

SUSTAINABILITY APPRAISAL:

LAMBETH LOCAL PLAN PROPOSED SUBMISSION

NON-TECHNICAL SUMMARY AND FULL REPORT

October 2013



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* available electronically or on request

<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/LocalPlan/SustainabilityAppraisalForThePlanningPolicyEvidenceBase.htm>

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NON-TECHNICAL SUMMARY
Sustainability Appraisal Lambeth Local Plan
Proposed Submission

October 2013



NON-TECHNICAL SUMMARY CONTENTS PAGE

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1. Introduction

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

1.2 The Non-Technical Summary is part of the Sustainability Report for the Lambeth Local Plan Proposed Submission November 2013 (referred to as the Local Plan). The SA report has been produced alongside the Local Plan to provide guidance on its development. This report presents the key findings to date of the Sustainability Appraisal on the Local Plan and provides background and relevant additional information.

2 The Local Plan

2.1 A new Local Plan for Lambeth includes the existing Core Strategy 2011 and new detailed planning policies for development management and sites. The vision, strategic objectives and spatial strategy of the Core Strategy has not changed (other than factual updating), as they have been recently developed and adopted.

2.2 The Local Plan sets out the general approach and specific policies for development. It identifies sites for development within Lambeth to cover the period up to 2030. It is based on the social, economic and environmental aims of the Lambeth Community Plan 2013 – 2016 together with other relevant plans, programmes and strategies.

2.3 Proposed updates or highlights of new Local Plan policy include:

- § Clear strategy for delivery growth in Waterloo, Vauxhall and Brixton and place specific policies for town centres
- § Developments of less than 10 new homes to make a financial contribution to affordable housing
- § New ways of assessing proposals for student housing such as being part of a mixed use development and linked to a college or university
- § Controls on the number of betting shops, pawn brokers, and money shops (A2 uses) in one area
- § Protection of public houses
- § Key Industrial Business Areas (KIBAs) only allowed for business and industrial uses and the exception to allow schools is removed
- § Preventing new hot food takeaways opening within 400m of a primary or secondary school.

3 The Sustainability Appraisal

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

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

Table 1: SA process thus far

| Date | Actions |
|--|--|
| SA Stage A: Setting the context and objectives, establishing the baseline and deciding on scope | |
| November 2008 | The first Scoping Report was published for consultation over a five-week period from early November 2008 and provided a summary of the current environmental, social and economic conditions in Lambeth. This baseline information of the Scoping Report assisted in the development of the Sustainability Appraisal Framework. |
| September 2010 | The Scoping Report March 2009 was updated in preparation of producing other Development Plan Documents. The Sustainability Framework was reviewed at this time and was broadly found to remain relevant for the development management policies however; it was considered that the Framework should be adapted for appraising the site allocations |
| October and November 2010 | A joint consultation exercise was carried out on the updated SA scoping in October and November 2010. Consultation responses were received from the following organisations: <ul style="list-style-type: none"> • English Heritage; • Environment Agency; • Lambeth Primary Care Trust; • Coal Authority; • Highways Agency; • Lambeth Council ecologist; and • Lambeth police/community safety |
| Stage B: Developing and refining alternatives and assessing their effects; and Stage C: Preparing the Sustainability Appraisal Report | |
| March 2009 | A Sustainability Appraisal was carried out on the draft Core Strategy which made 60 recommendations to the Council for consideration into the Core Strategy. Many recommendations were included in the Submission Version Core Strategy, demonstrating the meaningful influence the SA has had on plan preparation in Lambeth. |
| August 2009 | An SA Report on the Submission Core Strategy was prepared following consultation in April and May 2009 on the draft Core Strategy and its accompanying SA. Recommendations made in this SA generally fell into two categories: <ul style="list-style-type: none"> • identification of issues within policies that were considered to be addressed in other policies; or • identification of issues that will be helpful in the preparation of the development management policies. |
| January 2011 | The August 2009 SA Report was submitted with the Submission Version Core Strategy which was adopted in January 2011. On adoption of the Core Strategy, the Council published its SA Adoption Statement. |
| February 2013 | A SA was prepared on the draft Local Plan. This made 176 recommendations to improve policy performance of the Plan (i.e. maximise positive effects or reduce negative effects). The Council considered each recommendation and where appropriate, changes were made to policy in the revised Local Plan. |
| October 2013 | This SA Report predicts and evaluates the significant effects of the latest version of the Local Plan. Where appropriate, recommendations have been made to reduce adverse effects and maximise beneficial effects. |
| Stage D: Consulting on the Local Plan and SA Report | |
| March 2013 | The SA Report (Feb 2013), along with the draft Local Plan were both available for public consultation for 6 weeks. The feedback received from this consultation was considered for the final Local Plan document. |
| October 2013 | This SA Report (October 2013) is available as a supporting document to the Lambeth Local Plan Proposed Submission November 2013. |
| Stage E: Monitoring the significant effects of implementing the Local Plan | |
| October 2013 | The Sustainability Appraisal makes recommendations for how significant and uncertain effects of the Local Plan should be monitored. |

- 4.1 The London Borough of Lambeth covers an area of about ten and a half square miles, including Waterloo and the South Bank, Vauxhall, the Oval, Kennington, Stockwell, Clapham, Brixton, Loughborough Junction, Herne Hill, Streatham, Tulse Hill, West Norwood and Gypsy Hill. Located in the southwest of London, Lambeth has approximately 3.2 kilometres of Thames frontage, and is situated on the southern bank of the Thames neighbouring the boroughs of Southwark, Croydon, and Wandsworth and Merton to the east south and west respectively, and Westminster and the City of London to the north across the Thames. Lambeth is an inner London borough with the north of the borough having a mix of central London activities, while the south of the borough is predominately suburban in character.
- 4.2 Lambeth is an area of contrasts. The northern part of the borough features internationally-significant central London activities centred around Waterloo and South Bank area, including the South Bank Centre, major corporate offices, the London Eye and Oval Cricket Ground. South are the varied centres of Brixton and Clapham with their unique blend of entertainment, speciality retail and cultural industries, surrounded by a culturally-diverse residential population. Further south again are the suburbs of Streatham and Norwood which also feature locally important town centres. With no strategic industrial locations in Lambeth, locally significant sites known as Key Industrial Business Areas are protected and these are scattered throughout the Borough providing a total area of 47.9 hectares.
- 4.3 The Borough has an important historic environment with 62 Conservation Areas covering approximately 30 per cent of the Borough including circa 2,500 listed buildings, the vast majority of which are nineteenth century residential dwellings. There are also 17 Archaeological Priority Zones and eight historic Registered Parks and Gardens as well as protected strategic views in the north of the borough of St Pauls Cathedral and the Palace of Westminster which is a World Heritage site.
- 4.4 Table 2 below lists key statistics in Lambeth for sustainability topic areas.

Table 2: Key sustainability statistics in Lambeth

| Social | |
|----------------|--|
| Crime | <ul style="list-style-type: none"> § For the financial year 2012/13 total number of crimes decreased by 6.2 percent to 34,841 total crimes § Total Notifiable Offences (TNOs) fell for eight successive years between 2001 and 2009. Even following a small rise in 2009/10, TNOs were still more than 30% below the figure for 2000. § A recent survey found that 69% of residents feel safe when outside in the area they live after dark, up from 54% in November 2009. |
| Health | <ul style="list-style-type: none"> § Lambeth fares comparatively worse for health inequalities when compared nationally § Lambeth male life expectancy is 77 years compared with England average of 78.5 years; Lambeth female life expectancy is 81 years compared with 82.5 year England average § Healthy lifestyle issues still a concern (smoking, obesity, lack of physical activity, alcohol, drug misuse) § About 18% of Lambeth households are estimated to be in fuel poverty |
| Infrastructure | <ul style="list-style-type: none"> § Existing transport infrastructure is very well used and over capacity in places § Number of school places currently insufficient to meet future demand § Insufficient capacity in Lambeth cemeteries to deal with future demand for burials § Lambeth has 270 hectares of open space which is about 10% total land area. |
| Equality | <ul style="list-style-type: none"> § 14th most deprived borough in England, comparable with Southwark, Lewisham and Haringey, but less deprived than most deprived boroughs of Newham, Tower Hamlets and Hackney § very diverse constantly evolving Borough ethnically, culturally, socially and economically § Lambeth has one of the highest Black African and Black Caribbean populations in London (11.5% and 9.8% of total borough population respectively) as well as sizeable Portuguese, Polish and Vietnamese communities. § 55% of Lambeth residents identify themselves as Christian, 6% as Muslim and 33% say they do not have a religion |
| Housing | <ul style="list-style-type: none"> § 73% of stock is flats – typical of inner London |

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| | <ul style="list-style-type: none"> § Approx 67% households live in rented accommodation; 30% own their own home (amongst lowest nationally for occupiers and mortgagees) § Urgent need for more affordable housing, especially for families § 130,000 households in Lambeth |
| Liveability | <ul style="list-style-type: none"> § Population churn is at around 22-24% for last few years; about 88% of population remains same each year § Some communities feel their neighbourhoods lack stability and that not enough households stay long enough to put down roots. |
| Heritage | <ul style="list-style-type: none"> § In 2012 there were 40 buildings on the Heritage at Risk register |
| Environmental | |
| Open Space | <ul style="list-style-type: none"> § total area of open space in Lambeth is just less than 844 hectares, representing 31 percent of the area of the borough § Current provision of unrestricted open space is approximately 1.49 hectares per 1,000 people, although access is unevenly spread and particularly limited in the north of the borough. This figure is similar to that for other inner London boroughs |
| Biodiversity | <ul style="list-style-type: none"> § 10 priority habitats and 7 priority species in Borough § 45 Sites of Importance for Nature Conservation; 96% in positive management. |
| Carbon emissions | <ul style="list-style-type: none"> § Lambeth's total CO₂ emissions within the scope of influence of the Local Authority was 1290.4 kilotonnes CO₂ for 2009 § Industry and commercial uses accounted for 39%, domestic accounted for 41% and the remaining 20% was attributed to road transport. § Lambeth has achieved a 12% per capita reduction in emissions since 2005 |
| Flood risk | <ul style="list-style-type: none"> § Much of north of Borough is within flood zone 3a for 1 in 100 year flooding from Thames § Some flood risk around River Wandle |
| Water | <ul style="list-style-type: none"> § Average household water consumption in 2010/11 was 166.5 litres per person per day |
| Waste | <ul style="list-style-type: none"> § Total amount of waste arising in Lambeth has continued to decrease periodically § Household waste recycled has increased from 10% in 2001/02 to almost 28% 2010/11 § Current shortfall of 197,417 tonnes per annum between capacity of existing waste sites in Lambeth and London Plan apportionment to 2031 |
| Air | <ul style="list-style-type: none"> § Whole Borough in Area Quality management Area § Borough continues to suffer from high levels of fine particles (PM10) and Nitrogen Dioxide – much like London as a whole |
| Economic | |
| Economy | <ul style="list-style-type: none"> § Around 10,000 business in Lambeth of which 75% have fewer than 5 employees § Over 99% of businesses in Borough are small and medium enterprises § Relatively high levels of unemployment – October 2012 it was 5.6% of the population (a11830 residents) and was 1.4 percentage points higher than London average of 4.2% § Unemployment rate for ethnic minorities was 17% based on Annual Population Survey results for 2009/10. This was 10.5 percentage points higher than the unemployment rate for white residents (6.5%) and higher than the BME unemployment rate across London (13.6%). However, Lambeth's ethnic minority employment (61%) is higher than the London average (58.1%). |
| Regeneration | <ul style="list-style-type: none"> § A number of regeneration projects current in Borough including Lower Marsh Regeneration Project; Shell Centre site Masterplan Streatham and West Norwood High Streets; Vauxhall Nine Elms / Battersea Opportunity Area; Waterloo Opportunity Area; and Future Lambeth projects: Brixton, Clapham, Kennington, Norwood, Streatham. |

5 What would happen without the Local Plan

- 5.1 The SA is required to look at what the effect on the current conditions would be if there was no Local Plan. In general it is considered that there would be little difference, as there are already policies in place to protect Lambeth in the current Core Strategy and saved UDP policies. However, if there was no Local Plan there would be a risk that policies within these documents may be considered 'out-of-date' under the National Planning Policy Framework (NPPF). In this situation decisions would be made following national and regional policies, which may not always be appropriate for the local context of Lambeth.
- 5.2 For example, as long as development proposals meet the NPPF definition of sustainable development, applications must be approved. This may result in more student housing than desired for the Borough, or loss of employment generating land or lower than desired standards of sustainability of the built form.

5.3 Another issue is that there is an increasing demand for housing and especially affordable and sustainable housing within the Borough. Absence of the Local Plan would not be likely to provide the amount of affordable housing needed in the right locations in the Borough. There are a high proportion of apartments within Lambeth. Different types and sizes of housing are needed and this may not be achieved without the Local Plan.

5.4 In general development agreed without a Local Plan may not fit local needs. For example, the right development may not happen in our town centres and the right services and facilities might not be developed for the expected growth in population.

6 Key sustainability issues

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

Table 3: Summary of key sustainability issues in Lambeth

| Characteristics | Key sustainability issues (summary) |
|--|---|
| <p>Housing</p> <ul style="list-style-type: none"> • Access to good housing. • Affordable housing. • Sustainable housing. • Housing mix and types. | <ul style="list-style-type: none"> • Cost of housing is a major issue. • Shortage of affordable family sized accommodation • Shortages of housing suitable for people with extra care needs, mental health needs, learning disabilities, substance misusers and ex-offenders |
| <p>Employment and Economy</p> <ul style="list-style-type: none"> • Increasing jobs, particularly local jobs for local people. • Addressing high rates of child poverty. • Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups. • Tackling barriers to employment. <p>§ London's role in the UK economy.</p> <p>§ Managing evening economy and food and drink uses</p> <p>§ New business development.</p> <p>§ Business retention.</p> <p>§ Inward investment.</p> <p>§ Targeting key economic sectors.</p> <p>§ School placements</p> | <p>§ Not enough variety of local businesses</p> <p>§ Range of difficulties stopping people find work. Problems include:</p> <ul style="list-style-type: none"> ○ low skill levels and low levels of educational attainment ○ reluctance to take 'low quality' jobs in some cases, ○ difficulty finding suitable work within easy travelling distance ○ difficulty finding affordable childcare ○ a history of offending, substance misuse or mental illness, physical or learning disabilities ○ lack of space to start businesses from home in very high density housing <p>§ The new 'green industries' are a growth sector covering construction, energy and waste management that will bring new jobs opportunities and skills for local people</p> <p>§ The number of school places in the Borough is currently insufficient to meet future demand, both at secondary and primary level.</p> <p>§ There is a need to control the location of new betting offices, pawnbrokers and pay-day lenders. Too many in one area can lead to a negative impact on the vitality and viability of a town centre.</p> <p>§ Evening economy and food and drinks uses bring investment and vitality into areas however, this has also brought some problems in terms of its impact on local residents.</p> <p>§ Pubs are being lost at an alarming rate. Pubs can provide a valuable community asset and are a hub for social interaction. They also have a valuable economic role, contributing to local employment generation.</p> |
| <p>Environment and Climate Change</p> <p>§ Reducing CO2 emissions.</p> | <p>§ Flood risk is a key issue in some parts of the Borough</p> |

