is considered more likely to make a positive contribution towards meeting the local demand for self-build and custom-build housing. Given competing demands on land, the number of serviced plots for self and custom-build housing projects that can be delivered is finite. Option 2 is less likely to ensure that the demand for sites generated locally (i.e. by people who already have a connection to the borough) is prioritised/met.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Self and custom-build presents the opportunity for community groups to come together to develop their own homes. Both options therefore have the potential to positively impact on this SA objective.
<b>Environmental</b>	
8 - Built and historic environment. Improve	Like any development, self-build and custom-build housing has the potential to impact positively or negatively on the built and historic



<p>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>environment. However, there are other Local Plan policies which deal with managing impacts on, and improving the quality and character of the built and historic environment. It is not considered that the alternative options would have a significant effect on the achievement of this SA objective.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>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>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>13 - Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>

sustainable use of water resources and to minimise flood risk.	
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Self and custom-build housing, as with all development in Lambeth, will most likely come forward on previously developed land. In this regard both options have the potential to positively impact on this SA objective. However, this type of development tends to be undertaken at lower densities and may not always represent an efficient use of land. Therefore option 2, which seeks to meet all demand for plots, has the potential to have a greater negative impact on this SA objective than option 1, which seeks to meet local demand only. Any impact will also be dependent on how other aspects of the policy are implemented. For example, this could be mitigated if sites for self-build development are assessed as suitable only if they would make efficient use of land.
19 - Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.

rewarding, well located and satisfying employment.	
<p><b>Conclusions</b>                      Both options have the potential to impact positively on the SA objectives relating to housing, liveability and place, and built and historic environment. Although option 2 could potentially result in a higher number of self-build homes (if sufficient land is available), option 1 is considered most likely to deliver the greatest positive outcomes in terms of meeting local demand for housing. As this type of housing development tends to be undertaken at lower densities it may not always represent an efficient use of land. For this reason option 2, which could result in a higher delivery target for self-build and custom-build sites, has the potential to result in a greater negative impact on the SA objective relating to regeneration and the efficient use of land.</p> <p><b>Uncertainties/ Assumptions</b>                      Although Lambeth’s local register indicates a high level of demand for self-build, there is no requirement for applicants to the register to verify their ability to purchase and develop a plot if one is provided. In other words, there is no way to separate aspiration from effective market demand. The level of self-build housing likely to come forward in the future is therefore uncertain.</p> <p><b>Recommendations/ Mitigation</b>                      If option 1 is taken forward, it is recommended that the Local Plan makes clear what is meant by a ‘local connection’, and how this will be determined.</p>	

**Issue 4.2: Density and self and custom-build housing**

Self and custom-build housing projects are likely to involve low density development, which would represent an underuse of land in many parts of Lambeth, in conflict with other planning policies that seek to maximise housing supply.

<b>Issue 4.2 – Density and self and custom-build housing</b>	
Reasonable Alternatives: <ol style="list-style-type: none"> <li>1. Allow the development of sites for self and custom build housing only where this would make efficient use of land.</li> <li>2. Allow lower density development, where this comprises self and custom-build housing, as an exception to usual housing density policies.</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.

<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>It is not expected that either of the alternative options would have a disproportionate impact on equalities groups. There is limited data currently available relating to the specific characteristics of people on the local self-build register or, more generally, interested in self-build and custom-build housing projects. The data that is available suggests that applicants to Lambeth's local self-build register have higher annual incomes than Lambeth's households generally. The median household income of applicants to the self-build register is £45,000. In June 2017 the median household income in Lambeth was £33,280 and the mean household income was £39,986 (Lambeth SHMA 2017). The only demographic data collected through the register relates to age and gender. Analysis of this shows that fewer than 4% of applicants are under 24 and only 23% are over 45. The majority of applicants, 62%, are aged between 25 and 39. 66% of individuals on the register are male; 34% female. The impact of policies on self-build could therefore have a greater impact on males, however this is not considered to be significant.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>Option 1 is considered to have the greatest potential to positively impact on this SA objective. Option 1 supports the provision of self and custom build homes, where such development makes efficient use of land. Requiring development at an appropriate density could potentially result in more homes being delivered on suitable available sites. Option 2 could result in development at lower densities, and therefore fewer homes.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>Self and custom build presents the opportunity for community groups to come together to develop their own homes. Both options therefore have the potential to positively impact on this SA objective.</p>
<p><b>Environmental</b></p>	
<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>Like any development, self-build and custom-build housing has the potential to impact positively or negatively on the built and historic environment. However, there are other Local Plan policies which deal with managing impacts on, and improving the quality and character of the built and historic environment. It is not considered that the alternative options would have a significant effect on the achievement of this SA objective.</p>
<p>9 - Transport and travel. Integrating</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>

<p>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</p>	
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>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>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>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>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>14 - Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling,</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>

remanufacturing and recovery rates.	
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Option 1 is considered most likely to positively impact on the achievement of this SA objective. Option 1 supports the provision of self and custom build homes which makes efficient use of land. This infers both developing at an appropriate density and exploring opportunities to improve land which is underutilised or in disrepair. Option 2 does not directly promote the efficient use of land, and has the potential to negatively impact on this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<p><b>Conclusions</b></p> <p>Both options have the potential to impact positively on the SA objectives relating to housing, liveability and place, and built and historic environment.</p> <p>Option 1 is considered most likely to positively impact on the achievement of the SA objective to make efficient use of land. This infers both developing at an appropriate density and exploring opportunities to improve land which is underutilised or in disrepair. Option 2 does not directly promote the efficient use of land, and has the potential to negatively impact on this SA objective.</p>	

**Uncertainties/ Assumptions**

Although Lambeth's local register indicates a high level of demand for self-build, there is no requirement for applicants to the register to verify their ability to purchase and develop a plot if one is provided. In other words, there is no way to separate aspiration from effective market demand. The level of self-build housing likely to come forward in the future is therefore uncertain.

**Recommendations/ Mitigation**

If option 1 is taken forward the policy will need to make clear what is meant by 'make efficient use of land' and how this will be determined.



## Topic 5: Business and Jobs

### Issue 5.1 Affordable workspace

‘Supportive and affordable workspace facilities’ is a term used for start-up business incubators, accelerators, co-working spaces, artist studios, maker spaces and other workspace facilities that support micro-business, start-ups and high growth potential business.

With the exception of for-profit co-working spaces, these facilities typically provide below-market rent space for businesses, flexible easy-in and easy-out terms as well as forms of on-site business support that support the survival and growth of small businesses.

Some aspects of Local Plan policy need to be updated to take account of recent trends in the London and Lambeth economy, which mean there's more flexibility in the way people work, people are taking up less space at work and there's growing demand from a range of sectors for affordable business space.

The following table assesses three alternative options for managing affordable workspaces (AWS) in Lambeth. Option 1 will provide new affordable workspaces, option 2 will provide new affordable workspaces through a targeted approach on specific sites, option 3 requires developers to work with Affordable Workspace Providers, and option 4 would not implement any new policies to encourage affordable workspaces.

#### Assessment of Alternatives

<b>Issue 5.1 – Affordable Workspace</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Provide affordable workspace at less than market rents to meet the needs of small businesses, particularly in the creative and digital industries, across the borough</li> <li>2. Provide affordable workspace at less than market rents to meet the needs of small businesses, through a targeted approach that focuses on specific types of sites</li> <li>3. Require developers of new business space to work with specialist affordable workspace providers (AWP) chosen by the council</li> <li>4. No change to current policy i.e. no specific requirements for affordable workspace</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Employment can have potential positive effects on people's health (including mental health) and wellbeing (e.g. through improved access to jobs). If the provision of affordable workspace creates job opportunities for local people, options 1, 2 and 3 could generate positive effects (directly or indirectly) on health and wellbeing. Option 2 could target areas where there is an undersupply in job opportunities and so potentially better impact on this objective.

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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Options 1, 2 and 3 could generate new local employment opportunities that could benefit equalities groups and help address worklessness and poverty. Option 2 could target AWS to communities most liable to experience discrimination, poverty and social exclusion and so potentially better impact on this objective.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Options 1, 2 and 3 have the potential to promote interactions between different sectors of the community; and promote wellbeing and help to make people feel positive about the area where they live. Affordable workspace in local communities may help promote long-term social cohesion and contribute to feeling a sense of place to an area. Options 1 and 2 probably provide greater certainty of delivery of affordable workspace than option 3.
<b>Environmental</b>	
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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.

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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	The creation of new affordable workspace (options 1 and 2) could have a positive effect on this objective through providing opportunities for apprenticeships for example. By working with AWP, option 3 can establish channels to promote appropriate skills development. Option 4 will unlikely deliver the positive effects that options 1, 2 and 3 are likely to.
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	Options 1, 2 and 3 all have the potential to result in significant positive effects for the local economy. Options 1 and 2 have the potential to increase the amount of affordable workspace in Lambeth and thus it could attract new enterprises, increase the diversity of businesses in the borough, and help to create a more dynamic economy. By requiring developers of business space to work with specialist affordable workspace providers, option 3 could help to ensure that affordable workspaces meet the specific requirements of small local businesses. In turn AWP can also ensure workspace and letting arrangements are designed appropriately in order to reduce the likelihood of underutilised units. Option 4 will not change current policy and so the scope for creating new affordable workspace in Lambeth will continue to be limited. This option is less likely to create an environment conducive to enabling new businesses to grow.
18 - Regeneration and efficient use of land. To stimulate regeneration that	The development of affordable workspaces through options 1 and 2 could help to stimulate

<p>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>	<p>regeneration that maximises benefits to the most deprived areas and communities by better enabling new small and/or local business to develop. Potentially option 3 could stimulate regeneration that maximises benefits to the most deprived areas and communities. Cumulative positive impacts that result from these businesses can then be passed onto the local community. Options 1, 2 and 3 may result in bringing back into use previously developed land and existing buildings.</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>Options 1, 2 and 3 are likely to positively impact on this SA objective. These options could deliver workspaces that cater to the specific needs of local businesses and thus increase the amount of and access to local employment generating activities.</p>
<p><b>Conclusions</b> Option 1 provides affordable workspace at less than market rents to meet the needs of small businesses across the whole borough whereas option 2 targets these spaces to specific sites. Businesses that make use of these spaces could then potentially benefit local communities by providing them with more local job opportunities. In turn such businesses could diversify the local economy. Option 3 could better enable developers to meet the requirements of small business, potentially resulting in local business growth by improving productivity for example. Option 4 does not propose any specific requirements for affordable workspace and so small/new businesses are not likely to benefit to the same extent as they might via the alternative options.</p> <p><b>Uncertainties/ Assumptions</b> Assume that options 1, 2 and 3 will provide affordable workspaces to new businesses only i.e. newly formed, small businesses in Lambeth. The current wording could be open to interpretation.</p> <p><b>Recommendations/ Mitigation</b></p>	

## Issue 5.2 Affordable workspace vs Affordable Housing

The Local Plan needs to strike the right balance between housing and jobs. In future developments where there are viability issues and the development can't afford to provide both, it may be necessary for Lambeth to choose between delivering affordable housing on site, or workspaces for small businesses. The following table assesses two alternative options for managing these different uses in Lambeth. Option 1 prioritises workspaces, whereas option 2 prioritises affordable housing.

### Assessment of Alternatives

<b>Issue 5.2 - Affordable workspace vs affordable housing</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Prioritise affordable workspace for small businesses over affordable housing if it is not possible to provide both</li> <li>2. Prioritise affordable housing over affordable workspace for small businesses if it is not possible to provide both</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Option 1 may result in community safety benefits as new workspaces could increase on-street activity and daytime surveillance levels. However more crimes tend to occur at night-time and therefore the introduction of housing, in place of workspaces, could help to improve safety in the immediate vicinity by increasing 'eyes on the street' surveillance and increasing night-time activity in the local area.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Employment can have potential positive effects on people's health (including mental health) and wellbeing (e.g. through improved access to jobs). If the provision of affordable workspace creates job opportunities for local people, option 1 could generate positive effects (directly or indirectly) on health and wellbeing. Similarly more affordable housing creates more opportunities for local people to live in Lambeth. High quality, affordable housing is a key determinant of health and so option 2 could generate positive effects (directly or indirectly) on health and wellbeing.
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.	Option 2 could help to deliver more housing in Lambeth and improve residents' access to services, jobs and amenities. By helping to deliver more workspaces, accessibility to jobs is likely to be improved by option 1, thus both options could have a positive impact on this objective.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those	Options 1 and 2 both have the potential to impact positively on this SA objective. In order to promote fairness between different population groups,

most liable to experience discrimination, poverty and social exclusion.	Lambeth could provide more workspaces to increase overall employment opportunities in the borough. Such employment opportunities could help to reduce poverty and social exclusion and so option 1 could have a positive impact on this objective. Option 2 will likely benefit equalities groups through the delivery of additional affordable homes.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Option 2 is likely to provide more affordable homes in Lambeth and therefore better ensure that everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity. This option could therefore potentially have a significant positive effect on this SA objective. Option 1 could negatively impact on this objective if affordable workspace is provided at the expense of new affordable homes.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place.	The provision of new workspaces and housing both have the potential to impact positively on liveability and place. For example they could enhance the mix of uses in the local area and promote interactions between different sectors of the community.
<b>Environmental</b>	
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.	All new development has the potential to impact upon the landscape of Lambeth however the existing Lambeth Local Plan already has policies to manage impacts on, and improve the quality and character of the built and historic environment. Accordingly, neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.

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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	By prioritising affordable workspaces over affordable housing, option 1 could enable more small businesses to move to Lambeth and allow existing small businesses to grow. Both of these potential benefits can help to sustain prosperity and grow dynamic local economies.
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.	Both options have the potential to positively impact on this objective, by either delivering more affordable homes which can provide more opportunities for the most deprived communities to live in their own home, or by creating more affordable workspaces. These could also benefit the most deprived areas and communities by potentially providing them with more job opportunities and more spaces to work in.
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.	Option 1 could help to more directly tackle worklessness by providing more affordable workspaces across the borough and therefore allow further business growth. Conversely option 2 is likely to result in more affordable housing units and less affordable workspace being provided in the borough. While this may have less of a direct positive effect in terms of this objective, new housing can improve access to employment, by enabling more people to better access jobs in the borough and, more widely, jobs in London.
<p><b>Conclusions</b></p> <p>By prioritising the development of new affordable workspaces, small businesses should be better able to set up in Lambeth and moreover, existing small business could have more opportunities to grow. Therefore this option could better enable the development of strong and dynamic local economies and improve the social and environmental performance of businesses. Option 2 prioritises affordable housing and so has the potential to deliver a greater number of affordable homes in the borough which can help Lambeth to meet housing</p>	

need. In turn, lower-socio economic groups could potentially have more opportunities to live in their own home.

Both options can produce positive effects on SA objectives 1, 2, 3, 5, 7 and 18. Option 1 is likely to result in more positive effects than option 2 on the local economy, whilst option 2 is likely to produce more positive effects than option 1 on the boroughs housing levels.