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| <ul style="list-style-type: none"> § Climate change adaptation, including flood risk management § Efficient use and management of resources. § Efficient use and management of water: addressing increasing demand. § Efficient use and management of energy. § Efficient management of waste: increasing recycling rates and self sufficiency in waste disposal. § Pressure on biodiversity and open spaces. | <ul style="list-style-type: none"> § A large part of the north of the Borough is located within the highest flood risk zone (level 3a), with the principal risk from tidal flooding of the River Thames. § Additional risk of fluvial flooding close to the river Graveney in the south of the Borough. § Further risks arise across the Borough from sewer and surface water flooding. § Development s need to minimise energy consumption, contribute toward renewable energy production and help improve the environment through sustainable design and construction. § Mixed use development will work to minimise travel to work. § The domestic sector accounts for over half of energy consumption in the borough and gas is the main fuel type (82 per cent of total domestic consumption). § About 26% of Lambeth residents are in fuel poverty. |
| <p>Transport</p> <ul style="list-style-type: none"> § Good local access to services and facilities. § Tackling congestion. § Increase public transport accessibility, cycling and walking. | <ul style="list-style-type: none"> § Public Transport provision in the borough is generally good, with 14 overground railway stations evenly spread throughout the borough and nine underground stations predominantly in the north. § Much of Lambeth’s public transport infrastructure is extremely busy during peak hours. This situation will worsen with increasing living and working populations. § There are many bus routes, with major interchanges at Waterloo, Vauxhall and Brixton. § Public transport accessibility is good in north and central Lambeth. § Residents in Streatham and Norwood are without direct access to the underground and depend on rail and bus connections for their needs. |
| <p>Equalities and Accessibility</p> <ul style="list-style-type: none"> § Mixed communities. § Cohesive communities. § Safe communities. § Accessible communities. § Meeting the needs of diverse communities. § Addressing social inequities. § Tackling crime. § Tackling terrorism. § Addressing fear of crime. | <ul style="list-style-type: none"> § Some communities feel that their neighbourhoods lack stability and that not enough households stay long enough to put down roots and contribute positively to community life. § A number of Lambeth’s neighbourhoods are currently struggling with: <ul style="list-style-type: none"> ○ high levels of ill-health (including mental ill-health), ○ educational under-achievement ○ child poverty, ○ worklessness ○ crime and fear of crime ○ gang-related violence and anti-social behaviour § Community facilities are unevenly spread across the Borough, with some neighbourhoods experiencing big shortages of useable space, while others apparently have too many under-used facilities. § The most deprived areas are spread throughout the Borough but are particularly concentrated in Coldharbour ward, in Brixton, and in the Crown Lane area of Knights Hill ward in the south of the Borough. |
| <p>Health and Well Being</p> <ul style="list-style-type: none"> § Improving air quality (and | <ul style="list-style-type: none"> § Road traffic is the primary cause of air pollution in Lambeth |

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| <p>meeting EU targets).</p> <p>§ Addressing health inequalities and the health needs of Lambeth's existing and new residents.</p> <p>§ Develop healthy communities and help improve and protect the health and well being of residents.'</p> | <p>§ The vehicle emissions of greatest concern are Nitrogen Dioxide, Fine Particulates (PM10), Carbon Monoxide and Volatile Organic Compounds (VOC's) such as Benzene. High levels of any of these pollutants can affect health.</p> <p>§ It is estimated that vehicles in Lambeth emit over 20,000 tonnes of the above pollutants every year. This contributes about 90% of air pollution emissions in Lambeth . In addition vehicles in Lambeth create nearly a quarter of a million tonnes of the greenhouse gas carbon dioxide which contributes to global warming.</p> <p>§ Health facilities need to be able to deliver services to the increasing population.</p> <p>§ Access to leisure and recreation facilities needs to be improved for all residents in the Borough, but particularly for those in more deprived neighbourhoods.</p> <p>§ The health of local residents is a key concern of the Council. The location of hot food takeaway shops near schools is a concern for the Council as it provides easy access for children to access unhealthy food</p> |
| <p>Town centres and Regeneration Viable, safe and well managed town centres:</p> <p>§ Brixton § Streatham § Clapham § Stockwell § West Norwood / Tulse Hill</p> <p>Regeneration of Vauxhall and Waterloo Opportunity Areas.</p> | <ul style="list-style-type: none"> • Regeneration of Waterloo and Vauxhall is expected to maximise use of land, taking account of local residential amenity and other needs. • New shops should support rather than undermine Lambeth's existing town centres, and be in areas of high public transport accessibility. • Maintaining active streets and window displays with an appropriate mix of ground floor uses (shops etc) are also key issues along with the need to maintain and improve the environment, public realm and community safety. • Brixton and Streatham, both have big potential for new commercial and residential development. • Lambeth's local centres and street markets need strong protection given the essential contribution they make to neighbourhoods and communities, to local character and to reducing the need to travel. |
| <p>Open Space and Recreation</p> <p>§ Better use of open space § Biodiversity</p> | <p>§ Some areas, especially in the north of the Borough, have limited access to unrestricted open space.</p> <p>§ The current amount of public open space will probably reduce as a result of more people in the borough.</p> <p>§ Therefore, pressures on open space will become even more intense across the Borough, including burial spaces.</p> <p>§ There is a need to protect and enhance the wide range of habitats and species that contribute to the Borough's biodiversity.</p> |
| <p>The Built Environment</p> <p>§ Location of tall buildings § Built heritage</p> | <p>§ The Borough has a highly valued historic environment, including values views which must continue to be protected and enhanced.</p> |
| <p>Infrastructure</p> <p>§ Infrastructure provision, including healthcare services and facilities; and schools</p> | <p>§ Lambeth's future housing growth, economic development and environmental sustainability cannot be achieved without a wide range of essential infrastructure.</p> <p>§ Some areas of infrastructure provision are extra important over the next 15 years because they are already under much pressure ,for example public transport school places, health and social care services, open space, facilities for policing the Borough and waste facilities.</p> |

7. Sustainability Appraisal Framework

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

Table 4: Revised Sustainability Objectives and SEA Topic Requirement

| | SA Objective | SEA Topic Requirement |
|----|---|--|
| 1 | Crime and safety. Ensuring safe communities with reduced crime and disorder. | Population |
| 2 | Health and well being. Promoting a healthy borough with better health care services, reduced health inequalities and by reducing the causes of ill health. | Population, Human Health |
| 3 | Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities. | Population, Human Health |
| 4 | Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands. | Population, Human Health, Material Assets |
| 5 | Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion. | Population, Human Health |
| 6 | Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity. | Population, Human Health, Material Assets |
| 7 | Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles and a sense of place. | Population, Human Health, Material Assets, Landscape, Cultural Heritage |
| 8 | Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and historic assets. ¹ | Landscape, Cultural Heritage (including architectural and archaeological heritage) |
| 9 | Transport and travel. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport. | Population |
| 10 | Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people. | Biodiversity, Flora, Fauna, Landscape, Soil, Water |
| 11 | Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change. | Climatic Factors, Materials Assets |
| 12 | Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk. | Water, Climatic Factors |
| 13 | Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates. | Population, Material Assets |
| 14 | Air quality. To improve air quality. | Air |
| 15 | Education and skills. To maximise the education and skills levels of the population. | Population, Material Assets, Human Health |
| 16 | Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses. | Population, Material Assets |
| 17 | Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings. | Material Assets, Soil |
| 18 | Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment. | Population, Material Assets |

8 Sustainability Appraisal Findings

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

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

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

The strategic objectives and Core Strategy policy should also target the regeneration of London Plan Areas of Regeneration.' (SA Core Strategy 2009).

Effects of Local Plan policies and site allocations on SA Objectives

8.2 First, it is considered important to point out that the level of growth proposed for the borough is required by the London Plan. The London Plan, in its preparation, was itself subject to SA in 2009– called in this case Integrated Impact Assessment (IIA). Overall, this document concluded that 'the assessment of the draft replacement London Plan has found it to be broadly positive when considered against the IIA objectives'.

8.3 The effects of the Local Plan on individual SA objectives are outlined below in Table 7. On the whole it is considered that the Local Plan policies have been produced with the premise of sustainability actively borne in mind. Sites earmarked for future comprehensive redevelopment are in locations that facilitate efficient accessibility to both areas within and outside of the Borough. The Local Plan aims to achieve high standards in the quality of development and contains many policies that seek to reduce or avoid adverse effects on the natural environment. Generally, the SA found that the Local Plan policies seek to achieve significant positive social and economic effects and avoid or reduce the effect of (mitigate) significant negative effects. It found that the scale, type and level of development proposed in the Local Plan will not give rise to significant negative effects on biodiversity, landscape, historic environment and natural resources. This is because of the protective nature of policies in the Plan. It is recognised that there will be increases in carbon emissions and water use associated with increased population growth, but policies which have been included in the Local Plan may mitigate these. The SA was not able to be definite about this because of uncertainties about the effects of these mitigation policies, which are discussed further below.

8.4 Uncertainties were mainly about whether housing and transport and social services and facilities would be built, and how successful environmental policies would be. Another issue is that it was not clear what effect controlling A2 uses (e.g. pawn brokers, money lenders, estate agents, betting shops) would have on the local economy.

8.5 Environmental issues which the SA could not be certain about were:

- whether higher environmental standards for new housing will be achieved (higher Code for Sustainable Home and BREEAM standards) as the policy

suggests such standards are only required “unless it is not technically feasible or viable to do so”;

- whether living roofs and walls will be included in all new development;
- how far carbon emissions will be reduced in the Borough;
- how strong the requirements for water efficiency measures in new development will be; and
- whether air quality will be significantly improved.

8.6 Another issue that the SA could not be certain about was how much of the new housing and supporting facilities and services will be delivered. This is considered to be a key issue for the Local Plan. For example, in the year 2011/12 the housing target was missed by 347 residential units and there were 2150 planning permissions for residential units not used / built out. Also, the Local Plan has a heavy reliance on new public transport servicing the Nine Elms Vauxhall Opportunity Area. An extension to the Northern Line is planned but it is highly unlikely it will be delivered before developments in the area are completed and occupied. Significant growth in the borough will place added pressure to public transport infrastructure which is already running at overcapacity in many areas, with funding not yet secured to help reduce such pressures. In the same way, funding for much needed healthcare and new school places has not yet been agreed.

SA Recommendations

8.7 Recommendations have been made in this SA with the aim of improving the impact of policies on sustainability or mitigating potential for negative effects. In brief, some of the main recommendations concern the following areas:

Table 5: Recommendations made and how they have been dealt with in the Local Plan

| SA Recommendation | Council Council response |
|--|---|
| Ensuring external amenity space for new dwelling is <i>private</i> | Accepted – policy amended |
| Planning applications should not be supported where transport impacts result in adverse air quality, noise and disturbance | Noted – policy Q2 applies |
| Public health as a consideration for refuse and recycling storage areas | Accepted – policy amended |
| Not allow flood defences to get to ‘poor condition’ | Accepted – policy amended |
| Expectation that family housing is provided in housing proposals (removes word ‘normally’) | Accepted – policy amended |
| Allow residential above ground floor units, rather than just above shops | Accepted – policy amended |
| Effects of servicing sites should be managed for amenity of adjacent properties rather than only adjoining properties | Accepted – policy amended |
| Effects of new taxi ranks should be managed for the wider environment amenity, rather than only residential amenity | Accepted – policy amended |
| Flexibility to seek higher standards of sustainable design and construction in later stages of plan period | Accepted – policy amended |
| Redress potential inconsistency between Conservation Areas and Brixton policy in terms of protecting historic frontages | Accepted – policy amended |
| Encourage electric vehicles and charging points network across borough | Accepted – text amended |
| Ensure developments have capacity for adequate <i>water supply</i> as well as sewerage water capacity | Accepted – policy amended |
| On site waste management facilities provided for all developments | Noted, definition of waste management facilities amended for more clarified policy position |
| Guidance on climate change mitigation and adaptation for historic assets | Noted – for forthcoming SPD |
| Clarification on when tall building policy would apply | Noted – guidance provided in supporting text. |

- 8.8 The Sustainability Appraisal has scored the sustainability effects of the Local Plan using the symbols shown in Table 6. Table 7 presents the final likely effects of the plan taking into account SA recommendations.

Table 6: Key symbols used in the appraisal

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

Considering alternative ways of delivering Local Plan objectives

- 8.9 The development of the Core Strategy and then the Local Plan has involved a process of considering different ways of achieving the Plan's objectives. These are called alternatives. Alternatives were first considered for the whole Plan (called strategic alternatives) and then for individual policies (called policy alternatives).
- 8.10 The SA is required to consider the effect of different alternatives on the sustainability objectives. Appraisal of the strategic alternatives and of many of the policy alternatives was done in the SA of the Core Strategy. The SA of the Core Strategy can be viewed online as Appendix 7 at <http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/LocalPlan/SustainabilityAppraisalForThePlanningPolicyEvidenceBase.htm>
- 8.11 Where Local Plan policies are different from those appraised before, alternatives have been considered and appraised for these new policies. These broadly include the following areas: affordable housing, housing mix, student housing, KIBAs, business uses outside KIBAs, railway arches, town centres, evening economy and food and drinks uses, A2 uses, hot food takeaways near schools, skills and training, schools, food growing spaces, and waste management. The SA on the Draft Local Plan appraised the reasonable alternatives identified for these areas, and a summary of SA analysis of reasonable alternatives is provided in Appendix 5 of main SA Report. The outcomes of the SA work, together with consultation feedback have fed in to the Lambeth Local Plan Proposed Submission November 2013. Some key changes to policy approach resulting from this process include different retail capacities and different food and drink uses specific for each town centre (recognising the spatial variations of these uses across the borough) and controlling hot food takeaways near schools even within town centres.

9 Designated sites, including European Nature Conservation sites

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

9.2 It is considered that the Designated Sites of Nature Conservation Importance of Metropolitan, Borough and Local Importance are well protected for by policies in the Local Plan.

10 **Technical difficulties/data limitations**

10.1 The Sustainability Appraisal process provides a useful tool in identifying issues and suggesting possible forms of mitigation. It tests the performance and robustness of policies against the Council's sustainability objectives. However, there are a number of uncertainties and limitations that exist in the sustainability appraisal process, which are summarised below:

- § The principal source of difficulty undertaking the SA is the reliance on the judgement of predicting and assessing effects. However, the SA has been undertaken by a professional with more than 10 years experience in town planning and sustainability issues. In addition the consultants who prepared the SA on the Lambeth Core Strategy provided guidance on the process used. Consultation on the SA report also added value to the process through the views of other 'experts' and interested stakeholders to review the effects identified and provide alternative opinions for further scrutiny.
- § Difficulties have been experienced in predicting the impact of the Local Plan in the long term (for example global market uncertainty). This had made it difficult to accurately appraise the sustainability of the policies.
- § Difficulties associated with and distinguishing the influence of the Local Plan and separating it from other external factors. For example whilst specific local conditions such as air quality, carbon emissions or health or education statistics may be getting worse, this may be due to various factors beyond the control of the Local Plan, and the Local Plan itself may still have a positive influence in so far as planning can influence such areas.
- § A further difficulty was deciding how *significant* the effects of the Local Plan are. This is particularly true for sustainability objectives such as health which are influenced by a wide range of factors.

11 **Conclusion**

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

Table 7: Summary of SA findings

| Score | Timescale | Probability | Permanent or temporary | Indicators to monitor significant and uncertain effects |
|--|---|--|---|--|
| 1. Ensuring safe communities with reduced crime and disorder | | | | |
| ++ | Medium term | Likely | Permanent | <ul style="list-style-type: none"> § Percentage of proposals directly incorporating 'Secured by Design', 'Designing Out Crime' and 'Safer Places' principles or receiving Secure by Design accreditation § Recorded crimes per 1,000 households § Resident surveys on perception of crime and level of safety in town centres § Resident surveys on perception of crime and level of safety in public open spaces. |
| 2. Promoting a healthy borough with better healthcare services, reduced health inequalities and by reducing the causes of ill health | | | | |
| ++ | Medium to long term | Likely | Permanent | <ul style="list-style-type: none"> § Annually Updated Infrastructure Schedule § Life expectancy § Deaths from heart disease less than 75 years § Amount of unrestricted open space per 1000 population § Percentage of dwellings achieving Code for Sustainable Homes level 4 or higher and non-residential buildings achieving BREEAM Excellent § Percentage of homelessness in the Borough § Provision of childcare places per 1000 under 5's § New child play spaces created in completed residential developments § Child obesity levels. § Parks with Green Flag Awards |
| 3. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities | | | | |
| ++/? | Public realm improvements – medium term Large scale transport improvements – long term | Likely Funding for public transport capacity improvements uncertain at this stage | Permanent | <ul style="list-style-type: none"> § Index of Multiple Deprivation § Average distance of households and bus stations to health/medical centres § Proximity of new housing developments to services, facilities and employment § Improvement in unrestricted open space per 1000 population § Number of private vehicles owned by residents in the Borough § Gross additional wheelchair accessible homes § Updated Infrastructure Schedule § Walking mode share based on all trips originating within Lambeth - target 32% by 2026 § Cycling mode share based on all trips originating within Lambeth - target 8% by 2026 |
| 4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands | | | | |
| ? | Medium to long term | Likely although some infrastructure (school places, healthcare, transport) is uncertain at this time | Permanent with temporary effects until such infrastructure is delivered. Also temporary | <ul style="list-style-type: none"> § Annual update of Infrastructure Programmes Schedule |

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| | | | | |
|--|--|--|---|---|
| | | | construction effects | |
| 5. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion | | | | |
| +/? | Infrastructure to support growth – long term; otherwise short - medium term | Transport is uncertain, otherwise achievement is likely | Permanent | § Annual update of infrastructure programmes schedule. |
| 6. Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity | | | | |
| ++/? | Mid- Long term | Likely although delivery of housing in current economic climate / recent trends is uncertain in the short-term | Permanent Temporary construction effects | § Number of new dwellings permitted § Number of new dwellings completed each year § Number of new affordable dwellings built each year |
| 7. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place | | | | |
| ++/? | Mid–Long term | Likely | Permanent | § Diversity of resident ethnicity § Resident surveys on satisfaction parks and open spaces § Resident surveys on perception of crime and level of safety in public § Level of population churn § Annual update of Infrastructure Schedule |
| 8. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets | | | | |
| ++/? | Historic and open spaces environments – short term and continuing; redevelopment / public realm medium to long-term as developments complete | Likely | Permanent | § The number of buildings on the English Heritage Listed Buildings at Risk Register and the risk levels § Number of listed buildings within the Borough § Number of registered parks and gardens § Number of conservation areas with up to date character appraisals § Number of approved Archaeological Assessment Statements § Annual update Infrastructure Schedule |
| 9. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport | | | | |
| ++/? | Walking and cycling short – long term; major transport infrastructure long-term | Likely but funding for some major transport infrastructure projects currently uncertain / not secured | Permanent Temporary effects associated with construction | § Mode of travel, particularly commute to and from work § Number of people who work locally § Walking mode share based on all trips originating within Lambeth - target 32% by 2026 § Cycling mode share based on all trips originating within Lambeth - target 8% by 2026 § Annual update of Infrastructure Schedule |
| 10. To conserve and enhance biodiversity and to bring nature closer to people | | | | |
| ++ | Short-term and | Likely | Permanent; and | § Percentage of development planning approvals that have incorporated new |

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| | | | | |
|---|---|--|---|---|
| | enhancements short-medium term | | temporary construction effects | <p>biodiverse open space</p> <p>§ Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls)</p> <p>§ The achievement of BAP targets</p> <p>§ The change in area and condition of BAP habitats/species</p> <p>§ The change in area and percentage in positive conservation management of Sites of Importance for Nature Conservation</p> <p>§ Percentage of population located in an access to nature deficiency area.</p> |
| 11. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change. | | | | |
| +/? | Long term | Dependent on delivery of transport infrastructure, district heating networks and viability of sustainability measures in built environment | Temporary construction effects; otherwise permanent | <p>§ Number of buildings built to Code for Sustainable Homes Level 4 and BREEAM excellent or higher</p> <p>§ Number of district heating networks in the Borough and dwellings / premises linked to them.</p> |
| 12. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk | | | | |
| +/? | Medium to long-term | Dependent on viability in implementing water efficiency measures; reducing flood risk is uncertain given high levels of development | Permanent | <p>§ Number of developments which have had Surface Water Flood Risk Assessments approved by the Environment Agency and incorporate sustainable urban drainage systems</p> <p>§ Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality issues.</p> |
| 13. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing reuse, recycling, remanufacturing and recovery rates | | | | |
| +/? | Long-term in terms of funding and identifying and occupying new sites; short – medium term with regards to bring vacant buildings back in use | Uncertainty on funding for recycling and reuse centre and meeting London Plan apportionment targets. | Temporary construction waste; otherwise permanent in management facilities once delivered, building back in use | <p>§ Annual update of Infrastructure Schedule</p> <p>§ Capacity of new waste management facilities</p> <p>§ Amount of municipal waste arising and managed by management type</p> |
| 14. To improve air quality | | | | |
| +/? | Localised efforts to improve air quality – medium term Transport infrastructure delivery and Vauxhall gyratory remodelling – long | Likely – localised improvements Uncertainty on delivery of new transport infrastructure and improved air quality given previous efforts | Permanent with ongoing management; and temporary with regards to construction effects | <p>§ Percentage of residents with health problems related to air pollution/quality</p> <p>§ Improvement of air quality at the monitoring stations around the Borough</p> <p>§ Annual update of Infrastructure Schedule</p> |

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

1. INTRODUCTION

Producing the Lambeth Local Plan

- 1.1 Lambeth Council has prepared a new Local Plan for Pre-Submission Publication. This Local Plan incorporates into one document Core Strategy policy, Development Management Policies and Site Allocations. Work on Lambeth's Local Plan began in January 2008. The first Core Strategy for Lambeth was adopted in January 2011 and this sets out the spatial planning strategy for the Borough. In preparing this document, some other work commenced to bring forward separate development management and site allocation documents to sit alongside the Core Strategy. This included some associated Sustainability Appraisal work of these separate DPDs. However as the production of separate documents is no longer a requirement in national policy, it was considered more effective, efficient and user-friendly to integrate Lambeth planning policy into one document. This decision was agreed by Council Cabinet in February 2013.
- 1.2 Various factors have since highlighted a need for review of the Core Strategy, including the National Planning Policy Framework 2012 and current development pressures. Accordingly elements of the Core Strategy have been reviewed and development management policies as well as site allocations have been incorporated to provide an up-to-date streamlined development plan for the Borough. The over-arching vision, strategic objectives and spatial strategy set out in the Core Strategy 2011 have not undergone review as part of preparing the new Local Plan, as they are recently developed and adopted by the Council and remain valid (subject to factual updating). Only a limited number of areas of strategic policy will undergo a review of approach, but all aspects of the plan will be updated as required to reflect factual changes. In addition, many areas of strategic policy are supplemented by further policy guidance in the form of detailed development management policies and/or site allocations, to replace the remaining saved UDP policies. Appendix 1 sets out an analysis of the existing sections of the Core Strategy and identifies which have been the subject of a review of approach, updating and/or further policy guidance in the new Local Plan.
- 1.3 Extensive revisions have been made to the Draft Local Plan to take account of the many views expressed at workshops and in writing, as well as the recommendations of the sustainability appraisal (including equalities and health and well-being impact assessments).
- 1.4 Once adopted, the Lambeth Local Plan will replace the Core Strategy and saved policies of the Lambeth Unitary Development Plan (UDP) in setting out the policies and proposals to guide future growth and development of the Borough.

Sustainability Appraisal

- 1.5 Section 39 of the Planning and Compulsory Purchase Act 2004 requires local authorities to undertake a Sustainability Appraisal (SA) for Development Plan Documents and Supplementary Planning Documents. The EU Directive 2001/42/EC requires the Strategic Environment Assessment (SEA) of the *environmental* effects of certain plans and programmes on the environment. The SA extends the reach of the SEA to incorporate *economic* and *social* issues relevant to the plan or programme. Therefore, this report assesses the environmental, social and economic effects of the new Local Plan.
- 1.6 Government guidance has defined Sustainability Appraisal as:
- "...A systematic and iterative appraisal process, incorporating the requirements of the Strategic Environment Assessment Directive. The main purpose of Sustainability Appraisal is to appraise the social, environmental and economic effects of plans, strategies and policies, from the outset of the preparation process, so that decisions can be made that accord with the objectives of sustainable development."* (Office for the Deputy Prime Minister, 2005).
- 1.7 This report follows a series of previous iterations of SA in developing the Local Plan. The adopted

Core Strategy was subjected to SA during its preparation. This was submitted with the Core Strategy to the Secretary of State and an SA Adoption Statement was prepared upon adoption of the Core Strategy by the Council. The lead up to this included a draft SA Report in April 2009 which was published for consultation alongside the draft Core Strategy. Previous to this an Initial SA was completed in December 2008. That appraisal assessed each Option put forward in the Core Strategy Issues and Options document against the sustainability objectives established through the preparation of the Scoping Report (October 2008), otherwise known as the Sustainability Appraisal Framework. A further Scoping Report was prepared in March 2009 for the Lambeth Core Strategy, Site Allocations and Development Management DPDs. This was later revised in September 2010 and consultation was undertaken in November 2010, responses of which informed the SA published in February 2013 on the Draft Local Plan. The latest iteration of SA provided 176 recommendations to the Local Plan. All recommendations have been carefully considered and responded to by the Council (see Appendix 2) and many have been incorporated in the Lambeth Local Plan Proposed Submission November 2013.

1.8 A SA is the systematic process undertaken during the preparation phases of a plan or strategy. The process tests the overall plan, including each policy against the sustainability objectives that have been agreed for this purpose. The purpose of the SA is to inform the decision making process, by highlighting the potential implications of pursuing a particular strategy or policy response. Therefore, the final version of the Local Plan represents a more sustainable policy approach to development in the borough.

1.9 The overall aim of the appraisal process is to help ensure that the Lambeth Local Plan makes an effective contribution to the pursuit of 'sustainable development', which is widely defined as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs' (World Commission on Environment and Development, 1987). The UK Government Sustainable Development Strategy (2005) describes the UK Government's position on sustainable development. The Report details the following five guiding principles to help achieve sustainable development:

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

1.10 More recently, the National Planning Policy Framework 2012 constitutes the Government's view of what sustainable development in England means in practice for the planning system (policies

within paragraphs 18 to 219). It covers three dimensions: economic role, social role and environmental role.

Objectives and Structure of the SA Report

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

Section 1 has provided background information on the preparation of the Local Plan, the purpose of an SA Report and the supporting legislative requirements.

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

Section 3 – SA/SEA Methodology describes the SA process including the SEA requirements, consultation conducted, the SA objectives used to appraise the Local Plan, and the difficulties encountered.

Section 4 – Characterisation and SA framework provides an overview of the character of Lambeth Borough and describes the process for developing the SA framework against which the Local Plan has been assessed.

Section 5 – Appraisal of the Local Plan is the most noteworthy section of this report. Despite no changes proposed for the Plan objectives (considered up-to-date given adoption in 2011), and that the objectives have already been appraised in the SA on the Core Strategy; for totality the objectives have again been assessed for compatibility against the SA objectives set out in the framework section. Following this, Local Plan policies as a whole is assessed against each SA objective. The assessment involves consideration of the following:

- § National, regional, and local level guidance and policy;
- § Baseline conditions, existing issues, and likely evolution without the Plan;
- § Likely significant effects of implementing the Local Plan policies and site allocations as a whole, taking into account mitigation; and
- § Recommendations for monitoring significant and uncertain effects.

Section 6 – Summary and Conclusions provides a summary of the Local Plan, the predicted significant sustainability effects, and an overview concluding analysis of the main issues of concern in the Local Plan.

Equality Impact Assessment

- 1.12 It is also important that the SA adequately addresses equality and diversity issues. The Council has an adopted approach to undertaking Equality Impact Assessments (EqIA) and this SA seeks to integrate the principles of the EqIA across the SA Framework. This helps to explore the impact of the proposed policy/option/site allocation on the 12 different equalities groups, (i.e. race, age, gender, gender re-assignment, sexual orientation, religion and belief, socio-economic, disabilities, language, health, marriage and civil partnership, pregnancy and maternity, lesbian/gay/bisexual/transgender, age, faith communities). For example, whilst SA Objective 5 specifically addresses issues of equality and diversity, other objectives also tease out equality impacts via appropriate sub questions.

- 1.13 An EqIA report was prepared and presented to the Council's Equalities Panel on both the proposed Consultation Plan for draft Local Plan consultation; and the Local Plan itself. Recommendations identified through this equalities assessment process, as well as feedback from the Panel itself have fed into the Lambeth Local Plan Proposed Submission November 2013.

Health and Well-being Impact

- 1.14 As with the EqIA, the Health and Well-being Impact Assessment is integrated into the SA and this approach was discussed and agreed with Lambeth and Southwark Public Health Directorate. In

addition, Lambeth and Southwark Public Health Directorate has been involved in the preparation of the SA by providing current health statistics for the Borough and up-to-date guidance and documents on public health. They were also engaged in the preparation of the Draft Local Plan February 2013 and comments made in their representation on the SA have been taken into account in this SA Report.

Habitat Regulations Assessment

- 1.15 The Council has undertaken a Habitat Regulations Assessment – Screening Analysis on the Local Plan as required under European legislation. No European Sites lie wholly or partly within Lambeth Borough. Four European Sites (Wimbledon Common SAC, Richmond Park SAC, Walthamstow Reservoirs and Epping Forest (extreme southern tip only) lie partially within 15 kilometres of the Lambeth Borough boundary. The screening assessment on the Draft Local Plan did not identify any likely significant adverse effects on any European Site. Similarly it was considered that the Draft Local Plan would not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage is not required on the Local Plan.
- 1.16 In their representation, Natural England agreed ‘with conclusions of the HRA Screening Analysis that they are no likely significant effects of the Lambeth Local Plan on Natura 2000 sites’ (Natural England, 2013).

2. LAMBETH LOCAL PLAN

2.1 The procedure for preparation and review of Local Plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. In March 2012, the coalition government published the National Planning Policy Framework (NPPF) which replaces almost all existing national planning policy and guidance. The Local Development Framework (LDF) system remains, but the emphasis in the NPPF is now on each local planning authority (LPA) producing an up-to-date Local Plan for its area. This can comprise existing adopted development plan documents under the LDF system, or can involve the production of a new Local Plan document, depending on the local context. Documents comprising Lambeth's Local Development Documents include:

- § Local Plan
- § Proposals Map;
- § Supplementary Planning Documents;
- § Local Development Scheme;
- § Statement of Community Involvement; and
- § Authority Monitoring Report.