**Uncertainties/ Assumptions**

Assume that option one will help to provide more job opportunities for all of Lambeth's communities including the most deprived ones.

**Recommendations/ Mitigation**

Rather than a borough-wide approach, are there certain areas in the borough that would benefit more from prioritising affordable workspace over affordable housing, and other areas that would benefit more from prioritising affordable housing over affordable workspace?



### 5.3 Developer Contributions

When a site is redeveloped, some developers claim that they cannot provide new small business space to replace the existing space to be lost. The council is considering allowing developers to provide a financial contribution instead, to help provide new small business space elsewhere in the borough.

The following table assesses two alternative options for managing the replacement of small business spaces in Lambeth. Option 1 allows a financial contribution to help provide new small business space elsewhere in the borough, whereas option 2 does not allow such a contribution.

#### Assessment of Alternatives

<b>Issue 5.3 - Developer Contributions</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Allow a financial contribution to help provide new small business space elsewhere in the borough, if developers cannot provide new small business space to replace what space is lost when redeveloping a site</li> <li>2. Do not allow a financial contribution from developers in place of providing replacement small business space (No change to current position)</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Option 1 allows developers to provide a financial contribution, in place of small business space, which can then fund the development of small business space. However the new small business spaces may have to be developed elsewhere in the borough and so may not benefit the local community in the same way as replacing business space on site would. Therefore a loss of local business space could result from option 1 and negatively impact on this objective. However option 1 could allow replacement business space to be delivered in areas where there is an undersupply of business space and thus result in

	more equitable outcomes for Lambeth overall, especially if the existing business space to be lost is underused.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Option 2 could help to create interactions between different sectors of the local economy by re-providing business space lost as part of development.
<b>Environmental</b>	
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.

<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	Option 1 could result in a loss of local business space, if it enables employment sites to be redeveloped without adequate (re)provision for small businesses. However, option 1 also has the potential to generate positive effects for the local economy by enabling replacement business floorspace to be provided elsewhere in the borough, where there may be greater demand and therefore more likelihood of it being occupied once provided. The way in which either policy option is implemented will therefore be important.
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.	Option 2 could improve efficiency in land use by re-using previously developed land to replace small business space lost during redevelopment. Option 1 could potentially positively impact on this objective in the same way if the financial contribution is used for replacement small business space on previously developed land or existing buildings. Option 1 has the potential to stimulate regeneration in other areas of the borough, particularly if there is a greater demand for business floorspace elsewhere in the borough.
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.	Both options have the potential to positively impact on this SA objective. Option 2 may be more likely to ensure that small business space and therefore local job opportunities are reprovided on sites where redevelopment takes place. However, option 1 could promote the delivery of replacement business floorspace where there may be greater demand for it. This would increase the likelihood of spaces being occupied and thereby promote job opportunities.
<p><b>Conclusions</b></p> <p>By allowing a financial contribution if developers cannot provide new small business space to replace what space is lost, option 1 could result in stock levels of local business space potentially decreasing. This could harm the local business growth and result in inequitable outcomes for local communities. However replacement business space funded through option 1 could be located in areas of the borough where there is the greatest demand / need for it or where it could be provided more affordably to occupiers. Consequently option 1 has the potential to more equally benefit all of Lambeth's businesses, particularly if the existing space is not well used.</p> <p>It is considered that option 1 offers more flexibility. In the first instance business space should be replaced in redevelopments, but where this is not deliverable; a financial contribution can be sought to provide new small business space elsewhere in the borough. The council could</p>	

pool contributions to provide new business space where there is demand. The council may also take the opportunity to offer such space as affordable workspace.

**Uncertainties/ Assumptions**

Assume that option 2 will replace the small business space lost through redevelopment on site.

**Recommendations/ Mitigation**

Another option that could be explored is a case-by case basis for allowing a financial contribution i.e. in cases where the existing business space is underutilised and there is already a surplus of small business spaces in the local area.

It is recommended that there is an evidence base / strategy in place to demonstrate what areas of the borough new small business space can be funded by the financial contributions.

## 5.4 Key Industrial Business Areas

KIBAs are Lambeth's 'Locally Significant Industrial Sites' as defined in the London Plan and represent the borough's strategic reservoirs of land for business use. There are currently 28 KIBAs in the borough. Lambeth has reviewed all 28 KIBAs and found that most of them cater to specific business needs. However, some have experienced permitted changes to housing and some sites may have potential for development involving a mix of small business space and housing. Lambeth is considering whether or not to amend the boundary of some of their KIBAs.

The following table assesses two alternative options for managing KIBA boundaries in Lambeth. Option 1 does not propose to amend current KIBA boundaries whereas option 2 does propose boundary amendments to potentially allow for development involving a mix of small business space and housing in some locations.

### Assessment of Alternatives

<b>Issue 5.4 - Key Industrial Business Areas</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Do not amend current KIBA boundaries (No change to current position)</li> <li>2. Amend KIBA boundaries as proposed to allow potential for development involving a mix of small business space and housing in some locations.</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Option 2 could potentially result in community safety benefits as more people living near to industrial locations for example town centres could lead to more natural surveillance levels. In turn the introduction of housing could help to improve safety in the immediate vicinity by increasing night-time activity in the local area. Option 1 is not likely to benefit community safety in the same way.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Option 2 could have a potential negative impact on this SA objective if new housing were to be located in very close proximity to particular types of heavy industrial / 'bad neighbour' uses. Potential harmful impacts on the health and wellbeing of residential occupiers attributed to, for example, air pollution, noise and the use of shared access ways, would need to be mitigated. Generally, locations for new housing needs to be carefully considered in relation to the existing levels of air quality. KIBAs tend to be located in more remote areas of the borough and so it could be less likely that occupants of developments near to these areas could undertake active-travel modes, such as walking and cycling from these locations. Such active travel modes help to reduce causes of ill 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.	Mixed use developments could be facilitated through option 2 and these have the potential to include new local services as part of the wider development scheme and therefore have a positive impact on this SA objective. The council would need to require adequate provision of key services and facilities in mixed-use schemes. Option 1 is unlikely to impact on this objective.

<p>4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands</p>	<p>More development is likely to increase pressure on existing infrastructure across the borough. Thus option 2 could potentially have a negative impact on this objective especially considering that some KIBAs are located in remote locations and so are likely to require new transport services, schools and possibly health care infrastructure to meet future occupiers' needs. Option 2 could potentially impact negatively on waste infrastructure provision, given that Lambeth identifies KIBAs as appropriate sites for waste management activities.</p>
<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Option 2 is likely to result in more small business spaces and homes across the borough which could help to provide more jobs and homes units for all communities including lower socio-economic groups.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>Option 2 is likely to benefit this objective by releasing KIBA land to enable the delivery of homes and more affordable homes as part of mixed use development. Mitigation measures may be necessary to ensure that new residents' ability to quietly enjoy that home is not harmed by particular types of heavy industrial / 'bad neighbour' uses in close proximity. It is noted that not all operations on KIBA land are 'bad neighbour' uses.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>Option 2 has the potential to result in mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place. However there is also a risk that option 2 could potentially result in housing in inappropriate locations (e.g. next to 'bad neighbour' uses). This could harm the liveability of the new development as environmental factors could make these location unpleasant for new residents. It is assumed that the part of KIBAs proposed for release under option 2 would not be subject to adverse effects from the remaining area of KIBA in industrial use.</p>
<p><b>Environmental</b></p>	
<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>All new development has the potential to impact upon the landscape of Lambeth however the existing Lambeth Local Plan already has policies to manage impacts on, and improve the quality and character of the built and historic environment.</p> <p>New development, as proposed by option 2, could potentially improve the quality, attractiveness, character and sustainability of the built environment through high quality design in place of former industrial units for example.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and</p>	<p>Option 2 allows potential for development involving a mix of small business spaces and housing and so it could increase pressure on the existing transport services and increase the need to travel. However the areas that are proposed to potentially be amended all appear to be in locations with</p>

the overall level of road traffic whilst prioritising walking, cycling and public transport	good to high levels of public transport accessibility. Thus option 2 is not likely to have a significant negative impact on this objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Creating mixed use developments on former industrial areas might provide new/additional opportunities for biodiversity to flourish. For example gardens could be created and other forms of green infrastructure could be generated. Therefore option 2 could have a positive impact on this objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	All new development will impact upon the landscape of Lambeth however the existing Lambeth Local Plan already has policies to protect and maintain open spaces and their function. New developments created through option 2 have the potential to introduce new green infrastructure and potentially positively impact on this objective.
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.	New London wide policies regarding carbon emissions can help to ensure that the impacts new developments have on greenhouse gas levels are minimised. By amending the KIBA boundaries industrial uses may reduce in Lambeth and thus energy consumption could be minimised and a reduction in greenhouse gases may occur. Option 2 also has the potential to create high density developments which can aid the delivery of sustainable energy scheme such as combined heat and power and/or district heating.
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.	Option 2 could positively or negatively impact on this objective by impacting on demand on water resources. Any potential negative impacts would need to be mitigated potentially through the design of the development.
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.	The Local Plan identifies KIBAs as appropriate locations for waste facilities. Option 2 has the potential to negatively impact on this SA objective if it resulted in less land being available for waste management uses. However, as the amount of land that is proposed to be de-designated is relatively small, and other policies safeguard existing waste management uses, any negative impact attributed to option 2 is unlikely to be significant.
15 - Air quality. To improve air quality	All new development has the potential to harm air quality and so Lambeth should ensure necessary mitigation measure are in place to ensure there is no negative impact on this objective. Option 1 is not likely to improve air quality in Lambeth as existing industrial uses are unlikely to be impacted on.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.

<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>Option 1 does not amend KIBA boundaries and so existing industrial spaces and any businesses in these areas will continue to be protected. In turn this option will continue to protect industrial land which is typically cheaper than comparative non-KIBA land and so business can grow more easily in these locations. Conversely option 2 proposes to develop small business spaces as part of mixed use development in place of former KIBA land. These spaces could potentially sustain prosperity and business growth in a strong and dynamic local economy.</p>
<p>18 - Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.</p>	<p>By amending the KIBA boundaries, existing vacant or underused sites in KIBAs can be more efficiently used to provide workspaces and housing. Such uses could benefit the most deprived areas and communities and improve efficiency in land use. Option 1 could also positively impact on this objective by requiring development involving a mix of small business space and housing to re-use previously developed land and existing buildings outside of KIBAs.</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>Option 1 will continue to protect KIBAs and so provide more affordable areas for businesses to set up and work. These spaces can enable more jobs to be delivered in Lambeth. Option 2 creates mixed use developments, with new purpose built small business spaces. This could provide improved access to a high number and wide range of more satisfying jobs for the local community. Thus both options could have a positive impact on this objective.</p>
<p><b>Conclusions</b> Option 1 will not amend the KIBA boundaries and so the same amounts of specific industrial/business space will be available for business to use and benefit from. These spaces are more affordable than other areas of the borough and so better enable business to grow.</p> <p>Option 2 proposes to reduce the overall amount of KIBA designated land available by amending the KIBA boundaries to enable new development involving a mix of small business space and housing (although it does include potential to designate some new KIBAs). This is likely to result in a reduction in options for some types of business that can only locate in industrial areas away from housing, which could be damaging to some sectors in the local economy. Conversely, it is likely that more homes and potentially more affordable homes will be created through this option. In turn business space lost through KIBA de-designation could be re-provided as part of the new development and so any loss of industrial/business floorspace could be mitigated through option 2. Provided Option 2 involves underperforming KIBAs and/or KIBAs in local environments conducive to enabling liveable residential areas, it is considered that positive effects can arise from option 2, particularly with regards to SA objectives 1, 3, 5, 6, 7, 8, 17, 18 and 19, but there could be negative effects on SA objectives 17 and 19.</p> <p><b>Uncertainties/ Assumptions</b> Uncertainties around what would happen to any existing KIBA business that may be affected by redevelopment proposed through option 2.</p>	



It is also assumed that the part of KIBAs proposed for release under option 2 would not be subject to adverse effects from the remaining area of KIBA in industrial use.

**Recommendations/ Mitigation**

A full a transport review of these areas should be undertaken to fully assess potential for new development. Recommend that any existing businesses that may be affected by the KIBA boundary changes are offered new spaces in the new developments take place through option 2.

## Topic 6: Town Centres

### Betting Offices and Pay Day Loan Shops

Until March 2015, betting offices and pay day loan shops were classified as A2 uses, however an amendment to the Use Classes Order in 2015 removed these two uses from the A2 use class. Now they are now *sui generis* uses, which means they do not fall within a particular use class. This means that planning permission is required for change of use from another use to a betting shop or pay-day loan shop and so the council has greater control over change of uses to these two uses.

The following table assesses two alternative options for managing numbers of betting shops and pay-day loan shops that can be grouped together in one place. Option 1 proposed to limit these numbers whereas option 2 does not.

#### Assessment of Alternatives

<b>Issue 6.1 - Betting offices and pay day loan shops</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Limit the number of betting shops and pay-day loan shops that can be grouped together in one place</li> <li>2. Do not limit the number of betting shops and pay-day loan shops that can be grouped together in one place</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Betting shops and pay-day loan shops have the potential to result in higher levels of anti-social behaviour and possible crime. It is considered that option 1 will result in positive effects on this SA objective, particularly addressing fear of crime. Conversely, option 2 is likely to have a negative impact on this SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Betting shops and pay-day loan shops can potentially have negative impacts on people's finances by increasing the likelihood of gambling addictions. These can harm mental wellbeing and social health. Option 1, therefore, could help to reduce the likelihood of such eventualities occurring.
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.	The prevalence of key services and facilities, such as leisure, cultural, health and social facilities, could be harmed if an unlimited number of betting shops and pay-day loan shops are allowed to be grouped together in one place such as a town centre. Consequently option 1 could help to protect and enhance the provision of key services and facilities and so improve accessibility to them.

4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Option 1 aims to manage overconcentration of betting shops and pay-day loan shops. While some may consider this has a negative impact on low income groups (such as reduced selection of choice) it may also equally result in positive effects on this group by reducing opportunities to spend money / get into debt. Lending shops have a tendency to be disproportionately located in impoverished communities. It is considered important to protect these vulnerable groups.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Option two could harm this objective as high numbers of betting shops and pay-day loan shops could result in higher levels of anti-social behaviour. This could negatively impact upon local amenity.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Betting shops and pay-day loan shops can negatively impact on the vitality, viability and amenity of town centres, and/or lead to increased perception of crime or fear of crime, including anti-social behaviour. It is considered that option 1 will contribute to making people feel more positive about the area they live, and a sense of pride and place for their local town centre.
<b>Environmental</b>	
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.	The quality, attractiveness, character and sustainability of the built environment could be undermined by over-concentrations of betting shops and pay-day loan shops, which often have visually uninteresting frontages. Consequently option 1 is more likely to positively impact on this objective than option 2.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.