2.2 The Local Plan is the primary planning document. It is the foundation Development Plan Document (DPD) with which all other DPDs and Supplementary Planning Documents (SPDs) must be in general conformity. The Core Strategy was the first document the Council produced (adopted in 2011) and to it the Council has now added the development management policies and site allocations, to produce the new Local Plan. This has the benefit of showing the totality of the policies being proposed (apart from Gypsies and Traveller DPD).

2.3 There is a new requirement in national planning policy issued in March 2012 to identify and update annually a five year supply of specific deliverable sites for travellers against locally set targets. The locally set targets should be based on a robust evidence base to establish accommodation needs. Evidence of need for traveller accommodation in Lambeth requires updating, as the most recent information dates from 2008. Therefore, it is proposed that new work to assess need be undertaken and that the requirements of national policy on this issue be addressed in a separate development plan document (DPD) on gypsies and travellers. The preparation of this DPD would follow a timetable approximately six months later than the draft Local Plan, as set out in the Local Development Scheme.





















2.4 The Council has taken this opportunity to partially review elements of the Core Strategy. Appendix 1 illustrates that most sections of the Core Strategy are not subject to a review of approach in the development of the new Local Plan. Accordingly, previous SA analysis, including reasonable alternatives on the spatial strategy, spatial vision, strategic objectives and most strategic policies remains relevant (see Sustainability Appraisal and SEA of London Borough of Lambeth Submission Core Strategy 2009). There has been factual updating of the strategy, vision, objectives and some policies; however the nature of this is not such that it fundamentally impacts on the policy approach or previous SA / SEA conclusions. The following strategic policies have been subject to a review of approach since the adoption of the Core Strategy 2011:

- § Affordable housing
- § Gypsies and travellers
- § Student housing
- § KIBAs
- § Loss of B class use outside KIBAs
- § Retail capacity
- § Management of town centre uses
- § Schools on employment land
- § Sustainable design and construction (includes targets)
- § Vauxhall

- § Brixton
- § Loughborough Junction
- § Upper Norwood

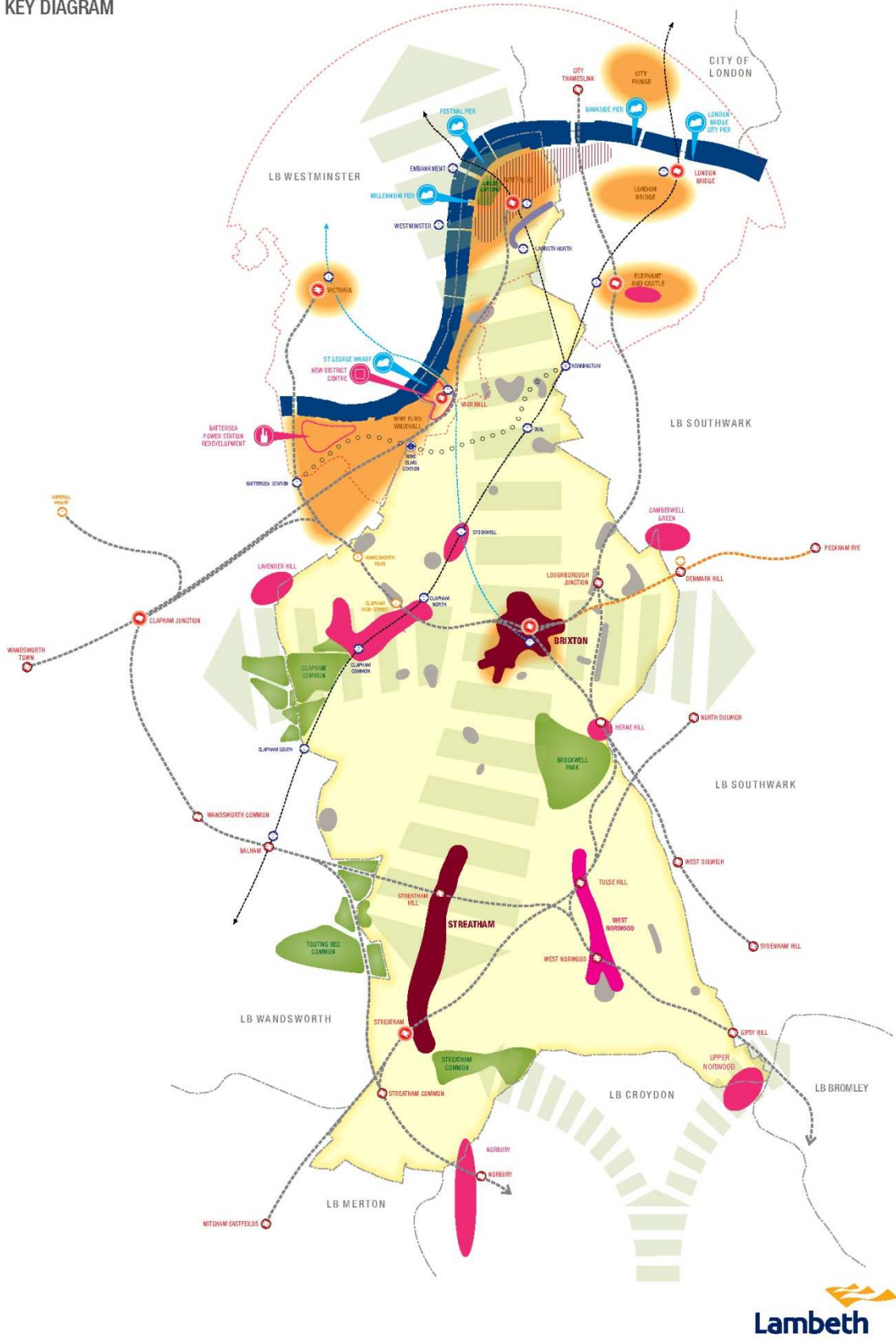
- 2.5 Like all DPDs, the Local Plan is a statutory document and will be subject to examination by an independent Inspector. Of particular relevance is the need for the Local Plan to be in general conformity with the London Plan.
- 2.6 The Local Plan sets out the spatial strategy, long term spatial vision, strategic objectives and policies for development, and identifies sites for development within Lambeth to cover the period up until 2030. It is based on the outcomes of the Lambeth Community Plan 2013-16 together with other relevant plans, programmes and strategies for development and land use within the Borough.
- 2.7 The spatial framework for future development and land use within the Borough is outlined in the spatial strategy and show in Map 1 below – the Local Plan Key Diagram. It sets out the broad locations for delivering sustainable development and enhancement, including new housing and other important strategic development needs such as employment, retail, leisure, community, public services, transport as well as mitigating and adapting to the effects of climate change.

KEY DIAGRAM LEGEND

| KEY | |
|---|---|
|  | London Borough of Lambeth |
|  | Rail |
|  | London Overground |
|  | Rail Station |
|  | London Underground Station |
|  | London Overground Station |
|  | Major Transport Hub |
|  | Northern Line |
|  | Victoria Line |
|  | Proposed Northern Line Extension |
|  | Riverboat Service |
|  | Potential for Improved Transport Connectivity |
|  | Central Activities Zone (CAZ) |
|  | Major Town Centre |
|  | District Town Centre |
|  | Growth Area |
|  | Lower Marsh/The Cut CAZ Frontage |
|  | Key Industrial Business Area |
|  | South Bank/Bankside Strategic Cultural Area |
|  | Metropolitan Open Land |



KEY DIAGRAM



3. SA/SEA METHODOLOGY

- 3.1 This report presents the sustainability appraisal work on the Lambeth Local Plan. It incorporates previous appraisal work on the vision, objectives, spatial strategy and describes the results of this SA on the amended Core Strategy policies, new development management policies and site allocations proposed by the Council in the Local Plan. This process will assist in determining the impact the Local Plan is likely to have on baseline sustainability issues in the Borough.
- 3.2 The purpose of the SA is not to identify the best option. It is to inform the decision making process, by highlighting the potential implications of pursuing a particular strategy or policy response. Therefore, the findings of this SA are feeding into the Lambeth Local Plan Proposed Submission November 2013 thereby making an effective contribution to the provision of 'sustainable development'.
- 3.3 This report is the 'Sustainability Appraisal Report' for the purposes of the Town and Country Planning (Local Planning) (England) Regulations 2012 and is one of the submission documents under Regulations 17 and 22. It will be published alongside the Lambeth Local Plan Proposed Submission for eight weeks during December 2013 and January 2014; and it will be submitted to the Secretary of State in March 2014 along with the Local Plan and any representations made at pre-submission publication. It will then be considered by the examining Inspector alongside the other submission documents.
- 3.4 Table 1 below outlines the process of producing a SA report. All of Stage A (Scoping Report October 2008 with later revisions in March 2009 and September 2010) and Stages B, C and D have been completed previously for the Draft Local Plan. This SA Report produces final documents for Stage D Pre-Submission Publication as it takes into consideration any changes made to the Local Plan as a result of the consultation process.

Table 1: SA process and outputs

| STAGES OF THE SA REPORT | Outcome |
|---|--|
| <p>SA Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> § Task A1: Identifying other relevant policies, plans and programmes and sustainability objectives § Task A2: Collecting baseline information § Task A3: Identifying sustainability information § Task A4: Developing the SA framework § Task A5: Consulting on the scope of the SA | <p>Scoping Report (October 2008 and later revisions March 2009 and September 2010)</p> |
| <p>SA Stage B: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> § Task B1: Testing the Local Plan objectives against the SA framework § Task B2: Developing the Local Plan options § Task B3: Predicting the effects of the Local Plan § Task B4: Evaluating the effects of the Local Plan § Task B5: Considering ways of mitigating adverse effects and maximising beneficial effects § Task B6: Proposing measures to monitor the significant effects of implementing the Local Plan | <p>SA and SEA of London Borough of Lambeth Submission Core Strategy (August 2009)</p> <p>Draft SA & SEA on Development Management Development Plan Document January 2011 (internal purposes only)</p> <p>Draft SA and SEA on Site Allocations DPD January 2011 (internal purposes only)</p> <p>Sustainability Appraisal Report on Draft Local Plan (February 2013)</p> |
| <p>SA Stage C: Preparing the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> § Task C1: Preparing the SA Report | <p>Sustainability Appraisal Lambeth Local Plan Pre submission publication (October 2013)</p> |

| | |
|--|---|
| <p>SA Stage D: Consulting on the reasonable alternatives of the DPD and SA Report</p> <p>§ Task D1: Public participation on the preferred options of the DPD and the SA Report</p> <p>§ Task D2: Appraising significant changes including those resulting from representations</p> <p>§ Task D3: Making decisions and providing information</p> | <p>SA and SEA of London Borough of Lambeth Submission Core Strategy (August 2009)</p> <p>SA draft Local Plan (February 2013)</p> <p>SA Lambeth Local Plan Pre submission publication (October 2013)</p> |
| <p>SA Stage E: Monitoring the significant effects of implementing the DPD</p> <p>§ Task E1: Finalising aims and methods for monitoring</p> <p>§ Task E2: Responding to adverse effects</p> | <p>LDF Annual Monitoring Report</p> |

Relationship to Strategic Environmental Assessment

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

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

| Environmental Report requirements | Section of this Report |
|--|---|
| a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes; | Sections 2, 5* and Scoping Report 2010 (see Appendix 3) |
| b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme; | Section 5* |
| c) the environmental characteristics of areas likely to be significantly affected; | Section 5* |
| d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (The Habitats Directive); | Section 5* |
| e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation; | Section 5* |
| f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors; | Section 5* |
| g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme; | Section 5* |
| h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information; | Section 5* |

| | |
|---|--|
| i) a description of the measures envisaged concerning monitoring in accordance with Article 10; | Section 5* |
| j) a non-technical summary of the information provided under the above headings. | Non-technical Summary (separate report) |

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

Consultation and Approach and Influence of SA to date

- 3.8 The first Scoping Report was published for consultation over a five-week period from early November 2008 and provided a summary of the current environmental, social and economic conditions in Lambeth. This baseline information of the Scoping Report assisted in the development of the Sustainability Appraisal Framework. Responses from consultation were taken into account in updating the final version Scoping Report which was published in March 2009.
- 3.9 In December 2008 a sustainability appraisal was prepared for the Lambeth Core Strategy Issues and Options Report (London Borough of Lambeth, *Preparing the Lambeth Local Development Framework Have Your Say - April 2008 – Core Strategy Issues and Options*). The SA assessed each Option of the Core Strategy Issues and Options document against the sustainability objectives established through the preparation of the Scoping Report. The main environmental, social and economic implications of each Option were identified. This initial SA highlighted that not all policy options deliver environmental, social and economic benefits that are equal to one another, and that the true sustainability of each policy option is highly dependent on how the policy is implemented.
- 3.10 In March 2009 a Sustainability Appraisal was carried out on the draft Core Strategy which made 60 recommendations to the Council for consideration into the Core Strategy. Positively, many of the recommendations were incorporated into the Submission Version Core Strategy, demonstrating the meaningful influence the SA has had on plan preparation in Lambeth.
- 3.11 In August 2009 an SA Report on the Submission Core Strategy was prepared following consultation in April and May 2009 on the draft Core Strategy and its accompanying SA. Recommendations made in this SA generally fell into two categories:
- identification of issues within policies that were considered to be addressed in other policies; or
 - identification of issues that will be helpful in the preparation of the Development Management policies or relevant SPD.
- The August 2009 SA Report was submitted with the Submission Version Core Strategy which was adopted in January 2011.
- 3.12 The Scoping Report March 2009 was updated in September 2010 in preparation of producing other future policy documents, in particular development management policies and site allocations (see section 1 on producing the Lambeth Local Plan for explanation). The Sustainability Framework was reviewed at this time and was broadly found to remain relevant for development management policies however; it was considered that the Framework should be adapted for appraising the site allocations. Accordingly a different framework (modified significance criteria) was prepared for the appraisal of the site allocations. There were also some amendments to sub questions and targets to reflect stakeholder views and updated Mayoral targets.
- 3.13 A joint consultation exercise was carried out on the SA scoping report for the development management and site allocations in October and November 2010. Consultation responses were received from the following organisations:
- English Heritage;

- Environment Agency;
- Lambeth Primary Care Trust;
- Coal Authority;
- Highways Agency;
- Lambeth Council ecologist; and
- Lambeth police/community safety

- 3.14 Appendix 3 sets out the responses that were received and the action that has been taken as a result.
- 3.15 Baseline data and other relevant plans and programmes of the Scoping Report 2010 has been reviewed and updated in the preparation of this SA. A letter was sent to statutory consultees in August 2012 advising them of the Council's approach to preparing the new Local Plan and the process proposed for SA and revision of the Scoping Report (see Appendix 3 Updated Scoping Report 2012). The Council received no objections or other comments on this proposed approach.
- 3.16 A SA on the Draft Local Plan was published in early March 2013 for consultation alongside the draft Local Plan. Four representations received mention the SA (Natural England, Environment Agency, English Heritage and Lambeth and Southwark Public Health Directorate) and where appropriate these comments have been incorporated into this SA for Pre-submission Publication (see Appendix 4). The SA prepared on the Draft Local Plan made 176 recommendations for policies and site allocations and all of these have been considered in the preparation of the Lambeth Local Plan Proposed Submission November 2013.
- 3.17 This Sustainability Appraisal of the Local Plan has been carried out 'in house' by an individual with more than 10 years experience in town planning and sustainability issues, employed to prepare the SA and Habitat Regulations Assessment. For reasons of impartiality and independence it was considered appropriate for someone outside of the plan making process to undertake the SA. The consultants who prepared the SA on the Core Strategy have also provided a light touch critical friend role in the preparation of the SA.

Assumptions and Difficulties encountered

- 3.18 The Scoping Report was initially written in 2009 and the SA of the Draft Local Plan commenced in July 2012, resulting in a gap of time. Measures to address this include a review of the Scoping Report in September 2010, and review of plan, programmes and baseline data in the preparation of this SA.
- 3.19 The Sustainability Appraisal process provides a useful tool in identifying issues and suggesting possible forms of mitigation. It tests the performance and robustness of policies against the Council's sustainability objectives. However, there are a number of uncertainties and limitations that exist in the sustainability appraisal process, which are summarised below:
- The principal source of difficulty undertaking the SA is the reliance on the judgement of predicting and assessing effects. However, the SA has been undertaken by a professional with experience in town planning and sustainability issues. Consultation, including use of a consultant 'critical friend' (CAG Consultancy who undertook to SA of the Core Strategy) on the SA report added value to the process through consideration of other 'experts' and interested stakeholders to review the effects identified and provide alternative opinions for further scrutiny.
 - Difficulties have been identified in respect of predicting the impact of the Local Plan in the long term, which has further complicated the process of accurately appraising the sustainability of the strategy.
 - Difficulties associated with and distinguishing between and separating out the influence of the Local Plan from other external factors. For example whilst the predicted trends for a particular baseline indicator may suggest that the situation is worsening over time (for example air quality or crime or health or education statistics); it may be due to various

- factors beyond the control of the Local Plan, the Local Plan itself may still have a positive influence in so far as planning can influence such areas.
- A further difficulty was the identification of *significant* effects, in particular with reference to those sustainability objectives that result from a very broad range of interacting factors (for example health and health inequalities).

Next Steps

- 3.20 This SA report will be published alongside the Lambeth Local Plan Proposed Submission November 2013 for an eight week period in December 2013 and January 2014, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 19. Notification of its availability will be made in accordance with the requirements of the Regulations.

4. CHARACTERISATION AND SA FRAMEWORK

- 4.1 This section provides a brief profile of Lambeth Borough, including an overview of key environmental, social and economic characteristics. The information provided is drawn largely from the Local Plan, 2011 Census data and State of the Borough Report 2012. More detailed information on the Borough is provided as baseline data against the sustainability objectives of the Local Plan policies (see Section 5C).
- 4.2 The London Borough of Lambeth covers an area of about ten and a half square miles, including Waterloo and the South Bank, Vauxhall, the Oval, Kennington, Stockwell, Clapham, Brixton, Loughborough Junction, Herne Hill, Streatham, Tulse Hill, West Norwood and Gypsy Hill. Located in the southwest of London, Lambeth has approximately 3.2 kilometres of Thames frontage, and is situated on the southern bank of the Thames neighbouring the boroughs of Southwark, Croydon, and Wandsworth and Merton to the east south and west respectively, and Westminster and the City of London to the north across the Thames. Lambeth is an inner London borough with the north of the borough having a mix of central London activities, while the south of the borough is predominately suburban in character. The total area of open space in Lambeth is just less than 844 hectares, representing 31 percent of the area of the borough (GiGL 2011). Current provision of unrestricted open space is approximately 1.49 hectares per 1,000 people, although access is unevenly spread and particularly limited in the north of the borough. This figure is similar to that for other inner London boroughs.
- 4.3 Lambeth is an area of contrasts. The northern part of the borough features internationally-significant central London activities centred around Waterloo and South Bank area, including the South Bank Centre, major corporate offices, the London Eye and Oval Cricket Ground. Heading south this area gives way to the eclectic centres of Brixton and Clapham with their unique blend of entertainment, speciality retail and cultural industries, surrounded by a culturally-diverse residential population. Further south again are the suburbs of Streatham and Norwood which also feature locally important town centres. With no strategic industrial locations in Lambeth, locally significant sites known as Key Industrial Business Areas are protected and these are scattered throughout the Borough providing a total area of 49.14 hectares (2010/11 Annual Monitoring Report).
- 4.4 The Borough has an important historic environment with 62 Conservation Areas covering approximately 30 per cent of the Borough including circa 2,500 listed buildings, the vast majority of which are nineteenth century residential dwellings. There are also 17 Archaeological Priority Zones and eight historic Registered Parks and Gardens as well as protected strategic views in the north of the borough of St Pauls Cathedral and the Palace of Westminster which is a World Heritage site.
- 4.5 Lambeth is a very diverse Borough ethnically, culturally, socially and economically and this diversity is constantly evolving. It is the among the most densely populated local authority in England, with over 100 persons per hectare, more than twice the London population density (State of Borough Report 2012). Lambeth's population is 303,100, which makes it the third largest population in inner London, after Newham (308,000) and Wandsworth (307,000) (Census 2011). The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. The borough is the 14th most deprived district in England (State of Borough Report 2012), comparable with Southwark, Lewisham and Haringey, but less deprived than the most deprived London boroughs of Newham, Tower Hamlets and Hackney. Unemployment is a major barrier to economic prosperity; with an unemployment rate of nine percent as at June 2010, it is comparable to both central London and London as a whole. Most businesses (87%) in the Borough are small and employ up to nine people. Sixty businesses each employ 250 or more people and these 60 businesses account for 28% employment of all jobs in the borough (Local Economic Assessment 2011).

- 4.6 Public transport provision in the Borough is generally good, with 14 overground railway stations evenly spread throughout the borough and nine underground stations predominantly in the north. However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. Access to public transport is good in north and central Lambeth however; residents in Streatham and West Norwood are dependent on rail and bus connections. As Lambeth has the lowest car ownership rate in London, there is even more reliance on public transport.
- 4.7 The diverse character of Lambeth Borough has given rise to a number of complex spatial issues that have been addressed in the Local Plan (Table 3).

Table 3: Key Sustainability Issues in Lambeth Borough

| Characteristics | Key sustainability issues |
|--|---|
| <p>Housing</p> <ul style="list-style-type: none"> • Access to good housing. • Affordable housing. • Sustainable housing. • Housing mix and types. | <p>The Borough is required to deliver the London Plan 10 year housing target of 11,950 new dwellings between 2011 and 2021. Affordability is a major challenge in Lambeth where the entry level price for housing is very high in relation to average household income. There is a specific shortage of affordable family sized accommodation, and there are particular shortages of housing suitable for people with extra care needs, mental health needs, learning disabilities, substance misusers and ex-offenders (Housing Needs Assessment Update 2012).</p> |
| <p>Employment and Economy</p> <ul style="list-style-type: none"> • Increasing jobs, particularly local jobs for local people. • Addressing high rates of child poverty. • Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups. • Tackling barriers to employment. <p>§ London's role in the UK economy.</p> <p>§ New business development.</p> <p>§ Business retention.</p> <p>§ Inward investment.</p> <p>§ Targeting key economic sectors.</p> <p>§ School placements</p> | <p>There is a need to increase the number and variety of businesses in the Borough and help local residents access those jobs. For the workless population, the barriers to employment and enterprise can include low skill levels and low levels of educational attainment, reluctance to take 'low quality' jobs in some cases, difficulty finding suitable work within easy travelling distance, difficulty finding affordable childcare, a history of offending, substance misuse or mental illness, physical or learning disabilities, and the lack of space to start businesses from home in very high density housing. The new 'green industries' are a growth sector covering construction, energy and waste management that will bring new jobs opportunities and skills for local people, including through social enterprise.</p> <p>The number of school places in the Borough is currently insufficient to meet future demand, both at secondary and primary level.</p> <p>There is a need to control the location of new betting offices, pawnbrokers and pay-day lenders. Too many in one area can lead to a negative impact on the vitality and viability of a town centre.</p> <p>The health of local residents is a key concern of the Council. Reducing childhood obesity is one element of the drive to improve people's health. The location of hot food takeaway shops near schools is a concern for the Council as it provides convenient access for pupils to access unhealthy food.</p> <p>Evening economy and food and drinks uses bring investment and vitality into areas however, this has also brought some problems in terms of its impact on local residents.</p> <p>As is the case elsewhere in London, and across the country as a whole, public houses are being lost at an alarming rate. Pubs can provide a valuable community asset and are a hub for social interaction. They also have a valuable economic role, contributing to local employment generation.</p> |
| <p>Environment and Climate Change</p> <ul style="list-style-type: none"> § Reducing CO2 emissions. § Climate change adaptation, including flood risk management § Efficient use and management of resources. § Efficient use and management of water: addressing increasing demand. § Efficient use and management of energy. § Efficient management of waste: increasing recycling | <p>Flood risk is a key issue in some parts of the Borough, and the frequency and severity of flood events has the potential to increase as a result of climate change. A large part of the north of the Borough is located within the highest flood risk zone (level 3a), with the principal risk from tidal flooding of the River Thames. There is an additional risk of fluvial flooding close to the river Graveney in the south of the Borough. Further risks arise across the Borough from sewer and surface water flooding.</p> <p>Development will need to minimise energy consumption, contribute toward renewable energy production and help improve the environment through sustainable design and construction. Mixed use development will work to minimise travel to work. Total energy consumption in Lambeth equates to 3.2 per cent of the total energy consumption in London and Lambeth ranks 11th out of the 33 London boroughs. The domestic sector accounts for over half of consumption in the borough and gas is the primary fuel type (82 per cent of total domestic consumption). In relation to levels of energy produced from Combined Heat and Power, Lambeth ranks 24th among all London boroughs. It has been estimated that 32,800 (26%) of Lambeth residents are in fuel poverty.</p> |

| | |
|--|---|
| <p>rates and self sufficiency in waste disposal.</p> <p>§ Pressure on biodiversity and open spaces.</p> | |
| <p>Transport</p> <p>§ Good local access to services and facilities.</p> <p>§ Tackling congestion.</p> <p>§ Increase public transport accessibility, cycling and walking.</p> | <p>Public Transport provision in the borough is generally good, with 14 overground railway stations evenly spread throughout the borough and nine underground stations predominantly in the north. However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. This situation will worsen with increasing living and working populations. Ultimately this will impact on access to jobs, Lambeth's economic wellbeing and the attractiveness of the borough to investors.</p> <p>There are many bus routes, with major interchanges at Waterloo, Vauxhall and Brixton. Public transport accessibility is good in north and central Lambeth. However, residents in Streatham and Norwood are without direct access to the underground and are dependent on rail and bus connections for their needs. With bus routes tending to be focussed on the main north-south radial routes into central London and a lack of east-west services, some areas of the borough continue to have low levels of accessibility compared to the rest of Lambeth.</p> |
| <p>Equalities and Accessibility</p> <p>§ Mixed communities.</p> <p>§ Cohesive communities.</p> <p>§ Safe communities.</p> <p>§ Accessible communities.</p> <p>§ Meeting the needs of diverse communities.</p> <p>§ Addressing social inequities.</p> <p>§ Tackling crime.</p> <p>§ Tackling terrorism.</p> <p>§ Addressing fear of crime.</p> | <p>Some communities feel that their neighbourhoods lack stability and that not enough households stay long enough to put down roots and contribute positively to community life.</p> <p>A number of Lambeth's neighbourhoods are currently struggling with high levels of ill-health (including mental ill-health), educational under-achievement, child poverty, worklessness, crime and fear of crime, gang-related violence and anti-social behaviour. Coverage of community facilities is unevenly spread across the Borough, with some neighbourhoods experiencing severe shortages of useable space, while others apparently have too many under-used facilities.</p> <p>The most deprived areas are spread throughout the Borough but are particularly concentrated in Coldharbour ward, in Brixton, and in the Crown Lane area of Knights Hill ward in the south of the Borough.</p> |
| <p>Health and Well Being</p> <p>§ Improving air quality (and meeting EU targets).</p> <p>§ Addressing health inequalities and the health needs of Lambeth's existing and new residents.</p> <p>§ Develop healthy communities and help improve and protect the health and well being of residents.'</p> | <p>Road traffic is the primary cause of air pollution in Lambeth, as well as the rest of London. The vehicle emissions of greatest concern are Nitrogen Dioxide, Fine Particulates (PM10), Carbon Monoxide and Volatile Organic Compounds (VOC's) such as Benzene. High levels of any of these pollutants can affect health, making breathing problems, such as asthma, and heart problems worse. An inventory of all air pollution emissions in London was compiled by the London Research Centre. The inventory estimates that vehicles in Lambeth emit over 20,000 tonnes of the above pollutants every year. This represents 90% of air pollution emissions from all other sources in the borough. In addition vehicles in Lambeth create nearly a quarter of a million tonnes of the greenhouse gas carbon dioxide which contributes to global warming.</p> <p>Health facilities need to be able to deliver services to the increasing population and should help address the significant health inequalities that currently exist between wards. Access to leisure and recreation facilities needs to be improved for all residents in the Borough, but particularly for those in more deprived neighbourhoods. Crime and anti-social behaviour are a major concern for residents. Reducing crime and perceptions of crime in the built environment will also be important in responding to this key concern.</p> |
| <p>Town centres and Regeneration</p> <p>Viable, safe and well managed town centres:</p> <p>§ Brixton</p> <p>§ Streatham</p> <p>§ Clapham</p> <p>§ Stockwell</p> <p>§ West Norwood / Tulse Hill</p> <p>Regeneration of Vauxhall and Waterloo Opportunity Areas.</p> | <p>Regeneration of Waterloo and Vauxhall is expected to maximise densities, taking account of local residential amenity and other needs.</p> <p>New shops need to be located in a way that supports rather than undermines Lambeth's existing town centres, and in areas of high public transport accessibility. Maintaining active street frontages and an appropriate mix of ground floor uses are also key issues along with the need to maintain and improve the environment, public realm and community safety.</p> <p>Lambeth's two major centres, Brixton and Streatham, both have significant potential for new commercial and residential development, supported by effective town centre management and contributions to increased public transport infrastructure where required. This will help to secure their future prosperity in the face of major planned retail and leisure expansion at Elephant and Castle and Battersea.</p> <p>Lambeth's local centres and street markets need strong protection given the essential contribution they make to neighbourhoods and communities, to local distinctiveness and to reducing the need to travel.</p> |
| <p>Open Space and Recreation</p> <p>§ Better use of open space</p> <p>§ Biodiversity</p> | <p>Some areas, particularly in the north of the Borough, have limited access to unrestricted open space. The current ratio of 1.54ha of unrestricted open space per 1000 population is predicted to decrease as a result of population increase and housing growth, given limited opportunities to create major new areas of open space in the Borough. Therefore, pressures on open space will become even more intense across the Borough, including burial spaces. There is a need to protect and enhance the wide range of habitats and</p> |

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| | |
|--|--|
| | species that contribute to the Borough's biodiversity. |
| The Built Environment § Location of tall buildings § Built heritage | The Borough's 62 distinct conservation areas, numerous listed buildings, archaeological priority zones and historic registered parks and gardens are highly valued and should continue to be protected and/or enhanced. Important strategic and local views need to be protected. There are also valued views to and along the River Thames that may be affected by waterfront development. |
| Infrastructure § Infrastructure provision, including healthcare services and facilities; and schools | Lambeth's future housing growth, economic development and environmental sustainability cannot be achieved without a wide array of essential infrastructure provided by a combination of council run services, partner statutory agencies and private sector companies. Some areas of infrastructure provision are particularly critical over the next 15 years because they are already subject to considerable pressure for resources and / or additional land and facilities are required in order to support projected population and economic growth. These include public transport, school places, health and social care services, open space, facilities for policing the Borough and waste facilities. |

SA Framework

4.8 The SA Framework is shown in Table 4 below, alongside appraisal prompt questions and targets. The SA Framework objectives and targets were developed taking account of key sustainability issues in the borough. It was developed in the Scoping Report and has since been updated in response to consultation comments received (Appendix 3). As a result, the SA Framework presented below is slightly different to that presented in the Scoping Report. This SA Framework has been used to test the spatial strategy and vision, strategic objectives, policies and options for the Local Plan.