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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	It is considered that option 1 is likely to have a significant positive effect on this SA objective. Managing the location of betting shops and pay day loan shops is likely to help to ensure the vitality and viability of town centres is maintained. This could increase footfall and expenditure and also help to attract new businesses to areas as well as maintaining existing ones. Option 2 would potentially negatively impact on the achievement of this SA objective; if left unmanaged the proliferation of betting shops and pay day loan shops in a particular area can alter the perception of a town centre and lead to other negative impacts such as anti-social behaviour, crime and visually uninteresting frontages, all of which could harm the vitality and viability of the centre.
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.	An over-concentration of betting / pay-day loan shops may not maximise benefits to most deprived areas and communities in Lambeth as they could take up space that could be used to accommodate alternative uses - such as social, leisure and recreational facilities - that could better stimulate regeneration and benefit deprived areas. Option 2 could have a negative impact on this objective by

	harming the potential of regeneration schemes being implemented.
19 - Tackling worklessness. Increase the amount of and access to employment generating activities and	Option 1 has the potential to improve the attractiveness of town centres by enabling a better balance/mix of uses in town centres for example. This could help to attract new businesses into these centres, potentially increasing job numbers, and offering all residents the opportunity for rewarding, well located and satisfying employment.
<p><b>Conclusions</b></p> <p>By limiting the number of betting shops and pay-day loan shops that can be grouped together in one town centre, option 1 could provide more opportunities for other town centre uses - such as retail, and food and drink uses, leisure and social facilities - to develop. Overall, option 1 is likely to result in more positive effects on a number of SA Objectives, particularly on built environment, liveability, crime and safety, and local economy. Option 2 is more likely not to achieve such positive effects.</p> <p>Option 2 could result in an overconcentration of betting shops and pay-day loan shops and potentially harm the vitality and viability of town centres. It could also reduce the attractiveness of places which may become less appealing to existing businesses and/or businesses who may be looking to set up and grow in Lambeth. Consequently option 2 could reduce footfall and harm the viability of other retail uses and business in town centres. Groups that are drawn to betting shops and pay-day loan shops may also be further negatively impacted upon if there is a higher chance that they will develop gambling addictions or severe debt for example, which is likely to have adverse impacts on health and wellbeing and to adversely affect the most socially and economically deprived.</p> <p><b>Uncertainties/ Assumptions</b></p> <p>There are uncertainties over what it meant by 'one place'. In turn it would need to be clear what the limit for betting shop /PDL shops be. It is recognised that further details and definitions of terms will be explored and addressed during policy formulation.</p> <p><b>Recommendations/ Mitigation</b></p> <p>This assessment recommends that if option 1 is progressed, policy clearly defines what is meant by the term 'one place' and how a limit to betting and pay day loan shops would be derived/ascertained. (It is recognised that terms will be defined in policy development.)</p>	

## 6.2 A2 Uses

The existing Lambeth Local Plan 2015 has policy (ED9) to manage the proportion and concentration of ground floor A2 uses in town centres. The impetus for the new Local Plan policy came from concern about the number and concentration of betting shops, pawn brokers and payday loan shops and harm caused to Lambeth's town centres. At the time the policy was drafted, betting shops and pay-day loan shops fell within the A2 use class, but they are now *sui generis* uses. Consequently the remaining A2 uses in Lambeth are now banks, building societies, estate agents and other 'financial and professional services'.

The following table assesses two alternative options for managing the proportion of A2 uses in Lambeth. Option 1 proposes to limit their proportion in town centres whereas option 2 does not.

### Assessment of Alternatives

<b>Issue 6.2 - A2 Uses in Lambeth</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Limit the proportion of banks, building societies, estate agents and other 'financial and professional services' within town centres</li> <li>2. Do not limit the proportion of banks, building societies, estate agents and other 'financial and professional services' within town centres</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	If A2 uses were to occupy otherwise vacant shop premises, option 2 could potentially help to increase more active frontages and so reduce crime and fear of crime by increasing levels of natural surveillance.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	By limiting the proportion of banks, building societies, estate agents and other 'financial and professional services' there may be a greater availability of premises for other key services and facilities to locate within. However, banks, building societies etc may also be viewed by some people as a key service / facility. Therefore both options have potential positive and negative impacts on this SA objective, although these are not considered to be significant.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all	Lambeth's ability to protect, enhance and promote a diverse array of shops in centres that cater to the

communities, particularly those most liable to experience discrimination, poverty and social exclusion.	needs of all communities could be enhanced through option 1. This option is more likely to ensure that no overconcentration of any particular use, such as A2s, occurs in Lambeth's town centres.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	An over-concentration of any specific use in town centres, such as banks, building societies, estate agents and other 'financial and professional services' has the potential to harm the mix of uses in the centre. Environments with a poor mix of uses could harm long-term social cohesion, sustainable lifestyles and a sense of place. Option 1 could therefore positively impact on this SA objective.
<b>Environmental</b>	
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.	The quality, attractiveness, character and sustainability of the built environment could be undermined by over-concentrations of A2 uses. Consequently option 1 could potentially have a positive impact on this objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Maintaining the provision of a good mix of key shops and services within town centres can reduce the need to travel. It is considered that limiting the proportion of A2 uses within town centres (option 1) may help to ensure a good mix of uses is maintained. However, banks, building societies etc also provide a key service; limiting the proportion of such uses may result in local residents having to travel further to access their bank or other services they require. Therefore both options have potential positive and negative impacts on this SA objective, although these are not considered to be significant.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.

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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	Managing the location of A2 uses (option 1) may help to promote and maintain a better mix of shops and services. This could increase footfall and expenditure and help to attract new businesses to areas as well as maintaining existing ones, and thereby improve the overall vitality and viability of town centres. Conversely, an over concentration of A2 uses could potentially harm the vitality and viability of the centre. In this respect option 1 could positively impact on this SA objective. However, banks, building societies etc also provide a key service; limiting the proportion of such uses may result in shop premises remaining vacant, or a lack of such services within a particular area, which has the potential to undermine the vitality and viability of town centres. This could be mitigated if option 2 is taken forward. Therefore both options have potential positive and negative impacts on this SA objective, although these are not considered to be significant.
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.	A vital and viable town centres is essential to the successful regeneration of an area. It is considered that option 1 has the potential to ensure a mix of uses in town centres, which would contribute positively to this objective.
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.	Option 1 has the potential to improve the attractiveness of town centres by enabling a better balance/mix of uses in town centres for example. This could help to attract new businesses into these centres, potentially increasing job numbers, and offering all residents the opportunity for



	rewarding, well located and satisfying employment.
<p><b>Conclusions</b></p> <p>By limiting the proportion of banks, building societies, estate agents and other ‘financial and professional services’ within town centres, option 1 could enable more opportunities for other retail, leisure and social facilities to develop. Option 1 should also enable planners to better balance the mix of uses in town centres which could help to maintain the vitality and viability of town centres, attract new businesses to Lambeth and bring new jobs to the borough. Maintaining the provision of a good mix of key shops and services within town centres can reduce the need to travel. It is considered that limiting the proportion of A2 uses within town centres (option 1) may help to ensure a good mix of uses is maintained. However, banks, building societies etc also provide a key service; limiting the proportion of such uses may result in local residents having to travel further to access their bank or other services they require. Similarly limiting the proportion of such uses may result in shop premises remaining vacant, or a lack of such services within a particular area, which has the potential to undermine the vitality and viability of town centres. This could be mitigated if option 2 is taken forward.</p> <p>Option 2 could result in an overconcentration of A2 uses and so the mix of uses in town centres could potentially be harmed, although the evidence for this would need to be carefully assessed. This could reduce the attractiveness of centres and either encourage existing businesses to relocate, potentially outside of the borough, or spur new businesses to look elsewhere. Furthermore, an imbalanced mix of use has the potential to reduce footfall, and harm the viability of the wider centre, by reducing the overall number of customers who use the centre. It may also increase the need to travel to other centres and/or outside the borough.</p> <p>Therefore both options have potential positive and negative impacts on this SA objective, although these are not considered to be significant.</p> <p><b>Uncertainties/ Assumptions</b></p> <p>It is unclear how the limit of A2 uses would be defined.</p> <p><b>Recommendations/ Mitigation</b></p> <p>If option 1 is progressed, policy would need to clarify how limits are set to control A2 uses.</p>	

### 6.3 Protecting A1 Uses

An amendment to the Town and Country Planning (General Permitted Development) (England) Order in 2015 created new permitted development rights for change of use from any other A class use (A1 shops, A3 restaurants/cafes, A4 drinking establishments and A5 hot food take-aways) to A2. This means that other A class uses can automatically become A2 uses without applying for planning permission, with no requirement for prior approval or prior notification. Therefore local planning authorities no longer have control over this type of change of use, and hence have no control over the creation of most new A2 uses. Uncontrolled change of use from A1 to A2 potentially has implications for Local Plan policies that seek to maintain a minimum proportion of A1 units in some town centres or parts of town centres.

The following table assesses two alternative options for managing permitted development rights for change of use from A1 to A2 in Lambeth. Option 1 proposes to restrict these rights where they would harm the main shopping function of a town centre whereas option 2 does not.

#### Assessment of Alternatives

<b>Issue 6.3 - Protecting A1 uses</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Restrict permitted development rights for change of use from A1 to A2 in locations where this would harm the main shopping function of a town centre (through uncontrolled loss of A1 units)</li> <li>2. Do not restrict permitted development rights for change of use from A1 to A2</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Restricting permitted development rights as proposed by option 1 would help to ensure the provision and accessibility of a diverse array of retail (A1) shops in town centres that will cater to the needs of the wider population. In this way, option 1 is likely to positively impact on this SA objective. If left unmanaged (as per option 2), there could be a decline in the retail offer of centres, which could negatively impact on this SA objective.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.

<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Lambeth's ability to protect, enhance and promote a diverse array of shops in centres that cater to the needs of all communities could be enhanced through option 1. This option is more likely to ensure that no overconcentration of any particular use, such as A2s, occurs in Lambeth's town centres and thus all communities should be better able to benefit from a range of local shops.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>By not restricting permitted development rights, option 2 could result in an over-concentration of A2 uses in town centres. Such an over-concentration has the potential to harm the mix of uses in the centre. Environments with a poor mix of uses may not be able to promote long-term social cohesion, sustainable lifestyles and a sense of place.</p>
<p><b>Environmental</b></p>	
<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>The quality, attractiveness, character and sustainability of the built environment could be undermined by over-concentrations of A2 uses. Consequently, by not restricting permitted development rights, option 2 could harm performance towards this objective.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport</p>	<p>Maintaining the provision of a good mix of key shops and services within town centres can reduce the need to travel. It is considered that managing the change of use from A1 to A2 uses within town centres (option 1) may help to ensure a good mix of uses is maintained, with an associated positive impact on this SA objective.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>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>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>

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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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	By restricting permitted development right, option 1 could maintain a good retail shopping offer in town centres and improve their vitality and viability. Thus option 1 could increase footfall and expenditure and also help to attract new businesses to town centres and maintain existing ones. This option could have a positive impact on this objective. By not restricting A1 to A2 permitted development rights, town centre's vitality and viability could be harmed, reducing the centre's ability to sustain a dynamic local economy. Consequently option 2 may result in negative impacts on local economies.
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.	A vital and viable town centre is essential to the successful regeneration of an area. It is considered that option 1 has the potential to better ensure a good retail offer in town centres, which would contribute positively to this objective.
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.	Option 1 could potentially improve the attractiveness of town centres by enabling Lambeth to better control the mix of use in town centres. A good mix of uses could help to attract new businesses into the borough and maintain existing ones. Such businesses could potentially then provide more jobs and offer residents the opportunity for rewarding, well located and satisfying employment.
<b>Conclusions</b>	
Option 1 could enable Lambeth to better manage the mix of uses in town centres, and protect existing levels of A1 uses. A higher proportion of A1 units, and a balanced mix of	

uses in town centres can improve a centre's viability and vitality helping to maintain the customer base, attract new businesses to the borough and maintain existing ones. A cumulative impact that could result from option 1 is more jobs. A good balanced mix also reduces the need to travel, makes places more interesting, and helps provide people with a sense of place and belonging. It is considered that option 1 could potentially result in positive impacts on SA objectives 3, 5, 7, 8, 9, 17, 18, and 19.

Option 2 could result in an overconcentration of A2 uses if change of use from A1 to A2 is not controlled, although this risk would need to be carefully assessed against evidence. Thus the mix of uses in town centres could be harmed reducing the attractiveness of town centres and either encourage existing businesses to relocate, potentially outside of the borough, or reducing the appeal of centres to potential new businesses. Furthermore, an imbalanced mix of use could potentially reduce footfall which has the ability to reduce the number of customers for existing town centre businesses. Conversely, this option potentially provides more flexibility to the market. Negative impacts on SA objectives 3, 7, 8 and 17 are considered possible under option 2, although there may also be positive impacts on objective 17.

**Uncertainties/ Assumptions**

It is uncertain what the demand is for change use from A1 to A2 uses.

**Recommendations/ Mitigation**

## 6.4 Pubs

Lambeth is now able to control the change of use of pubs to shops and other uses as previous permitted development rights have been scrapped. As such Lambeth are considering adding to their existing Local Plan policy on pubs to require applicants to demonstrate that a pub is no longer needed before this type of change of use is allowed.

The following table assesses two alternative options. Option 1 requires applicants to demonstrate that a pub is no longer needed before a change of use to another A class use is allowed, whereas option 2 does not.

### Assessment of Alternatives

<b>Issue 6.4 - Pubs</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Require applicants to demonstrate that a pub is no longer needed before a change of use to another A class use is allowed (No change to current position)</li> <li>2. Do not require applicants to demonstrate that a pub is no longer needed before change of use to another A class use is allowed</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	If not managed appropriately, uses such as public houses can result in a fear of crime, increased crime or anti-social behaviour, especially at night. The change of use of some pubs to an alternative A class use (facilitated more easily by option 2) could potentially impact positively on this SA objective – however, there are other means of managing public houses that are having an unacceptable impact in terms of crime, fear of crime, or anti-social behaviour.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	The change of use of some pubs to an alternative A class use (facilitated more easily by option 2) could potentially impact positively on this SA objective by reducing the availability of alcohol consumption in a social environment/public house and reduce a cause of ill health. However, it may be argued that drinking in a public house potentially reduces the likelihood of patrons getting progressively more drunk, because it is an offence to sell alcohol to a person who is drunk. Such effects are much harder to control in private homes. Alcohol would still be available for purchase in shops (A1 use) though.
3 - Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve	By requiring applicants to demonstrate that a pub is no longer needed before allowing it to change use, option 1 is likely to better ensure the accessibility of pubs in local areas. Pubs provide an

accessibility to key services and facilities.	important function in facilitating social cohesion for some people.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Many pubs play a valuable role in local community life and are often considered a key community facility. They can provide communities with social hubs and thus can help to reduce social exclusion. Option 1 requires applicants to demonstrate that a pub is no longer needed before a change of use to another A class use is allowed and so it could help to protect pubs that play a valuable role in local community life. Consequently option 1 could have a positive impact on this objective.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Many public houses play an important economic and social role in wider community life by providing a hub for social interaction, and contributing to the identity and character of an area. Thus option 1 could help to ensure that such assets are not lost if they are still valued by the local community. Option 1 could help to better maintain social environments (i.e. pubs) that promotes long-term social cohesion, sustainable lifestyles and a sense of place whereas option 2 could expedite the loss of such environments.
<b>Environmental</b>	
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.	Public houses can be integral to the existing quality, attractiveness, and character of the built environment and many are heritage assets. Therefore option 1 could help to maintain pubs and have a positive impact on this objective. However if a pub is underused or vacant or has become dilapidated overtime, option 2 could potentially expedite the change of use process and improve the quality, attractiveness, character and sustainability of the built environment through new development of high quality design.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.