Tensions between SA Objectives

4.9 While each of the above revised objectives seeks to achieve sustainability in their own right, inevitably it is considered that inherent tensions arise between sustainability objectives seeking to improve economic and social conditions (in other words developmental objectives) and those seeking to protect or improve the natural environment (protective objectives). For example, achievement of Objectives 16 to 18 (economic stimulation) may result in potential tensions with objectives 10 to 14 (environmental protection). However the nature of sustainable development requires a holistic overall judgement of activities and assessment of effects.

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

Table 4: Sustainability Objectives

| SA Objective | Appraisal prompt questions and targets | Targets | SEA Topic Requirement |
|--|---|---------|-----------------------|
| SOCIAL | | | |
| 1. Crime and safety. Ensuring safe communities with reduced crime and disorder. | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • reduce the opportunities to commit crime and engage in antisocial behaviour? • help address the fear of crime as well as crime itself? • create the conditions for communities to develop which will support a reduction in crime and the fear of crime? • reduce Lambeth's vulnerability to major challenges such as climate change and water shortages? • reduce Lambeth's vulnerability to terrorist action? • reduce the need for motorised travel? • encourage walking and cycling, for instance by reducing traffic accidents to pedestrians and cyclists? • reduce accidental injuries and deaths among young people | | Population |

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| SA Objective | Appraisal prompt questions and targets | Targets | SEA Topic Requirement |
|--|---|---|--|
| SOCIAL | | | |
| <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>Will the strategy/policy...</p> <ul style="list-style-type: none"> • protect health and wellbeing? • reduce poverty, including child poverty? • reduce health inequalities? • improve mental, emotional and physical health, and wellbeing? • encourage the development of healthy neighbourhoods? • make walking and cycling more attractive relative to other alternatives? • improve access to health care services? | <p>London Plan KPI 6: Reducing Health Inequalities <i>Reduction in the gap between life expectancy at birth of Londoner's living within the 11 Spearhead PCTs vs the 20 remaining PCTs, 2011–2031</i></p> | <p>Population, Human Health</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... Improve access (including through ICT) for all residents to services, jobs, leisure and amenities near home, reducing the need to travel? Including:</p> <ul style="list-style-type: none"> • Schools • Nurseries • GPs and hospitals • Libraries • Places of worship • Food shops (especially those selling fresh, healthy food) • Community centres • Children's play areas • Sports and recreation facilities • Open spaces and wildlife habitats • Police and emergency services • Banking facilities and post offices | | <p>Population, Human Health</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>Will the strategy/policy...</p> <ul style="list-style-type: none"> • Ensure that appropriate infrastructure keeps pace with population growth, in particular: <ul style="list-style-type: none"> ○ water and sewerage infrastructure ○ health 'infrastructure' (facilities and services) ○ schools ○ green infrastructure ○ transport. | <p>London Plan KPI 12: Improving the provision of social infrastructure and related services. <i>An increase in the provision of childcare places per 1000 under fives, particularly in Regeneration Areas</i></p> <p><i>School places to match School Role Projections</i> Note: Dependent upon school role projections being made available</p> | <p>Population, Human Health, Material Assets</p> |

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| SA Objective | Appraisal prompt questions and targets | Targets | SEA Topic Requirement |
|---|--|--|--------------------------|
| SOCIAL | | | |
| 5. Equality and diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion. | Will the strategy/policy... <ul style="list-style-type: none"> • promote equity, or fairness between population groups? • improve environmental conditions for Lambeth's deprived areas and deprived communities? • reduce poverty and social exclusion? • promote social cohesion within and between population groups? • enable social integration between minority groups and wider society? | London Plan KPI 11: Increased employment opportunities for those suffering from disadvantage in the employment market <i>Reduce the gap in unemployment rates between BAME groups and the white population and reduce the gap between lone parents on income support in London vs England & Wales average</i> | Population, Human Health |

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| SA Objective | Appraisal prompt questions and targets | Targets | SEA Topic Requirement |
|--|---|---|--|
| SOCIAL | | | |
| <p>6. Housing. Ensuring everyone has the opportunity for <u>an affordable</u> decent home, quiet enjoyment of that home and the protection of local amenity.</p> | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • increase access to good housing? • meet affordable housing targets? • meet sustainable housing standards? • increase the mix and type of housing, including family units?. • reduce actual noise levels and disturbances from noise? • tackle homelessness? | <p>London Plan KPI 4: Increase the supply of new homes <i>Completion of 33,380 additional homes per year</i></p> <p>London Plan KPI 5: An increased supply of affordable homes <i>Completion of 13,200 additional affordable homes per year (60% social housing, 40% intermediate)</i></p> <p>London Plan borough housing target for Lambeth: 12,550 ten year target or 1,255 per annum.</p> <p>Targets set for Opportunity Areas employment capacity and minimum homes: Vauxhall, Nine Elms, Battersea: 10,000 new homes (could be increased to 16,000 depending on scale of public transport improvements) Waterloo: 1,900</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>Lambeth LAA target – number of affordable homes delivered: 480 – 2008/09 550 - 2009/10 570 - 2010/11</p> <p>Lambeth SPD on Sustainable Design and Construction 2008: The Council aspires to BREEAM “Excellent” and seeks “Very Good” as a minimum standard. In line with the Energy Saving Trust’s minimum recommendation, the Council seeks the achievement of Code Level 3 as a minimum standard and aspires to Code Level 4 in the majority of developments. Note: The SPD is in need of revision and updating.</p> | <p>Population, Human Health, Material Assets</p> |

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| SA Objective | Appraisal prompt questions and targets | Targets | SEA Topic Requirement |
|---|---|--|--|
| SOCIAL | | | |
| <p>7. Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.</p> | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • enhance the quality and quantity of open space and the public realm? • reduce the proportion of the public realm where noise precludes conversation or where other environmental factors (e.g. fumes) make it unpleasant to be? • promote community engagement? • promote interactions between different sectors of the community? • promote good governance? • promote wellbeing and help to make people feel positive about the area where they live? • promote child-friendly buildings? • promote Lambeth as a place that people want to put down roots rather than just pass through? | | <p>Population, Human Health, Material Assets, Landscape, Cultural Heritage (including architectural and archaeological heritage)</p> |
| ENVIRONMENTAL | | | |
| <p>8. Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and historic assets.'</p> | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • protect sites, features and areas of historical, archaeological and cultural value/potential and their settings? • enhance the provision of cultural facilities (e.g. public art) and possibilities for cultural events/activities (e.g. festivals)? • aspire to a range of buildings and architecture that reflect the cultural diversity of the borough? • conserve and enhance the townscape/cityscape character, including historical, archaeological and cultural value/potential and its contribution to local distinctiveness? • increase access to, enjoyment of and understanding of, historical, archaeological and cultural sites, features and areas? • protect, enhance or create open space? • protect valued views? • identify locations where tall building are acceptable? | <p>Lambeth Open Space Strategy 2004, later revised 2007 and now currently being further updated recommended that Lambeth should aim to double the number of good quality open spaces in the Borough</p> <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>London Plan KPI 24: Protecting and improving London's heritage and public realm <i>Reduction in the proportion of buildings at risk as a percentage of the total number of listed buildings in London</i></p> | <p>Landscape, Cultural Heritage (including architectural and archaeological heritage)</p> |

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| SA Objective | Appraisal prompt questions and targets | Targets | SEA Topic Requirement |
|---|--|---|---|
| SOCIAL | | | |
| <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>Will the strategy/policy...</p> <ul style="list-style-type: none"> • reduce travel? • encourage a shift to more sustainable forms of travel: walking, cycling and public transport? • encourage greater efficiency in the transport network, such as through higher load factors? • integrate new development, especially residential development, with sustainable transport choices? | <p>London Plan KPI 13: Achieve a reduced reliance on the private car and a more sustainable modal split for journeys (public/private transport modal split) <i>Use of public transport per head grows faster than use of the private car per head</i></p> <p>London Plan KPI 14: Achieve a reduced reliance on the private car and a more sustainable modal split for journeys (zero traffic growth). <i>Zero traffic growth in central and inner London, and traffic growth in outer London reduced to no more than 5 per cent</i></p> <p>London Plan KPI 15: Achieve a reduced reliance on the private car and a more sustainable modal split for journeys (increased bicycle modal share) <i>Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026</i></p> <p>As measured by DfT</p> <p>London Plan KPI 16: Achieve a reduced reliance on the private car and a more sustainable modal split for journeys (increased passenger and freight transport on the Blue Ribbon Network) <i>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 and at least 90 per cent of B2 and B8 development in Zones 0–2</i></p> | <p>Population</p> |
| <p>10. Biodiversity. To conserve and enhance biodiversity, and to bring nature closer to people.</p> | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • conserve and enhance habitats and provide for the long-term management of natural habitats and wildlife? • protect and enhance access to open space and improve the quality of publicly accessible green space? • Improve connectivity between wildlife sites? • increase and enhance the resilience of Lambeth's key priority habitats and species in line with its Biodiversity Action Plan's long term vision and objectives? • encourage replacement of valuable lost habitat? • bring nature closer to people, i.e. help conserve local nature conservation amenity, including gardens? | <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 targets: (those appropriate to Lambeth's BAP priority habitats): Conserve/Increase by 2020 (on 2008 baseline):</p> <ul style="list-style-type: none"> • 1466 ha/ 10ha acid grassland • 4909ha/ 20ha woodland • Conserve 2,300 ha saltmarsh or mudflat of Tidal Thames; • 599 ha/ 250 ponds <2ha conserved ponds, lakes and reservoirs; • 185 ha conserved and/or enhanced wasteland (equivalent to Lambeth's built environment habitat?) <p>No more than 120 residential units to be developed on garden land/year</p> | <p>Biodiversity, Flora, Fauna, Landscape, Soil, Water</p> |

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| SA Objective | Appraisal prompt questions and targets | Targets | SEA Topic Requirement |
|--|---|---|---|
| SOCIAL | | | |
| <p>11. Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.</p> | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • reduce emissions of greenhouse gases by reducing energy consumption? • increase the proportion of energy both produced and used from renewable and sustainable resources? • reduce the impacts of climate change? e.g. urban heat island effect, flooding and drought? • ensure adaptation to the future impacts of climate change? • ensure that new and retrofitted development and infrastructure is located, designed and constructed to withstand the effects of climate change over its design life? • promote high quality, appropriate design and sustainable construction methods in all types of building, including new build and retrofit? • promote the highest standards of energy and environmental performance for new and existing buildings? • minimise embedded carbon in new buildings and development? | <p>London Plan KPI 20: Reduce carbon dioxide emissions through new development <i>For strategic developments achieve zero carbon in residential development by 2016 and zero carbon in all development by 2019</i></p> <p>London Plan KPI 22: Increase in energy generated from renewable sources <i>Production of xxGWh of energy from renewable sources by 2026</i></p> <p>The target will be developed in accordance with a Regional Renewable Energy Assessment in 2010, as required by Office for Renewable Energy Deployment</p> <p>London Plan targets: 60% reduction of CO2 emissions by 2025: (against 1990 base)</p> <p>Lambeth LAA: Per capita Co2 emissions reductions of 2% (08/09), 5% (09/10) and 10% (10/11) on baseline of 5.5 tonnes per capita.</p> <p>Lambeth SPD on Sustainable Design and Construction 2008: Use of water: the design of development should seek to minimise the use of water resources. The Council sees Code Level 3 as a minimum standard and aspires to Level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day. <i>Note: The SPD is in need of revision and updating.</i></p> | <p>Climatic Factors, Materials Assets</p> |

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| SA Objective | Appraisal prompt questions and targets | Targets | SEA Topic Requirement |
|---|--|---|------------------------------------|
| SOCIAL | | | |
| <p>12. Water resources and flood risk management. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.</p> | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve the quality of water and waterbodies (surface and groundwater)? • reduce piped water consumption e.g. through reducing demand and encouraging recycling in households? • reduce waste water and sewage needing processing? • support sustainable urban drainage? • minimise the risk of all types of flooding (tidal, fluvial, surface water and sewerage) to people and property and manage flood risks appropriately both now and in the long-term? | <p>London Plan KPI 23: Improve London's Blue Ribbon Network <i>Restore 15km of rivers 2009–2015</i> London Plan target: Maximum water use target of 105 litres per person per day for residential development. (To be reviewed in light of Code for Sustainable Homes targets, essential standard of 80 litres/ person / day by 2016 at latest). Aim to achieve Greenfield run off from sites through incorporating rainwater harvesting and sustainable drainage.</p> <p>Lambeth SPD on Sustainable Design and Construction 2008: Use of water: the design of development should seek to minimise the use of water resources. The Council sees Code Level 3 as a minimum standard and aspires to Level 4 of the Code for Sustainable Homes. The Code sets the target for water consumption at 105 litres per person per day.</p> | <p>Water, Climatic Factors</p> |
| <p>13. Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.</p> | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • minimise the production of waste, maximise recycling and reuse during construction, and decrease the demand for raw materials from unsustainable sources e.g. through reusing demolition material onsite and using products made from recycled materials? • make waste avoidance, reuse and recycling easy for residents and visitors? • help develop markets for recycled products by using them? • enable safe storage of waste and recycling, convenient for both residents and collectors? • make appropriate provision for waste management facilities in the Borough to help meet the London Plan apportionment and self sufficiency targets? | <p>London Plan KPI 19: Increase in municipal waste recycled or composted and elimination of waste to landfill by 2031 <i>At least 45 per cent of waste recycled/composted by 2015</i> <i>0 per cent to landfill by 2031</i> London Plan borough apportionment: 342,000 tonnes per annum by 2031 (municipal solid waste and commercial/ industrial waste). Current existing licensed capacity: 11,000 tonnes.</p> <p>Exceed recycling or composting levels in commercial and industrial waste of 70% by 2020 Achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020 (and 80% recycling of that waste as aggregates in London by 2020) (boroughs need to ensure land resources available to implement the above).</p> | <p>Population, Material Assets</p> |

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| SA Objective | Appraisal prompt questions and targets | Targets | SEA Topic Requirement |
|---|---|---|---|
| SOCIAL | | | |
| 14. Air quality. To improve air quality. | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • reduce emissions of PM10, NO2 and ozone depleting substances? • help to achieve national and international standards for air quality (e.g. those set out in the Air Quality regulations 2000 and (Amendment) Regulations 2002 as well as local air quality management targets? • support the planting of trees? • promote the 'transport hierarchy'? | | Air |
| ECONOMIC | | | |
| 15. Education and skills. To maximise the education and skills levels of the population. | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve opportunities and facilities for formal, informal and vocational learning (including volunteering) for all ages? • contribute to up-skilling and to meeting skills shortages? • promote healthy, sustainable living? | | Population, Material Assets, Human Health |
| 16. Local economy. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses. | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve the resilience of business and the economy e.g. through supporting indigenous and local business, diversification, corporate social responsibility, accommodating low income workers, supporting and driving the marketplace? • support employment opportunities in the most deprived areas and groups and stimulate regeneration? • enable people to live better for a given income by reducing their need for paid goods and services? • contribute to sustainable tourism? | <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> | Population, Material Assets |
| 17. Regeneration and efficient use of land. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings. | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • maximise regeneration benefits to the most deprived areas and communities? • promote the efficient, innovative and multifunctional use of land? • ensure the provision of adequate quantities and type of public realm? • protect the Borough's soil resource? | <p>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> 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 SRQ matrix</i></p> | Material Assets, Soil |

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| SA Objective | Appraisal prompt questions and targets | Targets | SEA Topic Requirement |
|--|--|--|------------------------------------|
| SOCIAL | | | |
| <p>18. Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.</p> | <p>Will the strategy/policy...</p> <ul style="list-style-type: none"> • improve accessibility to employment, especially for local people? • improve employment opportunities among Black, Asian, Ethnic and Minority groups? • protect local employment land and uses? • tackle the causes of worklessness such as provision of affordable childcare? • provide additional housing near places of work? | <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 to be in line with benchmarks in the Industrial Capacity SPG</i></p> <p>South west sub region of London <i>projected</i> to provide 70,000 more jobs by 2026.</p> <p>Indicative employment capacity set for Opportunity Areas Vauxhall, Nine Elms, Battersea: 15,000 Waterloo: 15,000</p> | <p>Population, Material Assets</p> |

5. LIKELY SIGNIFICANT EFFECTS OF THE LOCAL PLAN

5.0.1 This section sets out the significant effects, both positive and negative, identified in the appraisal work on the Local Plan objectives, policies, site allocations and reasonable alternatives. The findings start with an appraisal of the Local Plan objectives, followed by an appraisal of the Local Plan strategic and development management policies, and site allocations.