10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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	Pubs can play important roles in their local economy by helping to provide jobs, attracting visitors to the local areas and increasing local expenditure. The loss of such assets without confirmation that they are not needed (as set out in option 2) is likely to detrimentally impact the local economy and could also reduce the social 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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
19 - Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for	Pubs provide a range of different jobs and could therefore provide more satisfying employment opportunities to more people than equivalent A class uses such as shops. Option 1 could better



rewarding, well located and satisfying employment.	protect pubs and consequently have a positive impact on this objective.
<p><b>Conclusions</b></p> <p>Option 1 is likely to better enable planners to understand the existing role of pubs in the wider context of their local communities. Consequently planners should be able to decide which pubs constitute important local economic, social and cultural assets and potentially protect these assets from change of use through option 1. Positive effects on SA objectives 3, 5, 7, 17 and 19 are expected from option 1. Positive effects may also result in terms of the built and historic environment, however, if a pub is underused or vacant or has become dilapidated overtime, option 2 could potentially expedite the change of use process and improve the quality, attractiveness, character and sustainability of the built environment through new development of high quality design.</p> <p>Option 2 would not require applicants to demonstrate that a pub is no longer needed and therefore it could more easily result in change of use to another A class use. If the existing pub is underused, then the local environment could benefit from a change of use. However option 2 could result in the loss of assets that are valued by local communities. The loss of such assets without confirmation that they are not needed (as set out in option 2) is likely to detrimentally impact the local economy, reduce the social performance of businesses, increase social exclusion, reduce social cohesion and impact negatively on local jobs.</p> <p><b>Uncertainties/ Assumptions</b></p> <p>It is unclear how it will be demonstrated that a pub is no longer <i>needed</i>. This analysis assumes that in order to demonstrate that a pub is no longer needed, the applicant will engage with local community groups to ascertain the importance of the pub to them. It also assumes that by not requiring applicants to demonstrate that a pub is no longer needed, it will be easier for applicants to change use to another A class use.</p> <p><b>Recommendations/ Mitigation</b></p> <p>If option 1 is progressed it is recommended that guidance is provided that states what evidence is required from applicants in order for the council to be satisfied that a pub is no longer needed.</p>	

## 6.5 Nightclubs

In April 2017, the Mayor of London published a draft supplementary planning guidance on Culture and the Night Time Economy, bringing together London Plan policies to support the night time economy and culture. The draft SPG highlights that London has 103 fewer nightclubs and live music venues than it did in 2007, a decline of almost a third. In response, the draft guidance indicates that, in line with the National Planning Policy Framework, planning policies and decisions should guard against the unnecessary loss of valued social, recreational and cultural facilities and services; they should ensure that such facilities are able to develop and modernise and are retained for the benefit of the community (NPPF para. 70). The final SPG has not yet been published, however the emerging document can be considered a material planning consideration. The GLA has confirmed that the SPG is likely to be published towards the end of this year. Through Policy 3.1B, the London Plan seeks to protect facilities and services that meet the needs of particular groups and communities. It states that the loss of these facilities without adequate justification or replacement should be resisted. The draft SPG states that boroughs should ensure that this protection includes meeting the needs of those groups and communities who make use of cultural facilities in the evening and night time.

The following table assesses two alternative options. Option 1 seeks to protect nightclubs where they make a positive contribution to Lambeth's culture and night-time economy and do not adversely affect residents whereas option 2 does not.

### Assessment of Alternatives

<b>Issue 6.5 - Nightclubs</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Protect nightclubs from changing to other types of use, where it can be demonstrated that they make a positive contribution to Lambeth's culture and night-time economy and do not adversely affect residents and other businesses.</li> <li>2. Do not protect nightclubs from change of use to other types of use</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	If not managed appropriately, uses such as nightclubs can result in a fear of crime, increased crime or anti-social behaviour, especially at night. The change of use of some nightclubs to an alternative use (facilitated more easily by option 2) could potentially impact positively on this SA objective – however, there are other means of managing nightclubs that are having an unacceptable impact in terms of crime, fear of crime, or anti-social behaviour. Option 2 may reduce crime and the fear of crime if the closure of a nightclub results in improved amenity and safer streets for local residents.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	The change of use of some nightclubs to an alternative use (facilitated more easily by option 2) could potentially impact positively on this SA objective by reducing the availability of alcohol

	and/or drug consumption and reduce a cause of ill health as well as reduce availability of loud music/bass and its effect on hearing.
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.	By protecting nightclubs from changing to other types of use, where it can be demonstrated that they make a positive contribution to Lambeth's culture and night-time economy and do not adversely affect residents and other businesses, option 1 is likely to better ensure the accessibility of nightclubs (i.e. cultural facilities) in local areas.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Nightclubs can play a valuable role in local community life and are often considered a key community facility. They can provide communities with social hubs and thus can help to reduce social exclusion, particularly for young people. Option 1 requires applicants to demonstrate that a nightclub is no longer needed before a change of use to another A class use is allowed and so it could help to protect nightclubs that play a valuable role in young peoples' lives life. Consequently option 1 could have a positive impact on this objective.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Depending on location, option 2 may improve local amenity for residents and allow them quiet enjoyment of their homes.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Nightclubs can play an important economic and social role in wider community life by providing a hub for social interaction, and contributing to the identity and character of an area. Thus option 1 could help to ensure that such assets are not lost if they make a positive contribution to Lambeth's culture and night-time economy. Option 1 could help to better maintain social environments (i.e. nightclubs) that promotes long-term social cohesion and a sense of place whereas option 2 could expedite the loss of such environments. Option 2 may provide improved sense of place if the closure of a nightclub results in improved amenity for local residents.
<b>Environmental</b>	
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.	If a nightclub is underused or vacant or has become dilapidated overtime, option 2 could potentially expedite the change of use process and improve the quality, attractiveness, character and sustainability of the built environment through new development of high quality design.

9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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	Nightclubs can play important roles in their local economy by helping to provide jobs, attracting visitors to the local areas and increasing local expenditure. Consequently as option 1 protects nightclubs where it can be demonstrated that they make a positive contribution to Lambeth's culture and night-time economy and do not adversely affect residents and other businesses, it could have a positive impact on this objective.
18 - Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to	Neither of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.

<p>improve efficiency in land use through the re-use of previously developed land and existing buildings.</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>Nightclubs provide a range of different jobs and could therefore potentially provide more satisfying employment opportunities to more people than equivalent uses. Option 1 could protect better nightclubs and consequently have a positive impact on this objective.</p>
<p><b>Conclusions</b>                  Option 1 is likely to better enable planners to understand the existing role of nightclubs in the wider context of Lambeth’s culture and night-time economy. Consequently planners should be more informed on which nightclubs have a positive contribution on Lambeth’s culture and night-time economy and that do not adversely affect residents and other businesses. In turn this option could then help to protect these assets from change of use. Option 1 is likely to result in positive effects on SA objectives 5, 17 and 19. Depending on operation of individual nightclubs, either positive or negative impacts might result from option 1 on SA objectives 1 (crime) and 7 (liveability).</p> <p>Option 2 would not protect nightclubs from a change of use and so could result in the loss of assets that are culturally and economically significant. Consequently the provision and variety of local facilities could be harmed as could the local night time economy. However if the existing nightclub is underused and/or does not make a positive contribution to Lambeth’s culture and night-time economy then the local economy could benefit from a change of use.</p> <p><b>Uncertainties/ Assumptions</b>                  It is unclear how it will be demonstrated that a premise provides a positive contribution to the wider Lambeth cultural and night-time economy.</p> <p><b>Recommendations/ Mitigation</b>                  If option 1 is progressed it is recommended that guidance is provided that states what evidence is required from applicants in order for the council to be satisfied that a nightclub is no longer needed.</p>	

## Topic 7: Hotels and Visitor Accommodation

### Alternative forms of Accommodation

The Lambeth Local Plan aims to support developers to provide hotels and other forms of visitor accommodation in appropriate locations while striking the right balance between new hotels and other much-needed uses such as housing and offices and an appropriate mix of uses in each neighbourhood.

The number of homes and rooms available in Lambeth through on-line short-term letting sites like Airbnb has rapidly increased in recent years. Some student halls are also available to tourists during holiday periods. These types of accommodation can offer an alternative to hotels. The following table assesses three alternative options for managing hotel growth in Lambeth. Option 3 does not support any new hotels in the Waterloo Area. There are already nine hotels existing in Waterloo and there are two more permissions in the development pipeline.

### Assessment of Alternatives

<b>Issue 7.1 - Hotels and short-term lets</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Accept that short-term lets, like Airbnb and student housing in vacations, help to meet demand for visitor accommodation in Lambeth alongside hotels - and therefore limit the number of new hotel bedspaces that will be supported.</li> <li>2. Continue to support new hotel developments in appropriate locations across the borough (No change to current policy)</li> <li>3. Do not support any new hotels in the Waterloo area</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Supporting new hotels in appropriate locations could potentially result in community safety benefits as more people in these areas could lead to more activity on the street and increased amounts of natural surveillance. Thus option 2 could positively impact this objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	As outlined by option 2 hotels are currently supported in appropriate locations including areas with good access to public transport facilities. Developing alternative uses in these areas such as residential developments could improve accessibility to key services and facilities for Lambeth residents. Options 1, and 3 in particular, could encourage the delivery of housing in these locations and potentially have a positive impact on this objective. To improve the performance of option 2 against this objective, a proportion of wheelchair accessible rooms should be

	secured within all new hotel developments, as set out in current Local Plan and London Plan policy.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	It is considered difficult to assess impact on this as all forms of development place pressure on infrastructure. If development does not proceed as a hotel, then sites would be developed as something else, so demands on most infrastructure are equivalent, with the exception of school places and GP surgeries. The effect of visitor numbers on other infrastructure is therefore considered <i>de minimus</i> when compared with other landuses.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Option 2 could provide job opportunities and, in major schemes, deliver employment and training opportunities. Options 1 and 3 could potentially result in the development of sites for alternative uses, including housing, which is more likely to benefit equalities groups.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Continuing to support widespread hotel development could restrict areas with potential to develop housing. In addition, an over-concentration of hotels close to where people live can harm the amenity for residents, for example through the creation of noise, traffic and disturbance, potentially 24 hours a day. Options 1 and 3 could better enable planners to strategically manage areas and increase the likelihood of new homes being delivered.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place.	Waterloo already accommodates nine hotels and so option 3 has the potential to enable a better mix of uses in the Waterloo area, and possibly aid the delivery of better social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place. Similarly, option 1 could help to create a sense of place by limiting number of new hotels and, for example, better enabling more active frontages and cultural facilities to develop. Conversely option 2 could lead to an oversaturation of hotels in certain locations and therefore harm an area's mix of uses and its sense of place. However existing policy, ED12, states that new visitor accommodation must not unacceptably harm the balance and mix of uses in the area. If carried through into Local Plan Review this should mitigate/prevent this potential impact from occurring.
<b>Environmental</b>	
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.	The existing Lambeth Local Plan already has policies to manage impacts on, and improve the quality and character of the built and historic environment. By abiding by these policies, development could enhance the attractiveness of the built environment.

<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport</p>	<p>Option 2 supports hotel development in ‘appropriate locations’. It is assumed this directly refers to, or at least includes, the CAZ, London Plan opportunity areas, major town centres and other town centres with good public transport links. In this way option 2 integrates planning and transport decisions and promotes sustainable travel. Options 1 and 3 are not envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>New developments have the potential to increase the quantum of green infrastructure on-site which can enhance opportunities for biodiversity to flourish. Thus option 2 could potentially have a positive impact on this objective. At the very least, the current local plan encourages development proposals to protect, enhance, create or manage nature conservation and biodiversity wherever possible. Therefore new development should not significantly detrimentally impact upon current biodiversity levels. Options 1 and 3 are not envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure</p>	<p>Further hotel development could bring new temporary populations that could increase the pressure on green infrastructure across the borough. In order to offset these potential impacts mitigation measures, that ensure improvements to green infrastructure networks, should be required.</p>
<p>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>	<p>There is unlikely to be a significant difference between hotels or alternative land uses with regard to energy consumption and efficiency. As such, there is no fundamental difference between the potential impacts of these alternative options on this objective.</p>
<p>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>	<p>There is unlikely to be a significant difference between hotels or alternative land uses on water resources. Consequently there is no fundamental difference between the alternative options with regard to impacts on this SA objective.</p>
<p>14 - Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.</p>	<p>There is unlikely to be a significant difference between hotels or alternative land uses on waste issues. As such there is no fundamental difference between the possible impacts of the alternative options on this objective.</p>
<p>15 - Air quality. To improve air quality</p>	<p>Option 2 supports new hotel development and so this could result in more people travelling within Lambeth and possibly reduce overall air quality. More generally however, increased amounts of development could</p>



	help to provide the critical mass necessary to implement cleaner energy solution such as combined heat and power or district heating. Such solutions are often appropriate for hotel developments due to the nature of their activity. Accordingly option 2 may result in improved air quality.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	In the current Local Plan, there is policy to ensure that major developments include training opportunities such as apprenticeship schemes. Option 2 could help facilitate the delivery of more major schemes and thus more training schemes.
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	Increases in visitor accommodation development can create a positive economic spiral by increasing the customer base of local businesses and enabling business growth. In turn new hotels could improve the quality of the built environment and attract new businesses resulting in further inward investment. Hotels also generate jobs and therefore employment opportunities for local people. However, other types of development, such as commercial developments, in such locations could better benefit the economy if they were to create a higher number of jobs for example.
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.	Option 2 could increase the potential for regeneration by improving the quality of the built environment and attracting inward investment. Options 1 and 3 could allow for other types of uses that are more associated with regeneration projects to come forward, such as new homes and so each of the options could positively impact on this objective.
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.	Option 2 has the potential to have a significant positive impact on this objective, by providing job opportunities (within the new hotels) for local people in accessible locations. If the sites were instead developed for alternative commercial or business uses options 1 and 3 similarly have the potential to increase access to employment generating activities and positively impact on this objective.
<p><b>Conclusions</b></p> <p>Option 1 could better enable the council to strategically manage the mix of land uses across the borough by limiting the number of new hotels. This option still allows for a limited number of new hotel developments. Conversely option 3 is a more restrictive approach that would preclude new hotels from locating in Waterloo. Residential, office, retail and other commercial uses are likely to have more development opportunities through options 1 and 3.</p> <p>Option 2 does not change current policy and so hotels would be supported in certain areas across the borough such as those with good public transport accessibility. By supporting new hotel development, visitor numbers are likely to increase and the wider economy could benefit. However alternative land uses could potentially benefit the economy more directly</p>	

and help Lambeth to meet its housing and affordable housing need for example. A more restrictive approach could better ensure a balance of land uses in areas nearby to key public transport nodes, including Waterloo, and across the borough more widely. Although it is noted that existing local plan policy ED12 states that new visitor accommodation must not unacceptably harm the balance and mix of uses in the area, which helps avoid oversaturation of hotels in certain locations.

**Uncertainties/ Assumptions**

It is assumed that option 1 will allow for limited amounts of hotel developments across the borough in certain areas as outlined in current policy.

**Recommendations/ Mitigation**

Option 1 should outline whether or not hotels will be limited across the borough or in certain locations or once certain thresholds are met.

## 7.2 Serviced Apartments

Lambeth is experiencing an increase in planning applications for ‘serviced apartments’. These are like very small studio flats with their own kitchen and bathroom and there are concerns they will be used as permanent housing rather than by visitors. Lambeth is considering the need for a separate policy to manage this type of application.

The following table assesses two alternative options for managing the delivery of serviced apartments in Lambeth. Option 1 proposes to manage their delivery whereas option 2 does not.

### Assessment of Alternatives

<b>Issue 7.2 - Serviced Apartments</b>	
Reasonable alternatives: 1. Manage the delivery of ‘serviced apartments’ across Lambeth through new Local Plan policy 2. Do not manage the delivery of ‘serviced apartments’ across Lambeth - continue to treat on a case by case basis (No change to current position)	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	If option 2 is taken forward, to mitigate any potential harm to health and wellbeing, the council would need to ensure the serviced apartments were not going to be occupied as permanent residential accommodation
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	If option 2 is taken forward, to mitigate any potential harm to health and wellbeing, the council would need to ensure the serviced apartments were not going to be occupied as permanent residential accommodation.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	A possible outcome of option 2 is the creation of high numbers of serviced apartments. This could compromise the Lambeth’s ability to deliver conventional housing. Option 1 could enable the council to better strategically manage the location and quantity of serviced apartments. There may be concerns with option 2 over the ability to control the long-term use of this type of accommodation, with

	a risk that it becomes a form of de facto permanent residential use without the benefits of normal design standards and affordable housing contributions.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Option 1 manages the delivery of serviced apartments and so could better enable Lambeth to deliver mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place. Option 2 might have potential to harm the mix of uses and have wider cumulative impacts on the liveability and sustainability of local neighbourhoods. There may be concerns over the ability to control the long-term use of this type of accommodation, with a risk that it becomes a form of de facto permanent residential use without the benefits of normal design standards and affordable housing contributions.
<b>Environmental</b>	
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.	All new development could impact on Lambeth's built environment however the existing Lambeth Local Plan already has policies to manage impacts on, and improve the quality and character of the built and historic environment.  By abiding by these policies, new development could enhance the attractiveness of the built environment. It is not possible to assess the relative merits of the alternative options against this objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Option 1 could enable the council to better strategically manage the location and quantity of serviced apartments developed and better integrate planning and transport decisions.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	New development is likely to increase demand on existing infrastructure and thus it is likely that this demand could be better managed through option 1.
12 - Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.

Borough for the unavoidable effects of climate change.	
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	Option 2 could potentially result in a higher number of serviced apartments in Lambeth and consequently could increase the overall number of visitors to the borough, which could positively impact on this objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	There are likely to be a small number of employment opportunities generated by developments comprising new serviced apartments e.g. housekeeping, maintenance, concierge service etc. thus option 1 could have a positive impact on this objective.
<p><b>Conclusions</b></p> <p>By managing the delivery of serviced apartments, Lambeth is likely to have more strategic control over the delivery of these units. Option 2 does not manage their delivery and so higher numbers of these apartments could be created. Option 2 might have potential to harm the mix of uses and have wider cumulative impacts on the liveability and sustainability of local neighbourhoods. There may be concerns over the ability to control the long-term use of this type of accommodation, with a risk that it becomes a form of de facto permanent residential use without the benefits of normal design standards and affordable housing contributions.</p> <p><b>Uncertainties/ Assumptions</b></p> <p>There are uncertainties around how serviced apartments will be used, for example they could be used for permanent housing rather than as a form of visitor accommodation.</p>	

**Recommendations/ Mitigation**

If option 2 is taken forward, to mitigate any potential harm to health and wellbeing and opportunities lost for provision of affordable housing, the council would need to ensure the serviced apartments were not going to be occupied as permanent residential accommodation.

### 7.3 Employment, Training and Career Opportunities

The current Lambeth Local Plan outlines that in major developments, planning obligations will be used as necessary to ensure that job opportunities and apprenticeships are notified to the council or appropriate nominated agencies so that suitable local people can be given the opportunity to fill these vacancies. Lambeth is considering requiring new large hotels to provide high quality employment, training and career opportunities for Lambeth residents.

The following table assesses two alternative options for managing employment, training and career opportunities associated with major hotel developments in Lambeth.

#### Assessment of Alternatives

<b>Issue 7.3 - Employment, Training and Career Opportunities</b>	
Reasonable alternatives: 1. Require large new hotels to provide high quality employment, training and career opportunities for Lambeth residents. 2. Make no distinction in the employment and skills requirements for large new hotels vs other types of major development (No change to current position)	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Lower socio-economic groups may require employment, training and career opportunities and thus option 1 could better ensure that such groups benefit from such opportunities. It is considered that option 1 provides more certainty of employment, training and career opportunities than option 2, thus option 1 is more likely to benefit equality groups.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.

7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Environmental</b>	
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
15 - Air quality. To improve air quality	Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	When compared to option 2, option 1 is likely to better ensure that more high quality employment, training and career opportunities for Lambeth residents proliferate across the borough. Therefore option 1 is more likely to aid performance towards this objective.



	<p>It is not clear whether both options 1 and 2 might apply at the same time. Other issues and alternatives being considered as part of the Local Plan Review include limiting the new hotel development. Should that policy approach be progressed; there will be effects on option 1 offered here regarding employment, skills and training. Option 1 might provide less certainty for the achievement of SA objective 16. If only hotel development need provide employment and training opportunities, then a lot of other types of training opportunities for Lambeth residents might be missed. Requiring hotels to provide this training results in positive effects on SA Objective 16, particularly as there are wide range of jobs available in the hotel industry; many skills of which are transferable. However, to maximise effects on SA Objective 16, it is considered that both options could be progressed.</p>
<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>Option 1 can improve the social performance of business by aiding hotel owners to deliver against corporate social responsibility targets for example, and supporting opportunities for more deprived population groups. Option 2 can help other industries also meet these targets.</p>
<p>18 - Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.</p>	<p>Neither of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</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>Requiring large new hotels to provide high quality employment, training and career opportunities could enable more Lambeth residents to access more employment opportunities, particularly in the hospitality sector. Both options will aid Lambeth's commitment to reduce unemployment in the borough.</p>
<p><b>Conclusions</b> By requiring large new hotels to provide high quality employment, training and career opportunities for Lambeth residents, the education and skill levels of the population could be enhanced by option 1. In turn this option could better enable lower-socio economic groups to gain rewarding, well located and satisfying jobs, and possibly improve the social performance of hotel businesses.</p> <p><b>Uncertainties/ Assumptions</b> It is not clear whether both options 1 and 2 might apply at the same time. Other issues and alternatives being considered as part of the Local Plan Review include limiting the new hotel development. Should that policy approach be progressed; there will be effects on option 1</p>	

offered here regarding employment, skills and training. To maximise effects on SA Objective 16, it is considered that both options could be progressed.

**Recommendations/ Mitigation**

To maximise effects on SA Objective 16, it is considered that both options should be progressed.

## Topic 8: Improving Air Quality

### Issue 8.1 Air Quality Assessments

When assessing planning applications, Lambeth currently uses the Mayor's London Plan policy which requires developments to be air quality neutral, minimise increased exposure to existing air quality and address local problems. This applies especially in Air Quality Management Areas and where developments are used by the most vulnerable people. The new Local Plan policy on air quality will set out the types of planning application that require an Air Quality Assessment and what this should include. An Air Quality Assessment is an assessment of the impact of a development on the levels of certain pollutants in the local area.

The following table assesses four alternative options for types of developments that should require AQAs in Lambeth. Option 1 and 2 require AQA if the development itself will reduce local air quality whereas option 3 requires AQA if they are to be occupied by people most vulnerable to air pollution, and option 4 requires AQA for developments that take place in areas with existing poor air quality.

#### Assessment of Alternatives

<b>Issue 8.1 - In which developments should Air Quality Assessments (AQAs) be required?</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Developments that, post-construction, result in a reduction in air quality in the area</li> <li>2. Developments that reduce air quality during construction</li> <li>3. Developments occupied by people who are more sensitive to air pollution</li> <li>4. Developments that take place in areas with poor air quality</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	None of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Air quality is a major environmental risk to health. All four options have the potential to positively impact on this SA objective as they would all enable negative air quality impacts associated with development proposals to be identified and appropriate measures applied to reduce the exposure of people in the borough to poor air quality. This is likely to have a positive effect on improving air quality in the borough and subsequently improving health and quality of life. Options 1, 3 and 4 are likely to have greater longer-term benefits to health and well-being. However, reducing emissions from construction is one of Lambeth's main air quality priorities. Option 2 will benefit this SA objective by ensuring that emissions from construction activities, such as dust and emissions from machinery, are identified and minimised. Requiring an AQA in all of the circumstances set out in Options 1 to 4 would have the greatest cumulative positive impact on this objective.

<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>None of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Poor air quality disproportionately affects very young people, older people, people with respiratory or circulatory conditions, and people on lower incomes who are more likely to live on congested busy roads where rents are cheaper. All of the proposed options could therefore positively impact on this SA objective. Option 1 could help to ensure that local air quality is not harmed in the long term by requiring AQAs for developments that, post-construction, result in a reduction in air quality in the area, and so help to ensure equitable outcomes for all communities. To better ensure that local air quality is not significantly reduced in the short term, option 2 should be encouraged to reduce the chances of any inequitable outcomes. Option 3 could help to ensure that those who are most sensitive to air pollution, such as children, older people and those in ill-health, are not inequitably impacted upon and so benefit this objective. Option 4 could better ensure that occupants in areas with poor air quality are not unfairly impacted upon by existing air quality problems and so positively impact on this objective. Together, all four options cumulatively would result to greater positive effects on SA Objective 5.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>All options could better enable all local residents to quietly enjoy their home by better protecting local amenity (i.e. improving air quality) and so positively impact on this objective.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place.</p>	<p>AQAs associated with all options could encourage enhancing on-site levels of vegetation to improve the local environment. This measure can enhance local liveability, improve the quality of the public realm and help to promote long term social cohesion, sustainable lifestyles and a sense of place. Option 2 requires AQAs of developments that reduce air quality during construction. Therefore it could help to ensure that developments do not harm the liveability of the</p>

	<p>surrounding environment or the quality of the surrounding public realm.</p> <p>Option 3 could result in environments that promote long term social cohesion and sustainable lifestyles by better protecting occupants from any harmful impacts of air pollution. Option 4 could help to facilitate sustainable lifestyles in areas with poor air quality.</p>
<b>Environmental</b>	
<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>Air pollution can have deleterious impacts on the quality of the built environment through dust deposition and acid erosion (caused by sulphur dioxide emissions). Air pollution levels can increase during construction (through construction processes and delivery of materials) and post construction (energy use and increased trips undertaken by new residents etc.). Individually, all of the options will help to protect the built and historic environment from these potential harmful impacts by encouraging mitigation measures; but all the options applied together will cumulatively result in improved air quality.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport</p>	<p>Recommendations from AQAs can influence transport decisions where air quality impacts are identified (e.g. traffic reduction and/or low emission strategies). Consequently all of the options could positively impact on this SA objective.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>Reductions in air quality can harm local biodiversity. In light of this, air quality assessments should be required on any scheme that could decrease air quality. All options could help to reduce any harmful impacts that developments have on air quality and, in turn, biodiversity. Consequently they can all positively impact on this objective. AQAs can require enhanced levels of vegetation on site and thus help to develop more potential habitats and enhance biodiversity levels.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>Mitigation measures that could result from AQAs described in all of the options include creating new green infrastructure. Thus all options can directly benefit this objective.</p> <p>Reductions in air quality can harm green infrastructure. Consequently air quality assessments should be required on any scheme that could decrease air quality. All options could help to reduce any harmful impacts that developments have on air quality and, in turn, green infrastructure. The presence of green infrastructure helps improve local air quality.</p>
<p>12 - Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce</p>	<p>During the construction processes, harmful particulates such as dust and nitrogen oxide can be emitted and so option 2 could help to reduce this risk that such particulates pose by requiring mitigation measures.</p>

greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	Options 1, 3 and 4 could potentially help to reduce greenhouse gas emissions by requiring new energy systems/building materials for example that could minimise energy consumption and increasing energy efficiency over the life of the development. Other mitigation measures that could be promoted through these options' AQAs include new green infrastructure provision; this has the potential to reduce prevalence of greenhouse gases and so positively impact on this objective.
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.	To best ensure high water quality within the borough, air pollution should be minimised. All options could help to reduce any harmful impacts that developments have on air quality and, in turn, water quality.
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.	AQAs have the ability to require implementing mitigation actions that reduce production of waste products, and increase re-use, recycling, remanufacturing and recovery rates. Therefore all of the options could potentially help to improve performance against this objective.
15 - Air quality. To improve air quality	All four options are likely to have a significant positive impact on this SA objective. To best ensure improved air quality in all areas of the borough, air pollution should be minimised from all developments. All options individually help to reduce any harmful impacts that developments may have on air quality, but applied together, all options cumulatively are likely to have a much more positive effect on improving air quality.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	None of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.
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	Improvements in air quality during and post construction can result from more efficient use of materials and resources. All of the options could help improve the social and environmental performance of businesses also by facilitating improvements in local air quality. Similarly, improved air quality benefits the economy by creating environments people want to live, work and visit; ultimately benefiting the local economy.
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.	None of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.