5.0.2 The SEA Directive states:

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

Assessing significance

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

5A LOCAL PLAN OBJECTIVES APPRAISAL

5A.1 The strategic objectives set out how the Local Plan vision will be delivered. These strategic objectives underpin the more detailed Local Plan policies; therefore it is necessary to appraise the Local Plan objectives for compatibility with the SA objectives. The Local Plan objectives have not been included in the partial review of the Core Strategy, and accordingly there is no proposal to change the objectives. Therefore, while the objectives will be appraised in this SA (for the purpose of completeness), it is not expected that the appraisal results for objectives will differ from the SA undertaken in August 2009 on the submission version Core Strategy (whereby SA recommendations were addressed). Assessing the relationship between SA objectives and the high level strategic objectives will help identify whether the spatial vision for Lambeth is in accordance with sustainability principles. The results of the assessment are presented in Table 5 (next page).

Key

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

Table 5: Compatibility of Local Plan Objectives and SA Objectives

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

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

1, 6: As briefly outlined above sites used for waste management and operational use are within largely residential areas and accordingly effects arising from this operation (such as heavy lorry vehicle use, noise, odour) will need to be carefully managed to respect local amenity and mental, emotional and physical wellbeing of residents. Development management policies should seek to mitigate and manage effects.

2-3: Delivery of the 17,925 additional dwellings (minimum) to 2027/28 will need to be located in areas that are accessible to services, jobs, leisure and amenities with appropriate provision of infrastructure to support this growth. Other objectives seek to ensure this is addressed.

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

7-9: Accommodating 17,925 additional homes together with necessary infrastructure to support the resultant population growth will likely produce additional pressures on the built and historic environment, both in terms of increased demand for accessibility to historic assets and sites, and in terms of development pressure for land for other uses such as housing, infrastructure or waste.

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

12–15, 36: Development pressures for different land-uses including housing, schools, waste sites and regeneration schemes have potential to threaten biodiversity and open spaces, including gardens. Accordingly potential adverse effects should be avoided or mitigated and the Lambeth Biodiversity Action Plan should be used to guide and inform decisions for activities and redevelopment.

16 – 20: Growth and development will likely increase carbon emissions. Therefore such development needs to be sustainably designed and constructed to minimise carbon emissions as far as practicable. Development management policies should provide further detail on managing and reducing emissions.

21-34: Similar to the above points; development and economic growth in the Borough is likely to have some impact on air quality and natural resources such as soil, land, ecosystems and water. However, it is considered that with adequate policies, these aspects of the natural environment can be managed efficiently taking into account the expected growth assigned to the Borough under the London Plan.

35, 37: Maintaining an appropriate supply of land for waste management could potentially restrict the Borough's ability to create prosperity and business growth; however it can also provide opportunity to progress green industries related to waste management. Similarly, competing demands for land will raise questions on whether sites designated for waste management are an efficient use of land which promotes efficient, innovative and multifunctional use of land.

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

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

5B REASONABLE ALTERNATIVES

Core Strategy: Spatial Strategy and Strategic Objectives

- 5B.1 The Issues and Options Report 2008 prepared for the Core Strategy presented a number of options and reasonable alternatives to the spatial strategy to be pursued, including options for housing, flat conversions, employment, waste management and tall buildings. Further detail of this process, including a summary of the SA results of the broad strategic options can be found in Appendix 5, and the full Report (Appendix 6) can be viewed online at <http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/LocalPlan/SustainabilityAppraisalForThePlanningPolicyEvidenceBase.htm>
- 5B.2 As the spatial strategy, vision and objectives remain unchanged from the adopted Core Strategy (see Appendix 1 – review of approach table); the reasonable alternatives and SA/SEA of these also remain relevant and therefore are not repeated in this SA on the Local Plan nor has any additional work been done on them. The final SA and SEA of the London Borough of Lambeth Submission Core Strategy has been reviewed in the preparation of this SA and is available on the Council website (Appendix 7), as is the Sustainability Adoption Statement (Appendix 8) at <http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/LocalPlan/SustainabilityAppraisalForThePlanningPolicyEvidenceBase.htm>

Reasonable Alternatives of policies for Draft Local Plan 2013

- 5B.3 Reasonable alternative (RA) approaches have been considered in the Local Plan making process for those policies that differ from adopted Core Strategy policy and some new development management policies, and these are set out in the Topic Papers (see Evidence Base). Each of these have been appraised against the sustainability framework, and broadly include the following areas: affordable housing, housing mix, housing standards, student housing, housing to meet specific community needs and hostels and HMOs, KIBAs, business uses outside KIBAs, railway arches, town centres, evening economy and food and drinks uses, A2 uses, hot food takeaways near schools, skills and training, schools, parking, food growing spaces and waste management. These RA's of policies were evaluated in the SA of the Draft Local Plan (i.e. SA dated February 2013) and a summary table of results is provided in Appendix 5.
- 5B.4 For some policies, no reasonable alternatives have been identified. A review of approach for policies having no reasonable alternative identified is also provided in Appendix 5.
- 5B.5 No representations received made mention of the RAs or the appraisal of RAs. In terms of resulting policy change from RA / SA work; policy approach on hot food takeaways has changed to apply in town centres (previously, A5 uses within town centres were excluded from the policy).

5C POLICIES AND SITE ALLOCATIONS APPRAISAL

- 5C.1 A common approach to Sustainability Appraisals is to assess policies individually against each of the SA objectives usually in a matrix format. The approach to this SA is to assess the Local Plan as a whole against each of the 18 SA objectives. In terms of policy assessment; this was considered the most appropriate method as it would be misleading to conclude that an individual policy would have a negative impact on an SA objective when another policy in the Local Plan has been included to ensure such a negative impact is avoided.
- 5C.2 To assist the SA process on the Local Plan policies, it was necessary to first screen them broadly against the SA objectives to determine whether each policy was capable of having any significant effect (either positive or negative) on the attainment of any of the SA objectives. This judgment was based on the subject matter of the policy. This screening process identifies which policies to focus on when appraising the effect of the Local Plan on each of the SA objectives (indicated as shaded cells). The results of the screening exercise are shown in Table 7 and indicate that the achievement of the SA objectives will largely depend on the sustainability and implementation of a variety of Local Plan policies, and that most policies interact with a number of objectives.
- 5C.3 In accordance with the requirements of the SEA Directive and guidance for SAs, the appraisal is structured under the following sub-headings:
- § Relevant policy objectives (international, national, regional and local).
 - § Baseline conditions, existing issues and their likely evolution with the plan.
 - § Likely significant effects of implementing the Local Plan as a whole, taking into account mitigation.
 - § Recommendations for monitoring likely significant effects.
- 5C.4 Relevant policy objectives, baseline conditions and existing issues that are described in the appraisals below offer updated data or particularly pertinent policy objectives to the appraisal work and these act to supplement information provided in the Scoping Reports.
- 5C.5 SA recommendations have been made in this iteration of SA, results of which have fed into the Lambeth Local Plan Proposed Submission November 2013. SA recommendations are provided throughout the appraisal below and the Council's response to each is also set out below in the appraisal. Appendix 1 provides an audit trail containing all SA recommendation made in February 2013 and the Council response for each.
- 5C.6 The assessment of significant effects of the Local Plan on an SA objective includes expected magnitude and spatial extent, the timescale over which they will have an effect, their likelihood, the impact of cumulative effects and whether the effect will be temporary or permanent. The topic based approach to this SA whereby the Local Plan as a whole is taken into account also allows distinct identification, consideration and assessment of cumulative effects. Taking into account the Plan period (up to 2030) the following approach as been adopted for the timescales:
- | | |
|--------------|---------------------|
| Short term: | First 5 years |
| Medium term: | 5 years to 10 years |
| Long term: | More than 10 years |
- 5C.7 Table 6 summarises the symbols that have been used in the appraisal of the Local Plan to show the significance of likely effects arising from the Local Plan.

Table 6: Key symbols used in the appraisal

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

Table 7: Screening of Local Plan policies for potential to impact SA objectives

| SA objectives → | | | | | | | | | | | | | | | | | | |
|---------------------------|----------|-----------|-------------|-------------------|-------------|------------|----------------|-------------------|-----------|------------------|--------------|-----------|-----------|-----------------|-----------------|-------------------|------------------|------------------|
| Local Plan Policies ↓ | 1. Crime | 2. Health | 3. Services | 4. Infrastructure | 5. Equality | 6. Housing | 7. Liveability | 8. Built Heritage | 9. Travel | 10. Biodiversity | 11. C.Change | 12. Water | 13. Waste | 14. Air quality | 15. Ed & Skills | 16. Local economy | 17. Regeneration | 18. Worklessness |
| D1: Monitoring | | | | | | | | | | | | | | | | | | |
| D2: Presumption | | | | | | | | | | | | | | | | | | |
| D3: Infrastructure | | | | | | | | | | | | | | | | | | |
| D4: Obligations | | | | | | | | | | | | | | | | | | |
| D5: Enforcement | | | | | | | | | | | | | | | | | | |
| H1: Housing growth | | | | | | | | | | | | | | | | | | |
| H2: Affordable housing | | | | | | | | | | | | | | | | | | |
| H3: Existing housing | | | | | | | | | | | | | | | | | | |
| H4: Housing mix | | | | | | | | | | | | | | | | | | |
| H5: Housing standards | | | | | | | | | | | | | | | | | | |
| H6: Housing conversions | | | | | | | | | | | | | | | | | | |
| H7: Student housing | | | | | | | | | | | | | | | | | | |
| H8: Specific comm. needs | | | | | | | | | | | | | | | | | | |
| H9: Hostels and HMOs | | | | | | | | | | | | | | | | | | |
| H10: Gypsy & Traveller | | | | | | | | | | | | | | | | | | |
| ED1: KIBAs | | | | | | | | | | | | | | | | | | |
| ED2: Outside KIBAs | | | | | | | | | | | | | | | | | | |
| ED3: Large scale offices | | | | | | | | | | | | | | | | | | |
| ED4: Work-live devmt | | | | | | | | | | | | | | | | | | |
| ED5: Railway arches | | | | | | | | | | | | | | | | | | |
| ED6: Town centres | | | | | | | | | | | | | | | | | | |
| ED7: Night time economy | | | | | | | | | | | | | | | | | | |
| ED 8: Public Houses | | | | | | | | | | | | | | | | | | |
| ED9: A2 uses | | | | | | | | | | | | | | | | | | |
| ED10: Local centres and | | | | | | | | | | | | | | | | | | |
| ED11: Visitor attractions | | | | | | | | | | | | | | | | | | |
| ED12: Hotels... | | | | | | | | | | | | | | | | | | |
| ED13: Markets | | | | | | | | | | | | | | | | | | |
| ED14: Employ. & | | | | | | | | | | | | | | | | | | |
| SI1: Existing comm. | | | | | | | | | | | | | | | | | | |
| SI2: New comm. facilities | | | | | | | | | | | | | | | | | | |
| SI3: Schools | | | | | | | | | | | | | | | | | | |
| T1: Sustainable travel | | | | | | | | | | | | | | | | | | |
| T2: Walking | | | | | | | | | | | | | | | | | | |
| T3: Cycling | | | | | | | | | | | | | | | | | | |
| T4: Public transport | | | | | | | | | | | | | | | | | | |
| T5: River transport | | | | | | | | | | | | | | | | | | |
| T6: Assessing impacts | | | | | | | | | | | | | | | | | | |
| T7: Parking | | | | | | | | | | | | | | | | | | |
| T8: Servicing | | | | | | | | | | | | | | | | | | |
| T9: Mini-cabs, taxis etc | | | | | | | | | | | | | | | | | | |
| T10: Telecommunications | | | | | | | | | | | | | | | | | | |
| EN1: Open space | | | | | | | | | | | | | | | | | | |