<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>None of the alternative options are envisaged to have a significant effect on the achievement of this SA objective.</p>
<p><b>Conclusions</b>                  All of the options result in more AQAs and thus could help to reduce the impacts that developments have on air quality by requiring significant mitigation measures. There are several cumulative, direct and indirect impacts that are likely to benefit the borough as a result of implementing these options, for example increasing green infrastructure, reducing waste production and greenhouse gas emissions and long term financial savings, improved health and wellbeing, improved productivity and benefits to the local economy. All four options are likely to have a significant positive impact on the air quality SA objective. To best ensure improved air quality in all areas of the borough, air pollution should be minimised from all developments. All options individually help to reduce any harmful impacts that developments may have on air quality, but applied together, all options cumulatively are likely to have a much more positive effect on improving air quality. Negative impacts on air quality are likely to result if only 1 option is progressed. For example, if option 1 is progressed, negative impact on air quality are more likely to result from construction, and developments occupied by those more sensitive to air pollution (for example nurseries, hospitals, schools, older persons housing) will unlikely be scrutinised for air quality impacts. Accordingly, it is recommended that all four options are progressed.</p> <p><b>Uncertainties/ Assumptions</b>                  This assessment assumes that AQAs will be comprehensive and provide a list of necessary mitigation actions that require implementation to ensure that any potential harmful air quality impacts that result from developments are minimised / mitigated. For example it is assumed that AQAs could require developments to provide new vegetation on site, mitigating air pollution and reduce levels of particulates such as dust and other waste products, where required. Other potential results of AQAs include implementing clean energy solutions and minimising long term energy consumption.</p> <p><b>Recommendations/ Mitigation</b>                  It is recommended that all four options are progressed.</p>	

## 8.2 Mitigation

The new Local Plan policy needs to address air pollution caused by the construction and operation of residential and commercial buildings in the borough and set out how developers should mitigate the negative impacts of their development on air quality. This policy will work alongside other policies that contribute to improving air quality, such as on transport, green infrastructure and waste.

The following table assesses three alternative options for the types of mitigation that will be required for new developments in Lambeth. Options 1 and 2 mitigate potential impacts of the development on the surrounding area, whereas option 3 mitigates existing poor air quality impacts on future occupiers of the development.

### Assessment of Alternatives

<b>Issue 8.2 - What types of mitigation should be required?</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Mitigate impacts of construction</li> <li>2. Mitigate impacts of the development on the area</li> <li>3. Mitigate impacts of the existing poor air quality in the area on those who will occupy the development</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Air quality is a major environmental risk to health. All three options have the potential to positively impact on this SA objective as they would help mitigate negative air quality impacts associated with development proposals. This is likely to have a positive effect on health and quality of life. Reducing emissions from construction is one of Lambeth's main air quality priorities. Option 1 will benefit this SA objective by ensuring that emissions from construction activities, such as dust and emissions from machinery, are mitigated and minimised. Options 2 and 3 are likely to have greater longer-term benefits to health and well-being such as minimising emissions from new developments although all three options could result in new green spaces, increasing the likelihood of residents undertaking exercise and also improve their mental well-being. Requiring mitigation measures in all of the circumstances set out in options 1 to 3 would have the greatest positive impact on this objective.
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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
4 - Provision of essential infrastructure. To ensure	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.



<p>that the necessary infrastructure is planned or in place to meet current or likely future demands</p>	
<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>Poor air quality disproportionately affects very young people, older people, people with respiratory or circulatory conditions, and people on lower incomes who are more likely to live on congested busy roads where rents are cheaper. All three of the alternative options could therefore positively impact on this SA objective. Option 2 is likely to mitigate the long term impacts of development and so help to ensure that environmental conditions in Lambeth's most deprived areas for example are not detrimentally impacted on. However option 1 does not account for any potential long term negative impacts and likewise option 2 does not account for harmful impacts of construction. Therefore if either option is not pursued deleterious impacts on the local environment could materialise and lead to inequitable outcomes for local communities.</p> <p>Option 3 could help to reduce the harmful impacts of existing poor air quality on future occupiers however it may not benefit existing communities unless new green infrastructure is provided and opened up for public use for example. Requiring mitigation measures in all of the circumstances set out in options 1 to 3 would have the greatest positive impact on this objective.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>All options could better enable all local residents to quietly enjoy their home for example by reducing noise and air pollution. Option 2 for example can help to reduce the noise impacts that external boilers have and thus help to protect local amenity.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>All of the options could result in the creation of new vegetation/greenery which can enhance local liveability, improve the quality of the public realm and help to promote long term social cohesion, sustainable lifestyles and a sense of place.</p> <p>Option 1 for example could encourage the development of new vegetation to protect the liveability of surrounding environments by creating physical barriers around dust/emission generating activities and so reduce / prevent pollutants and particulates from spreading beyond the site boundary. The options can also help to improve local air quality and noise pollution and so enhance the quality of the public realm.</p>
<p><b>Environmental</b></p>	
<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</p>	<p>Air pollution can harm the quality of the built environment through dust deposition and acid erosion (caused by sulphur dioxide emissions). Air pollution levels can increase during construction (through construction processes and delivery of materials) and post construction (increased amounts of local trips). Individually, all three options could positively impact this objective but all of the options applied together will cumulatively</p>

space, valued views and historic assets.	result in the built environment being better protected from potential impacts of air pollution.
9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport	Mitigation measures include influencing transport decisions where air quality impacts are identified, for example by reducing traffic levels and/or implementing low emission strategies. Consequently all of the options could positively impact on this SA objective.
10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people	Harmful impacts associated with new developments, such as air pollution, have the potential to negatively impact on biodiversity. In light of this, mitigation measures should ensure that biodiversity levels are not harmed. Options 1 and 2 could have a positive impact on this objective by mitigating levels of pollution emitted from development and reducing any potential harmful impacts on biodiversity. Option 3 may be less likely to benefit biodiversity in the same way (if only mitigation measures such as installing triple glazing are implemented) however akin to options 1 and 2, by requiring vegetation on site, option 3 could enhance biodiversity in Lambeth and bring people closer to nature.
11 - Green infrastructure. To create, manage and enhance green infrastructure.	Harmful air pollution impacts associated with all new developments can potentially harm existing green infrastructure. For example, dust can have both physical and chemical effect on vegetation. Option 1 could help to ensure that these potential harmful impacts are minimised. In order to enhance green infrastructure levels, Lambeth could require green infrastructure to be created as part of the mitigation process accompanying all new developments. All of the options could then have a direct positive impact on this objective.
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.	During construction harmful particulates such as nitrogen oxide, can be emitted and so option 1 could help to reduce greenhouse gas levels. Option 2 could potentially address the long term impacts of development and also help to reduce greenhouse gas levels by requiring new vegetation. Such greenery can help to reduce levels of greenhouse gases. Option 3 could similarly aid performance against this objective and mitigation measures such as triple-glazed windows can improve insulation and thus minimise occupants' energy consumption.
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.	High levels of dust can lead to chemical changes to watercourses. Therefore to best ensure the quality of water within the borough, harmful impacts of development such as particulate generation and nitrogen pollution should be minimised. Option 1 could help in this way. Options 2 and 3 could result in the development of new green infrastructure, for example, which can then increase the prevalence of water-permeable surfaces across the borough and minimise flood risk. Consequently all of the options have the potential to benefit this objective.

<p>14 - Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.</p>	<p>Waste can be developed during construction and occupation of new developments. Option 1 can help to minimise the production of waste by preventing the build-up of dust material for example. Option 2 could result in the production of waste/recycling plans which can help to minimise waste production and thus positively impact on this objective. Option 3 mitigates impacts of existing poor air quality on those who will occupy the development and so may not benefit this objective to the same extent as the other options.</p>
<p>15 - Air quality. To improve air quality</p>	<p>To improve air quality in all areas of the borough, levels of air pollution should be minimised from all developments. All of the options are likely to have a significant positive impact on this objective. Option 1 can better ensure that deliveries to sites are undertaken when local traffic levels are low, reducing the risk of congestion for example. In turn it could help prevent particulates created during construction from affecting surrounding areas by requiring green walls around the site. All three options could result in the creation of new vegetation which can then help to improve local air quality. However if option 3 only protects new occupants from existing poor air quality it is less likely to have a positive impact on the wider community. All three options applied together would have positive cumulative effects on improving air quality in the borough.</p>
<p><b>Economic</b></p>	
<p>16 - Education and skills. To maximise the education and skills levels of the population.</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<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>Mitigation of negative development impacts, such as air and noise pollution, can potentially result in more energy efficient developments that utilise materials and resources more efficiently. Therefore, in the long term, options 2 and 3 could result in developments that help occupiers reduce costs and potentially improve the environmental performance of businesses.</p>
<p>18 - Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings.</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>19 - Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>

<p>opportunity for rewarding, well located and satisfying employment.</p>	
<p><b>Conclusions</b></p> <p>Generally the council should attempt to ensure that all potential harmful impacts of new developments are mitigated as fully as possible. Mitigation can lead to both short and long term benefits for existing local communities and future occupiers of the development. To improve air quality in all areas of the borough, levels of air pollution should be minimised from all developments. All of the options are likely to have a positive impact on air quality. Option 1 can better ensure that deliveries of construction material to and from sites are undertaken when local traffic levels are low, reducing the risk of congestion for example. In turn it could help prevent particulates created during construction from affecting surrounding areas by requiring green walls around the site. Option 1 is likely to reduce negative impacts of development in the short term, by reducing the impacts of dust and other particulates on surrounding communities and the local environment. All three options could result in the creation of new vegetation which can then help to improve local air quality. However if option 3 only protects new occupants from existing poor air quality it is less likely to have a positive impact on the wider community.</p> <p>Option 2 could potentially have similar positive impacts over a longer time period. Depending on the type of mitigation measures required, option 3 could directly benefit future occupants of the development rather than existing local communities. All three options have the potential to result in the creation of new green infrastructure. This can help to protect local air quality and provide space that increase the liveability of the local area. All three options applied together would have positive cumulative effects on improving air quality in the borough.</p> <p><b>Uncertainties/ Assumptions</b></p> <p>This assessment assumes that all new development has the potential to harm air quality and produce waste during and post construction. It also assumes that option 1 will help to reduce the potential for harmful particulates, such as nitrogen oxide and fine dust, to impact on the local area. Assume that option 2 could mitigate the longer term impacts of the development on the surrounding area by implementing new green infrastructure, reducing impacts that external boilers may have and generally creating more resource-efficient developments. Assume that option 3 will comprise mitigation actions such as requiring developments to be triple glazed or enhancing green infrastructure.</p> <p><b>Recommendations/ Mitigation</b></p> <p>The council should ensure that mitigation measures are of the highest possible quality. For example it may be necessary to state that a certain number of trees are required as part of a development in order mitigate the impacts associated with a certain amount of new homes (i.e. do not just require ‘new green infrastructure’ as different types of green infrastructure will mitigate different impacts to differing extents).</p> <p>As part of option 3, constraints could be put in place to help ensure wider inclusivity and a reduction in social exclusion. For example, depending on the type of new green infrastructure proposed, it may be necessary to state that it must be open to the wider public.</p> <p>It is recommended that all options are progressed into policy. In order to effectively improve air quality construction impacts need to be mitigated and managed, and the impact of the development on the area needs to be mitigated and managed. In order to more effectively protect occupant’s health and wellbeing, the impact of existing poor air quality on occupants of new development needs to be mitigated and managed.</p>	

## Topic 9: Waste

### 9.1 Replacement Waste Site Locations

The Mayor of London wants as much waste as possible to be re-used, recycled and diverted away from landfill outside London. The London Plan sets a target for the amount of waste each London borough must manage, so that responsibility is shared fairly across the capital. A new target for Lambeth will be set in the new London Plan.

The Local Plan must identify enough land for waste to meet Lambeth's future target and to identify locations in the borough appropriate for new waste-related businesses. Lambeth's Local Plan already includes a policy on waste that safeguards existing waste sites and, if a waste site is redeveloped for other uses, requires the developer to provide another site for waste elsewhere in the borough. The Local Plan identifies Key Industrial and Business Areas (KIBAs) as the most appropriate locations for new waste facilities. This can cause difficulties for waste operators who want to change how they work London-wide and may wish to leave Lambeth altogether. Lambeth is considering allowing replacement waste sites to be located outside Lambeth so long as the Mayor of London assures Lambeth that they would not be penalised against its target.

The following table assesses three alternative options for delivering replacement waste sites for those lost as part of redevelopment schemes. Option 1 identifies specific sites in Lambeth whereas option 2 identifies broader areas in the borough (i.e. KIBAs). Option 3 allows replacement waste sites to be outside Lambeth, so long as Lambeth would not be penalised against its target.

#### Assessment of Alternatives

<b>Issue 9.1 Replacement Waste Site Locations</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Identify specific sites in Lambeth for additional waste management</li> <li>2. Identify broader areas for waste rather than allocating specific sites.</li> <li>3. Allow replacement waste sites to be outside Lambeth, so long as Lambeth would not be penalised against its target.</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	None of the three alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Some types of waste operations have the potential to adversely affect the amenity of surrounding areas through noise and other types of pollution, such as fine particulates. Studies have revealed that these have the potential to impact on people's health. However given the inexact alternative options, it is not possible to differentiate between them with regard to impacts on this objective. In general, sites identified for waste management should ideally be located away from residential areas with mitigation measures (if deemed necessary) to ensure that any nearby communities are not adversely impacted on. This issue will need to be looked at again when assessing site specific proposals.

<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>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands</p>	<p>Provision of waste sites to replace those lost through redevelopment will be necessary to facilitate future population and business growth. All of the options will identify replacement waste sites or areas and therefore there is no fundamental difference between the alternative options with regard to effects on this objective.</p>
<p>5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<p>The impact of the three options on equality and diversity will depend to a large extent on the location of sites or areas identified for new waste management uses. Waste uses tend to situate in lower value areas, which may have a disproportionate impact on households with lower incomes, who are more likely to live in areas where rents are cheaper. Option 1 looks to identify specific sites in Lambeth for additional waste management facilities therefore it could help to ensure that sites are situated away from residential areas. Option 2 identifies broader areas, such as KIBAs, for waste sites and so there could be a risk of local communities being possibly impacted upon (depending on the type of waste operation), potentially resulting in inequitable outcomes. However, in both cases the impacts of the development on residential amenity would be assessed through the site allocation and planning application processes, which should ensure any potential adverse effects on neighbouring residents is minimised.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>Option 3 allows for replacement waste sites to be located outside of the borough; therefore there could be more land available for residential development in Lambeth to help deliver more homes and more affordable homes. By identifying areas within Lambeth for waste sites, the future use of these sites could become very limited and so options 1 and 2 could restrict land available for future residential development and so may harm this objective. Maintenance and operation of waste sites close to residential areas will need to respect local amenities enjoyed by residents.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>If not well-managed or appropriately located, the presence of waste uses could potentially impact on liveability and place although it is important to recognise that not all waste operations are 'bad neighbour' or 'dirty' landuses. Option 3 allows replacement waste sites to move outside of the borough and so could better enable waste operators greater flexibility with regard to locations for potential new waste sites. This could make it easier for waste operators to undertake their work and reduce the need for their</p>

	<p>waste trucks to travel long distances. It could also have benefits at a London-wide level by helping to achieve the best strategic solution to managing London's waste.</p> <p>Option 1 identifies specific sites and thus the potential of these sites to deliver alternative land uses, such as other types of business use, could be harmed, with a possible risk of 'land blight'. Such sites may be vacant and/or derelict until required for replacement waste use. This would not be conducive to creating liveable environments that make people feel proud of their local area.</p>
<b>Environmental</b>	
<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>If not well-managed or appropriately located, the presence of waste uses could potentially impact on the quality, attractiveness and character of the built environment.</p> <p>Option 3 allows replacement waste sites to move outside of the borough and so could better enable waste operators greater flexibility with regard to locations for potential new waste sites. This could make it easier for waste operators to undertake their work and reduce the need for their waste trucks to travel long distances. It could also have benefits at a London-wide level by helping to achieve the best strategic solution to managing London's waste.</p> <p>Option 1 identifies specific sites and thus the potential of these sites to deliver alternative land uses, such as other types of business use, could be harmed, with a possible risk of 'land blight'. Such sites may be vacant and/or derelict until required for replacement waste use. This would not be conducive to improving the quality, attractiveness, character or sustainability of the built environment.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport</p>	<p>The location of new waste sites will have potential implications for transport and travel, depending on the nature of the proposed use. However, it is not possible to differentiate between the three options with regard to impacts on this SA objective. This issue will need to be looked at again when assessing site specific proposals.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>12 - Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable</p>	<p>Some waste operations can harm the environment by emitting harmful particulates however, as all of the options identify sites for replacement waste facilities, there is no</p>

energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	fundamental different between the alternative options on the achievement of the SA objective.
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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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.	It is considered that the three options all have the potential to have a significant positive impact on this SA objective. Identifying waste sites to replace those lost through redevelopment will be necessary to ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates. All of the options will identify sites or areas for replacement waste facilities, thus there is no fundamental difference between the alternative options with regard to performance against this objective.
15 - Air quality. To improve air quality	Options 2 and 3 offer greater geographical flexibility with regard to the location of potential new sites. Subsequently, efficiency of routes covered by waste lorries (that produce harmful vehicle emissions) could be improved and these options could decrease the need to travel, reducing overall pollution levels, and helping to improve air quality.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	Recycling is good for the economy and represents one of the fastest growing business sectors. In comparison to option 1, options 2 and 3 could ensure that waste operators have greater locational flexibility by allowing them a broader range of potential waste sites within which they can choose to operate. Thus options 2 and 3 could improve efficiency of routes and reduce the need to travel, decreasing travel costs and improving environmental performance of waste operation businesses. Identifying and safeguarding specific sites for additional waste management in Lambeth (option 1) is likely to restrict the potential future development/use of these sites, which could obstruct business growth and negatively impact on the achievement of this SA objective. With its proximity to central London, land values in Lambeth can be higher than other boroughs in Greater London. Accordingly, option 3 may provide waste operators with a more viable



	alternative than having to find a replacement waste site in the borough.
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.	Identifying new sites in Lambeth could re-use previously developed land and existing buildings. Therefore options 1 and 2 can have a positive impact on this objective. However, identifying and safeguarding specific sites for additional waste management in Lambeth (option 1) could restrict the potential future development/use of these sites, which could obstruct regeneration efforts and negatively impact on the achievement of this SA objective. It could be argued that option 3 offers improved efficiency of land use in the borough to provide priorities like housing and affordable housing and local jobs. However sufficient land for waste management would always need to be made available in London as a whole for this to hold true. With its proximity to central London, land values in Lambeth can be higher than other boroughs in Greater London. Accordingly, option 3 may provide waste operators with a more viable alternative than having to find a replacement waste site in the borough.
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.	Waste management uses can bring real benefits to the borough in jobs and skills. Options 1 and 2 are therefore likely to have a direct positive impact on this SA objective. While option 3 could result in the relocation of waste uses from the borough (with an associated loss of local jobs), although in principle former waste sites could be redeveloped for alternative employment uses which would create alternative forms of employment.
<p><b>Conclusions</b></p> <p>Option 1 identifies specific sites and thus the potential of these sites to deliver alternative land uses, such as other types of business use, could be harmed, with a possible risk of 'land blight'. Consequently business growth in the areas could be adversely impacted on. Such sites may be vacant and/or derelict until required for replacement waste use. This would not be conducive to creating liveable environments that make people feel proud of their local area.</p> <p>Options 1 and 2 seek to keep replacement waste sites in Lambeth and so, in principle, the borough should experience no net loss of jobs and would experience the economic benefits of new businesses in the green industry sector. In turn, both of these options can enable the council to better manage where new waste sites are to be located and so ensure relationships with existing land uses are managed effectively for the benefit of both businesses and residents.</p> <p>Options 2 and 3 could ensure that waste operators have greater locational flexibility by allowing them a broader range of potential waste sites within which they can choose to operate. Thus options 2 and 3 could improve efficiency of routes and reduce the need to travel, decreasing travel costs, lower land/site costs and improving environmental performance of waste operation businesses with associated improvements in air quality.</p> <p>Option 3 allows replacement waste sites to move outside of the borough and so could better enable waste operators greater flexibility with regard to locations for potential new waste sites. This could make it easier for waste operators to undertake their work and reduce the</p>	

need for their waste trucks to travel long distances. It could also have benefits at a London-wide level by helping to achieve the best strategic solution to managing London's waste.

**Uncertainties/ Assumptions**

This assessment acknowledges that the impacts of some types of waste sites on health are unknown. This assessment assumes that option 1 will only identify a handful of specific sites for additional waste management across the borough.

**Recommendations/ Mitigation**

## Topic 10: Transport

### 10.1 Transport Modes

The council already promotes improvements to public transport and provides support to encourage more walking and cycling, however the council will need to expand its efforts to accommodate growth in the borough without that leading to more traffic and congestion.

Walking is a part of almost all trips and the most common transport mode in the borough. Lambeth has enormous untapped potential for more people to cycle. In order to reduce reliance on private cars and relieve pressure on public transport Lambeth could encourage more people to walk and cycle. People on foot and on bikes need to be confident of their safety and routes need to be convenient and attractive for all.

The following table assesses four alternative options for encouraging different transport modes in Lambeth. The first three options focus on encouraging alternative modes to private car use such as walking, cycling and public transport. Option 4 does not encourage alternatives to cars.

#### Assessment of Alternatives

<b>Issue 10.1 - Modes of Transport</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Encourage more people to walk, cycle and use public transport rather than travel by car</li> <li>2. If encouraging people to use alternatives to cars, focus mostly on public transport</li> <li>3. If encouraging people to use alternatives to cars, focus mostly on walking and cycling (e.g. make walking and cycling as safe as possible so that no-one is put off because streets are inaccessible or feel unsafe to them)</li> <li>4. Not encourage people to use alternatives to cars</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	Options 1, and 3 in particular, could have a positive impact on this objective as they have the potential to increase the number of pedestrians and cyclists using streets for transport. Option 3 also outlines that it will make walking and cycling as safe as possible so that no-one is put off because streets are inaccessible or feel unsafe to them. For example, new lighting measures for night-time travel could help animate streets across the borough and benefit this objective. Higher pedestrian numbers are likely to improve natural surveillance which can then help to deter criminal activity and reduce fear of crime and so option 3 is likely to have a direct positive impact on this SA objective. Options 2 and 4 are not envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Options 1 and 3 are likely to contribute to the achievement of this SA objective by encouraging physical exercise and, in turn, reducing harmful vehicle emissions and pollutants. Option 2 could similarly have a positive impact on this objective albeit to a lesser extent; buses for example still emit harmful gases.

	By not encouraging alternatives to cars, option 4 is likely to harm the health and well-being of Lambeth's population as greenhouse gas emissions from cars could potentially increase, and active travel modes aren't encouraged.
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.	Options 1, 2 and 3 could help to reduce car use and so roads should become less congested and reduce travel times for those, such as disabled people, who require use of private transport. By encouraging a range of different transport modes, option 1 could increase overall accessibility to key services and facilities by catering to more of the requirements of the population. Option 4 does not encourage people to use alternatives to cars and so could limit Lambeth's ability to create fully accessible and inclusive environments. Many streets are already saturated by high traffic levels, especially during commuting times and so the scope to further improve the quality of car travel across the borough is limited.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Option 3 is likely to have the greatest positive impact on this SA objective as this will relieve pressure on existing public transport infrastructure and congested streets.  Conversely, by not encouraging alternatives to cars, option 4 could increase pressure on existing congested roads. Moreover, infrastructure necessary to meet future transport demands is unlikely to be encouraged through this option and so it could have a negative impact on this objective.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	People require different transport options based on costs, journey times, preferred travel options and health issues. Consequently option 1 is most likely to provide the largest variety of alternative options for the wider population and therefore have the greatest positive impact on this sustainability objective. Public transport improvements also have the potential to promote equity and fairness across the borough by enabling all communities to access services, facilities and employment opportunities. Thus options 1 and 2 could benefit this objective. Lambeth should ensure that provision is met for population groups who require car use, such as the disabled. Options 1, 2 and 3 could help to reduce traffic and so improve travel conditions for these populations.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes	Option 3 could create environments that promote sustainable lifestyles by enhancing the quality of the public realm in order to encourage walking and cycling. Such improvements could also help to enhance sense of place.

<p>long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>In turn, along with option 1, option 3 can help grow more healthy and sustainable communities. These options have the potential to reduce noise pollution across the borough by reducing car use. This could enhance liveability. Option 4 is not likely to achieve any improvements to our existing travel infrastructure and so will not positively impact on lifestyles, social cohesion or improve sense of place.</p>
<p><b>Environmental</b></p>	
<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>Option 3 has the potential to improve the quality and sustainability of the built environment by re-designing streets to make them more attractive to pedestrians and cyclists. Option 2 also has the potential to impact on the built and historic environment, depending on the way in which the council intends to encourage greater use of public transport. Cars produce harmful particulates and emissions that can harm the quality and sustainability of the built environment. Option 4 could result in an increase in car use, as alternatives are not encouraged and therefore harm this objective.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport</p>	<p>Options 1, 2 and 3 have the greatest potential to contribute positively to the achievement of this objective by reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport. Option 1 encourages walking, cycling and public transport so, along with options 2 and 3, it could reduce reliance on the private car, reduce the overall level of road traffic and encourage a shift towards more sustainable forms of travel such as walking, cycling and public transport. Option 4 is likely to have a negative impact on the achievement of this SA objective.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>Encouraging more people to use alternatives to cars could positively impact on this SA objective if it were to reduce the number of new private car parking spaces created in front gardens for example. This could enable more opportunities for biodiversity to thrive and bring nature closer to people. Options 1, 2 and 3 encourage alternatives to cars and so could help to reduce emissions, improve the environmental quality of Lambeth and have a positive impact on this objective.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>Improving environments for walking and cycling often involves use of green infrastructure. By making walking and cycling routes and desire lines more attractive and safe, it is more likely that people will use them to walk or cycle through. 'Greenways' or green corridors can be used to link green spaces, increasing the green infrastructure network, and providing an environment more conducive to walking and cycling. It is considered that options 1 and 3 have potential to impact positively on this objective.</p>

<p>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>	<p>Options 1, 2 and 3 are likely to impact positively on this SA objective. Option 3 is likely to minimise energy consumption and greenhouse gas emissions as it encourages carbon free modes of transport. Options 1 and 2 have the potential to also reduce greenhouse gas emissions from cars though buses still emit the gases and so these options will not benefit this objective to the same extent as option 3. However, use of public transport results in less greenhouse gas emissions than use of private vehicles. Option 4 is likely to result in adverse effects on the achievement of this objective.</p>
<p>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>	<p>Runoff from roads contains pollutants that can enter waterways and have harmful effect on water quality. Option 4 is therefore likely to result in adverse effects on water quality. Options 1, 2, and 3 seek to reduce the number of cars on the road and therefore would likely have a limited positive effect on the achievement of this SA objective. Limiting the number of cars on the road might result in opportunities to improve green infrastructure and increase water infiltration, thereby minimising flood risk.</p>
<p>14 - Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.</p>	<p>None of the proposed policy options have a significant any effect on the achievement of the SA objective.</p>
<p>15 - Air quality. To improve air quality</p>	<p>Options 1, 2 and 3 could all potentially have a significant positive impact on this SA objective, by encouraging alternative forms of transport to cars which emit exhaust fumes, and also produce large amounts of tiny pollution particles from brake and tyre dust. Option 3 is likely to benefit this objective the most by increasing the prevalence of pollution free travel and possibly creating more opportunities to develop green infrastructure which can further improve air quality.</p>
<p><b>Economic</b></p>	
<p>16 - Education and skills. To maximise the education and skills levels of the population.</p>	<p>Option 3 has the potential to increase exercise levels (if more people walk and cycle). These are likely to result in improved cognitive ability of children/young people and could improve their academic performance.</p>
<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>Options 1, 2 and 3 could result in less congested roadways. This could reduce travel times and increase business productivity. Improvements to the public transport network, for example via option 2, could result in businesses being able to travel further more easily and thus could break into new markets and enlarge their customer base. Improved PTAL values may also make it easier for local businesses to recruit employees.</p>
<p>18 - Regeneration and efficient use of land. To stimulate</p>	<p>Major transport projects act as a stimuli for further investment. Therefore options 1, 2 and perhaps to a lesser</p>

<p>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>	<p>extent option 3, are likely to lead to further inward investment around existing transport hubs and further stimulate new development projects.</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>Options 1, and 2 in particular, have the potential to increase access to wider areas and hence more employment opportunities.</p>
<p><b>Conclusions</b></p> <p>The assessment demonstrates that Lambeth’s priority should be to continue discouraging people from using cars. Options 1, 2 and 3 are likely to positively impact on this objective by encouraging alternative forms of travel. Options 1 and 3 are likely to contribute to the achievement of health and wellbeing objectives by encouraging physical exercise and, in turn, reducing harmful vehicle emissions and pollutants which in turn results in improved respiratory health and improved air quality. Option 2 could similarly have a positive impact on health albeit to a lesser extent; buses for example still emit harmful gases (although it is recognised that the number of hybrid electric and fully electric buses are increasing). By not encouraging alternatives to cars, option 4 is likely to harm the health and well-being of Lambeth’s population as greenhouse gas emissions from cars could potentially increase, and active travel modes aren’t encouraged.</p> <p>In terms of social equity, people require different transport options based on costs, journey times, preferred travel options and health issues. Consequently option 1 is most likely to provide the largest variety of alternative options for the wider population and therefore have the greatest positive impact on equality objectives. Public transport improvements also have the potential to promote equity and fairness across the borough by enabling all communities to access services, facilities and employment opportunities. Lambeth should however ensure that provision is met for population groups who require car use, such as the disabled. Options 1, 2 and 3 could help to reduce traffic and so improve travel conditions for these populations.</p> <p>Accordingly it is considered that options 1, 2, and 3 much more likely to better cater to a wider range of transport needs and preferences whilst providing positive effects on the environment, health and the economy. Option 4 does not encourage alternatives and so is unlikely to have a positive impact on a range of Lambeth’s sustainability objectives.</p> <p><b>Uncertainties/ Assumptions</b></p> <p>There are uncertainties around whether people who currently travel by car would actually change to a different transport mode. It has been assumed that public transport improvements will further improve disabled public transport provision and that public transport improvements could include more renewable solutions such as electric buses. It has also been assumed that investments in walking and cycling may include developing car-free zones and refurbishing streets by constricting vehicular travel ways and potentially creating new green infrastructure. This assessment also assumes that option 3 will improve lighting, for example along streets to make them safer at night time.</p> <p><b>Recommendations/ Mitigation</b></p>	

## 10.2 Ways of Managing Roadspace

Most households in Lambeth do not own a car, however the overall number of car trips in the borough is expected to increase due to population growth. To avoid this Lambeth should reduce reliance on private cars by offering attractive alternatives and making remaining car trips cleaner and more efficient. Lambeth could also consider how to protect residential streets from ‘rat running’ traffic that is likely to result from increased congestion on main roads.

Private cars are parked for 95% of the time, taking up much of the space on our streets. Despite fewer people owning cars than in the past, demand for parking is still high and on some streets every available space is taken up. Not only does this make it difficult for residents to park, but it also restricts our ability to meet other needs, such as crossing points, cycle facilities, car club bays and electric vehicle charging points.

Buses can move large numbers of people around without taking up a lot of road space. If congestion on main roads worsens, then bus journey times will be affected and this will make travel by bus less attractive. A comprehensive, reliable and convenient bus service is particularly important for Lambeth given limited coverage by tube services in the borough.

The following table assesses five alternative options for managing road space in Lambeth. Option 5 does not propose any changes to policy in the current Local Plan.

### Assessment of Alternatives

<b>Issue 10.2 - Managing Roadspace</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. Give more priority to buses across the borough</li> <li>2. Develop measures to reduce overall traffic levels and protect local streets from ‘rat running’ traffic</li> <li>3. Use parking controls to manage demand for parking, prioritising the needs of residents and protecting essential access.</li> <li>4. Prioritise alternative uses of the kerbside such as car club bays, cycle parking and electric vehicle (EV) charging points, in response to user demand</li> <li>5. No change to current position</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder.	None of the proposed relative policy options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Option 4 could help to facilitate cycling in Lambeth and so aid health and wellbeing by encouraging physical exercise. Car clubs can help to reduce private car ownership and potentially encourage alternative transport modes to cars, potentially reducing pollution of harmful gases. Option 4 could also help to facilitate the growth of electric cars thus option 4 could reduce harmful vehicle emissions that could have resulted from car use. Option 2 could also help to reduce pollution levels by reducing overall traffic levels as could option 1, however buses can emit dangerous pollutants and particulates so option 1 may not benefit this objective to the same extent as options 2 and 4. (However it is



	recognised that bus fleets are increasingly getting greener in their operation.)
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.	Buses provide the most accessible, convenient and affordable form of transport to a number of population groups. By giving more priority to buses, option 1 could help such populations groups, including the elderly and the disabled for example, better access key services and facilities. Likewise, option 2 could help to reduce congestion levels and aid accessibility to key services and facilities. Option 3 is likely to directly help those who require car use, such as disabled people, by prioritising the needs of residents and protecting essential access. Option 4 has the potential to help deliver alternative means of transport (i.e. car clubs, cycling) for those who do not own a car.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	Option 4 could have a positive impact on this objective by prioritising alternative uses of the kerbside such car club bays, cycle parking and electric vehicle (EV) charging points. All of these uses are likely to grow in the future and so option 4 could help to facilitate such growth. By reducing traffic levels, option 2 could reduce pressure on existing road infrastructure however it could potentially divert this pressure onto the public transport network.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	Buses provide the most accessible, convenient and affordable form of transport to a number of population groups, thus option 1 could help to ensure equitable outcomes for these groups. Option 2 could help to stop 'rat running' and so reduce congestion and improve environmental conditions along these streets. However this measure could divert more traffic on other streets and negatively impact on other communities. Option 3 is likely to help those who require a car better access their vehicle and so benefit this objective. Option 4 could improve local environmental conditions by improving local pollution levels.
6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Options 2 and 3 could help residents have quiet enjoyment of their home and local amenity.
7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place.	Option 4 prioritises alternative uses of the kerbside and could facilitate growth in sustainable transport modes such as cycling. Thus this could help to promote sustainable living and potentially help to create social cohesion and a sense of place. Option 2 could enhance the public realm and help enable people to feel better about the places they live by reducing traffic levels.
<b>Environmental</b>	

<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>Option 4 could improve the quality, sustainability and the attractiveness of the built environment by prioritising alternative uses of the kerbside.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.</p>	<p>Options 1, 2 and 4 are most likely to positively impact on this SA objective. Option 1 could potentially reduce overall road traffic by prioritising buses over car travel for example. Option 2 similarly seeks to reduce the overall level of road traffic. Option 4 could do likewise by facilitating the growth of cycling and car clubs could help reduce car ownership.</p>
<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>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>	<p>Option 1 could minimise overall energy consumption by giving priority to buses and potentially reducing car use. Likewise, option 2 seeks to reduce traffic which could reduce greenhouse gases. Option 4 is likely to reduce greenhouse gas emission by encouraging cycling and alternatives to privately owning an internal combustion engine powered vehicle.</p>
<p>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>	<p>Options 1 and 2 that seek to reduce car use might result in reduced pollutants entering waterways via runoff from roads. Positive effects on water quality are likely to be minor/limited.</p>
<p>14 - Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>15 - Air quality. To improve air quality</p>	<p>Options 1 and 2 could improve air quality overall by potentially reducing car traffic levels. Option 3 is not likely to have a significant effect on this SA objective. Option 4 could improve air quality by encouraging alternatives to privately owning an internal combustion engine powered vehicle. Car clubs could have both positive and negative impacts on this objective by either reducing or increasing car use across the borough.</p>
<p><b>Economic</b></p>	

16 - Education and skills. To maximise the education and skills levels of the population.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	Options 1 and 4 could improve the environmental performance of business by facilitating a reduction in use of private vehicles.
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.	Option 4 priorities alternative uses of the kerbside and thus might use these pieces of land more efficiently. This could have a positive impact on this objective, although it is likely to be <i>de minimus</i> .
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.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
<p><b>Conclusions</b></p> <p>Each of the options potentially has positive sustainability benefits associated with them as outlined above. Option 1 prioritises buses – this will improve a form of mass transit and so is likely to improve overall transport sustainability across the borough and could potentially reduce overall traffic levels and greenhouse gas emissions, particularly at peak times and/or through use of bus only lanes. Option 2 could also reduce emissions whereas option 3 could enable those who require a car to better access their vehicle. When compared to private car use, option 4 can help to facilitate the growth of more sustainable transport alternatives such as cycling. All of the options can be used to help inform new policies.</p> <p><b>Uncertainties/ Assumptions</b></p> <p>There are uncertainties around how option 2 will reduce overall traffic levels. Uncertainties remain around providing electric charging points as they may encourage more people to acquire private cars and so the borough may continue to experience large amounts of tiny pollution particles from brake and tyre dust. It is hoped that electric cars could replace the more traditional, internal engine powered private cars, especially for those who actually require use of a car i.e. disabled people. It has been assumed that option 1 could result in a higher number of people travelling by bus, however there are uncertainties around whether people who travel by car would actually change to a different transport mode. Real-time information about bus arrivals and departure times is considered crucial in encouraging more people to use the bus as their preferred mode of travel.</p> <p><b>Recommendations/ Mitigation</b></p>	

### 10.3 Car Free Developments

The current Local Plan outline that developments should be car-free, including permit-free and permit-capped schemes, particularly in areas where alternative modes of transport are available and where public transport accessibility is high. The following table assesses four alternative options for locations where car-free developments should be required in Lambeth. Option 1 requires all new developments to be car free (except for disabled parking), whereas the other options only require car-free developments in certain areas of the borough.

#### Assessment of Alternatives

<b>Issue 10.3 – Car Free Developments</b>	
Reasonable alternatives:	
<ol style="list-style-type: none"> <li>1. All new development should be car free except for disabled parking</li> <li>2. New development should be car free except for disabled parking in parts of the borough that are most polluted/congested</li> <li>3. New development should be car free except for disabled parking in parts of the borough that have the highest access to public transport</li> <li>4. Development should be car free particularly in areas where alternative modes of transport are available and where public transport accessibility is high - No change to current position</li> </ol>	
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>
<b>Social</b>	
1 - Crime and safety. Ensuring safe communities with reduced crime and disorder	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
2 - Health and well-being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health.	Physically, in comparison to active transport modes, cars are not a healthy way of travelling. Consequently all of the options, especially option 1 are likely to result in a reduction in car use and promote a healthier borough by ensuring developments are car free, except for disabled parking and thereby helping to reduce causes of ill 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.	For less mobile members of the population such as families with young children, or independent traders who require use of a van, private transport modes may be the preferred mode of transport. All of the options, especially option 1, could restrict their accessibility levels by restricting parking. Option 4 is least likely to restrict overall accessibility to key services and facilities for those whose require a car by promoting car free developments only in areas where alternative modes of transport are available and where public transport accessibility is high.
4 - Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands	All of the options could result in significantly fewer parking spaces being required in new development leaving more space to deliver forms of essential infrastructure such as health facilities, other transport infrastructure, schools or green infrastructure.
5 - Equality and diversity. To ensure equitable outcomes for all communities, particularly those	The absence of car parking spaces could disadvantage population groups who may require them, however disabled parking will still be allocated as part of all

<p>most liable to experience discrimination, poverty and social exclusion.</p>	<p>development schemes. For people with young children or less mobile members of the population, cars may be the preferred and sometimes required mode of transport. All of the options, especially option 1, could potentially adversely affect these groups.</p>
<p>6 - Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.</p>	<p>By requiring all new developments to be car free, option 1 could help to increase the floorspace available to physically develop and so increase the number of homes constructed on site. Options 2, 3 and 4 could similarly all help to deliver more homes in this way albeit to a lesser extent. Accordingly these options potentially help to deliver more housing on-site. However, just because parking is not provided as part of new development does not mean that occupiers will not want or require a car. And such cars will inevitably be parked on local streets unless other parking management measures are in place. In the absence of these, this might have adverse effects on local amenity.</p>
<p>7 - Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place</p>	<p>Option 1 should increase the overall amount of floorspace available and thus open up more spaces for designers to create sustainable mixed use environments. In turn it could increase the amount of land available to be used as public realm and so increase social cohesion and sense of place. Increases in car free developments could reduce demand for cars and improve the wider liveability of Lambeth (although recognising that some population groups might require car travel, eg young families).</p>
<p><b>Environmental</b></p>	
<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>By resulting in more space for development and potentially reducing overall car use, all options will help to enable more opportunities to directly improve the public realm and wider environment, potentially by enhancing open space/green infrastructure provision. But if people want or require a car, all options will likely result in more on-street parking. In terms of option 2, this could exacerbate existing problems with congested roads unless other parking management measures are in place.</p>
<p>9 - Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport</p>	<p>Of all the options, option 1 is most likely to reduce car use and thus reliance on the private car by requiring all developments to be car free. This measure could help to reducing road traffic levels and increase the likelihood of alternative transport modes being used. But if people want or require a car, option 1 will likely result in more on-street parking. All of the options, especially option 1, could have potential to positively impact on this objective, assuming occupiers of new development are not insistent of car ownership/use.</p>

<p>10 - Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people</p>	<p>In theory option 2 could reduce pollution levels in the most polluted areas of the borough by potentially discouraging car use. Such a measure could therefore enhance biodiversity in these locations. However, if occupiers of new development want or require car use then on-street car parking could increase, exacerbating existing congested streets unless other parking management measures are in place. Option 1 will do likewise for the whole borough, option 3 and 4 will benefit biodiversity in areas where there is good access to public transport. Benefits to biodiversity are likely to be limited, and would only result if occupiers did not choose to own a vehicles and park it on street.</p>
<p>11 - Green infrastructure. To create, manage and enhance green infrastructure.</p>	<p>All options have the potential to minimise the amount of on-site parking and so enable these spaces to potentially be designated for other uses, which could include green infrastructure improvements.</p>
<p>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>	<p>All options have the potential to discourage people using cars by reducing levels of parking in new developments. Consequently greenhouse gas emissions could reduce and the options could have a positive impact on this SA objective. However, just because parking is not provided as part of new development does not mean that occupiers will not want or require a car. And such cars will inevitably be parked on local streets unless other parking management measures are in place.</p>
<p>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>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>14 - Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.</p>	<p>None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.</p>
<p>15 - Air quality. To improve air quality</p>	<p>Option 2 could improve air quality in the areas of the borough that are most polluted/congested by discouraging car use and thus encouraging people to use alternative, cleaner forms of transport. However, option 1 has the potential to better improve air quality overall by exempting parking in all new developments across the borough. However, just because parking is not provided as part of new development does not mean that occupiers will not want or require a car. And such cars will inevitably be parked on local streets. This could lead to idling and congested streets (many streets essentially become</p>

	'one way' when vehicles are parked on either side of the street), which is not conducive to improved local air quality. Mitigation measures such as parking management would help address this.
<b>Economic</b>	
16 - Education and skills. To maximise the education and skills levels of the population.	None of the alternative options are envisaged to have a significant effect on the achievement of the SA objective.
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	Car free developments could result in businesses using alternative, cleaner forms of transport and so improve the environmental performance of businesses. Thus all of the options have the potential to have a positive impact on this objective. However, restricting car parking in all new commercial developments could potentially have a negative impact on this SA objective if it has the effect of discouraging people from visiting/accessing new services or facilities. It could also have the effect of inhibiting organisations ability to attract staff in areas with lower PTAL levels.
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.	Option 1 is most likely to enable the most efficient use of land as all new developments will no longer require parking to be a key consideration. Consequently other uses could be implemented that will help 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. However, just because parking is not provided as part of new development does not mean that occupiers will not want or require a car. And such cars will inevitably be parked on local streets. This could lead to congested streets (many streets essentially become 'one way' when vehicles are parked on either side of the street), which is not conducive to efficient use of land. Mitigation measures such as parking management would help address this.
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.	Option 1 may reduce access to employment if people are only able to travel to places of work by car. However more jobs could be provided on development sites as car parking spaces are freed up for alternative uses such as offices or workspaces.
<b>Conclusions</b>	
All of the options have potential to reduce the harm posed by private car use (i.e. air pollution, road traffic, noise pollution) by reducing levels of parking in new development in Lambeth and thus perhaps encouraging other, cleaner modes of transport. In this way, option 1 is likely to benefit the borough the most by requiring all new developments to be car free except for disabled parking. However, just because parking is not provided as part of new development does not mean that occupiers will not want or require a car. And such cars will inevitably be parked on local streets. This could lead to congested streets (many streets	

essentially become 'one way' when vehicles are parked on either side of the street), which is not conducive to efficient use of land.

It is acknowledged that all of the options are likely to adversely affect some population groups who require the use of a car (except for disabled people) and thus potentially harm their accessibility to key services, facilities or perhaps even jobs. Options 2 and 3 offer some mitigation against this by only requiring car free developments in certain areas of the borough.

**Uncertainties/ Assumptions**

Assume that car free developments will encourage more people to use other, more sustainable transport modes. For any of the options to have truly positive impacts on environmental indicators and health and wellbeing, occupiers of new development need to relinquish any desire to own a car and be persuaded to use other modes of transport. In this regard, options 3 and 4 might have better chance of resulting in more positive effects on environmental quality.

**Recommendations/ Mitigation**

All of the options could be amended to say 'New development should be car free except for disabled parking or badge holders' in order to not harm the ability of those who require a car / van to travel in Lambeth.