Sustainability Appraisal on Lambeth Local Plan Proposed Submission
October 2013

| SA objectives → | | | | | | | | | | | | | | | | | | |
|-------------------------------|----------|-----------|-------------|-------------------|-------------|------------|----------------|-------------------|-----------|------------------|--------------|-----------|-----------|-----------------|-----------------|-------------------|------------------|------------------|
| Local Plan Policies ↓ | 1. Crime | 2. Health | 3. Services | 4. Infrastructure | 5. Equality | 6. Housing | 7. Liveability | 8. Built Heritage | 9. Travel | 10. Biodiversity | 11. C.Change | 12. Water | 13. Waste | 14. Air quality | 15. Ed & Skills | 16. Local economy | 17. Regeneration | 18. Worklessness |
| EN2: Food growing | | | | | | | | | | | | | | | | | | |
| EN3: Low carbon & energy | | | | | | | | | | | | | | | | | | |
| EN4: Sust design & constr | | | | | | | | | | | | | | | | | | |
| EN5: Flood risk | | | | | | | | | | | | | | | | | | |
| EN6: SUDs & water | | | | | | | | | | | | | | | | | | |
| EN7: Sust waste mgmt | | | | | | | | | | | | | | | | | | |
| Q1: Inclusive environments | | | | | | | | | | | | | | | | | | |
| Q2: Amenity | | | | | | | | | | | | | | | | | | |
| Q3: Comm safety / Crime | | | | | | | | | | | | | | | | | | |
| Q4: Public art | | | | | | | | | | | | | | | | | | |
| Q5: Local distinctiveness | | | | | | | | | | | | | | | | | | |
| Q6: Urban design public realm | | | | | | | | | | | | | | | | | | |
| Q7: Urban design new | | | | | | | | | | | | | | | | | | |
| Q8: Design quality | | | | | | | | | | | | | | | | | | |
| Q9: Landscaping | | | | | | | | | | | | | | | | | | |
| Q10: Trees | | | | | | | | | | | | | | | | | | |
| Q11: Alts and extensions | | | | | | | | | | | | | | | | | | |
| Q12: Refuse / recycling | | | | | | | | | | | | | | | | | | |
| Q13: Cycle storage | | | | | | | | | | | | | | | | | | |
| Q14: Devmt in gardens | | | | | | | | | | | | | | | | | | |
| Q15: Boundary treatments | | | | | | | | | | | | | | | | | | |
| Q16: Shop fronts/signage | | | | | | | | | | | | | | | | | | |
| Q17: Advertisements | | | | | | | | | | | | | | | | | | |
| Q18: Historic Env Strategy | | | | | | | | | | | | | | | | | | |
| Q19: Westminster WHS | | | | | | | | | | | | | | | | | | |
| Q20: Stat listed buildings | | | | | | | | | | | | | | | | | | |
| Q21: Registered parks... | | | | | | | | | | | | | | | | | | |
| Q22: Conservation Areas | | | | | | | | | | | | | | | | | | |
| Q23: Undesignated heritage | | | | | | | | | | | | | | | | | | |
| Q24: River Thames | | | | | | | | | | | | | | | | | | |
| Q25: Views | | | | | | | | | | | | | | | | | | |
| Q26: Tall and large buildings | | | | | | | | | | | | | | | | | | |
| PN1: Waterloo | | | | | | | | | | | | | | | | | | |
| PN2: Vauxhall | | | | | | | | | | | | | | | | | | |
| PN3: Brixton | | | | | | | | | | | | | | | | | | |
| PN4: Streatham | | | | | | | | | | | | | | | | | | |
| PN5: Clapham | | | | | | | | | | | | | | | | | | |
| PN6: Stockwell | | | | | | | | | | | | | | | | | | |
| PN7: West Norwood | | | | | | | | | | | | | | | | | | |
| PN8: Kennington / Oval | | | | | | | | | | | | | | | | | | |
| PN9: Herne Hill | | | | | | | | | | | | | | | | | | |
| PN10: Loughborough | | | | | | | | | | | | | | | | | | |
| PN11: Upper Norwood | | | | | | | | | | | | | | | | | | |

5C1 CRIME

5C1.1 This section of the SA relates to the sustainability performance of the Local Plan against:

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

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

Relevant policy objectives

National Level

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

5C1.4 '*Safer Places - The Planning System & Crime Prevention*' 2004 is a guide that encourages greater attention to the principles of crime prevention and to the attributes of safer places.

5C1.5 With reference to crime, the *National Planning Policy Framework, 2012* states that planning policies should aim to ensure that developments create safe and accessible environment where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

Regional Level

5C1.6 *London Plan 2011* policy 7.3 states that development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. The policy provides guidance on designing out crime.

Baseline conditions and existing issues

5C1.7 Overall, average crime rates within Lambeth are higher than both the England and London averages. Therefore this needs to be addressed, and regeneration in the Borough provides good opportunity to reduce crime and fear of crime.

5C1.8 Total Notifiable Offences (TNOs) fell for eight successive years between 2001 and 2009. Even following a small rise in 2009/10, TNOs were still more than 30% below the figure for 2000. Most crime categories mirrored this level of reduction: burglary falling by more than 48%, robbery by more than 39%, theft offences by 36% and criminal damage by nearly 44% (*Safer Lambeth Strategic Assessment 2011*).

5C1.9 At December 2010 Lambeth had the second highest volume of TNOs in our nearest neighbouring family of similar boroughs, behind Southwark. The comparative rate of offending (calculated as the number of offences per 1000 of the population) shows Lambeth to have the eighth highest level of its fifteen most similar boroughs. The 5

most prolific crime categories within those offences were Theft and Handling, Violence against the person, Criminal damage, Burglary and Drugs (Safer Lambeth Strategic Assessment 2011).

5C1.10 Table 8 shows most recent crime statistics for Lambeth to March 2013. For the financial year 2012/13 total number of crimes decreased by 6.2 percent. Of particular interest, residential burglary fell by 8.2%. However, some crime saw an increase (for example non-residential burglary, domestic crime and racist/religious hate crime) but this may be due to better confidence in reporting from victims of crime and slightly different classification methods used by the Police (MET 2013).

Table 8: Lambeth Crime Statistics

| Number of Offences | fy 2013 to March (ytd) | | fy 2012 to March (ytd) | |
|-------------------------------------|------------------------|---------------|------------------------|---------------|
| | Lambeth | Met Total | Lambeth | Met Total |
| Total Crimes | 34,841 | 770,220 | 37,138 | 815,443 |
| Homicide | 6 | 106 | 9 | 103 |
| Violence Against the Person (Total) | 6,827 | 149,654 | 7,144 | 153,884 |
| Rape | 161 | 3,042 | 180 | 3,342 |
| Other Sexual | 318 | 6,632 | 334 | 6,816 |
| Robbery (Total) | 2,625 | 34,764 | 3,099 | 38,914 |
| Robbery (Person) | 2,434 | 32,354 | 2,895 | 36,155 |
| Robbery (Business) | 191 | 2,410 | 204 | 2,759 |
| Burglary (Total) | 3,750 | 92,644 | 3,772 | 96,224 |
| Burglary Residential | 2,575 | 60,675 | 2,805 | 63,822 |
| Burglary Non-Residential | 1,175 | 31,969 | 967 | 32,402 |
| Gun Crime | 132 | 1,913 | 217 | 2,404 |
| Motor Vehicle Crime | 3,348 | 90,055 | 3,690 | 99,540 |
| Domestic Crime | 1,863 | 48,897 | 1,778 | 46,401 |
| Racist & Religious Hate Crime | 387 | 9,419 | 386 | 8,226 |
| Homophobic Crime | 103 | 1,103 | 143 | 1,264 |
| Anti-Semitic Crime | 2 | 181 | 0 | 168 |
| Islamophobic Crime | 11 | 343 | 14 | 292 |

5C1.11 A recent survey found that 69% of residents feel safe when outside in the area they live after dark, up from 54% in November 2009. Only 44% of young people report

feeling safe after dark. Empty and abandoned housing attracts crime and nuisance issues and contributes to the fear of crime (Housing Strategy 2012). The most recent residents' survey (2012) identified 'safer communities' as one of their three top priorities for the Borough.

- 5C1.12 Although crime has reduced considerably in the Borough, gang and gun related crime still remains a concern in Lambeth with recent police estimates stating at least 27 gangs functioning. Gangs are predominately located in the poorest neighbourhoods in the Borough which typically are the large social housing estates such as Stockwell Gardens, Myatts Field, Angell Town and particularly Tulse Hill Estate (Housing Strategy 2012).

Likely future evolution without the plan

- 5C1.13 People's perception of crime is a key issue for Lambeth (residents survey 2012) and significant efforts need to be made toward improving the Boroughs overall image as a clean and safe place to work, visit and reside within. Crime is a complex issue that involves multiple lifestyle and socio-economic factors. Addressing these is the target of other organisations, most notably the police and education sectors. Therefore, crime rates may reduce somewhat without the Local Plan.

- 5C1.14 However, the built environment will remain, and this is how the Local Plan can play an instrumental role in reducing crime and fear of crime: by designing and planning out crime, opportunity for crime and fear of crime. In absence of the Local Plan, London Plan policies encourage developers to incorporate 'designing out crime' tool but borough wide specific improvement opportunities to shared space, communal areas, public realm may not be fully realised to reduce crime and fear of crime most effectively.

Assessment of Policies

- 5C1.15 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 1, crime. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.

- 5C1.16 The following policies have been screened as having potential for significant effects on this objective.

| | |
|---|---|
| D1 – Delivery and monitoring | T2 – Walking |
| D2 – Presumption in favour of sustainable development | T3 – Cycling |
| D3 – Infrastructure | T4 – Public transport infrastructure |
| D4 – Planning obligations | T5 – River transport |
| H1 – Maximising housing growth | T6 – Assessing impacts of development on transport capacity |
| H3 – Safeguarding existing housing | T7 – Parking |
| H5 – Housing standards | T9 – Mini-cabs, taxis and private hire vehicles |
| ED5 – Railway arches | EN1 – Open Space |
| ED7 – Night-time economy and food and drink uses | Q3 – Community Safety |
| ED8 – Public Houses | Q6 – Urban design / public realm |
| ED9 – A2 uses | Q7 – Urban design / new development |
| SI1 – Safeguarding existing community facilities | Q12 – Refuse / recycling storage |
| SI2 – New or improved community facilities | Q13 – Cycle storage |
| SI3 – Schools | Q15 – Boundary treatments |
| T1 – Sustainable travel | Q16 – Shop fronts and signage |
| | PN1 – Waterloo |
| | PN2 – Vauxhall |

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

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

Delivery policies D1 – D4

5C1.17 Policies D1- D4 will contribute towards the attainment of SA Objective 1 through working with a range of partners (including police), delivering regeneration defined in Opportunity Area Planning Frameworks and local areas master-plans, including maximising use of vacant buildings (which can attract anti-social behaviour and create intimidating environments increasing fear of crime). The Council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth. Section 106 and CIL funding will provide or fund local improvements including those to public realm on community safety, walking and cycling improvements and social infrastructure that all work to reduce crime and fear of crime. Overall, it is considered these policies should result in significant positive effects with regards to SA Objective 1.

Housing policies H1, H3, H5

5C1.18 A direct effect of Policy H1 maximising housing growth is that increased housing will likely result in increased population growth in the Borough. More people may increase the likelihood of more crime or the reporting of more crime. Planning policy tools such as CPTED (Crime Prevention through Environmental Design) and 'Safer by Design' can 'design out' crime, and there are other proposed policies that will mitigate the effects of population growth in the aim of reducing and preventing crime and fear of crime. The Local Plan also supports proposals that would bring back into use long term empty homes and derelict empty homes which helps to create safer communities and reduce crime and disorder as derelict homes and properties can contribute to unsafe environments that attract anti-social behaviour and increase fear of crime. The Housing standards policy makes reference to safety and surveillance by stating that communal amenity space should be overlooked by habitable rooms. This has dual benefit of creating a safer environment for children to play in, and also discouraging unsavoury loitering that contributes to fear of crime and unsafe environments, particularly in housing estates or other communal spaces.

Economic and town centre policies ED5 – ED9

5C1.19 Left unmanaged railway arches, in particular those that are isolated and/or outside major, district and local centres, can become disused environments that may attract loitering and anti-social behaviour. Policy ED5 seeks to make efficient use of railway arches, and applications affecting arches will need to improve the immediate environment including safety and lighting which will help to reduce opportunity for crime and fear of crime. Town centre policies are likely to reduce and prevent crime and fear of crime by keeping people occupied and with a sense of purpose.

5C1.20 Evening economy uses include food and drink uses, night clubs, live music and/or dance venues and other entertainment activities and if not managed appropriately can result in a fear of crime, increased crime and/or antisocial behaviour. Policy ED7 seeks to avoid unacceptable harm to community safety and amenity of neighbouring residential areas and sensitive uses caused by evening and food and drink uses and thus positively contributes to SA Objective 1. The policy has been amended in response to previous SA recommendation 1 (referring to unacceptable harm to community safety, adverse impacts, and amenity of neighbouring residential areas rather than just adjoining properties) and so now more effectively meets SA Objective 1. The supporting text now also provides guidance on what 'sensitive uses' includes as a result of previous SA work.

5C1.21 In addition to evening economy uses some town centre uses such as betting shops can also exacerbate crime or loitering. Policy ED9 seeks to manage effects of such uses on amenity and crime levels. It is considered that policy ED9 will result in significant positive effects on SA Objective 1 particularly in improving the environment to address fear of crime.

Social Infrastructure policies S1, S2, S3

5C1.22 It is considered that policies S1, S2 and S3 will result in positive effects with regards to SA Objective 1 as these policies seek to safeguard existing, and provide new community premises which includes health care, youth centres. Retaining and providing new sports, recreation and education facilities also contributes to providing people, in particular youth, with opportunities to engage in sport and education which can reduce opportunities to engage in antisocial behaviour and in contrast promote more social cohesion. Proposals for schools will need to include travel plans and take into account road danger reduction measures and this effectively meets targets set out in Table 4.

Transport policies T1 – T7, T9

5C1.23 Policies T1 – T7 will likely result in positive effects in terms of SA Objective 1 as they seek to provide a safer road and traffic environment through use of sustainable travel, and promotion of walking and cycling. Policy T1 provides a road user hierarchy whereby walking and cycling are priorities, and private vehicles are at the bottom of the hierarchy. Walking and cycling will be made safer in the Borough through policies T2 and T3 in particular, and policy T2 seeks to replace existing subways, which can be areas that can feel unsafe to some people. Policies T1, T2 (walking) and T3 (cycling) also make specific mention of reducing road danger concerns which positively contribute to SA objective 1.

5C1.24 Policy T5 river transport makes provision for new piers or improvements to existing piers for transport or leisure uses. The policy has been amended in light of previous SA recommendations and now includes reference to safety in terms of maintenance, management and access. This contributes to achievement of SA Objective 1.

5C1.25 Policy T6 is on assessing impacts of development on transport capacity and infrastructure and makes good provision for safety with respect to SA Objective 1.

5C1.26 Given motor vehicle crime is quite high in the Borough (compared with other types of crime) it is considered appropriate that outdoor and open parking areas are well lit and monitored by CCTV where possible. This was recommended in the previous SA; the policy response was that policy Q3 will address this. Policy T3 (c) provides for secure cycle parking.

5C1.27 While policy T9 on mini-cabs, taxis and private hire vehicles does not directly reduce the need for motorised travel; it does reduce the need for private vehicle ownership, and also plays a role in providing safe transport options at night time. Therefore it is considered that policy 9 positively contributes to attaining SA Objective 1.

Open Space

5C1.28 Policy EN1 seeks to protect, maintain and improve open spaces (including access). This could lead to a reduction in crime levels by facilitating more activity in these spaces. The policy also states that green corridors are created for safe pedestrian and cyclist access.

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

- 5C1.29 The quality of the built environment policies listed above, in particular policy Q3 community safety, are the design policies most pertinent in achieving SA Objective 1. Policy Q3 is likely to result in significant positive effects in designing out crime and anti-social behaviour and addressing terrorism in terms of design and resilience. Previous SA recommendation 7 to incorporate 'fear of crime' into the policy has been accepted by the Council and this strengthens the policy with respect to positively attaining SA Objective 1. This amendment more robustly addresses fear of crime arising from solid roller shutters, and security bars on windows and doors (identified in the supporting text as negative design responses). It is noted that policy Q16 states that design for shop fronts should 'not have solid or perforated roller shutters or exposed, externally mounted shutter housings'. However this applies to shop fronts only and the recent amendment means the policy Q3 applies to the wider environment not falling within the ambit of 'shop fronts'.
- 5C1.30 Policies Q6 and Q7 provide for the urban design of the public realm and new developments. Overall, it is considered that these policies support the attainment of SA Objective 1 and will likely result in significant positive effects. The SA recommendation to replace the word 'adjoining' with 'adjacent' to policy Q8 has been included and this provides for a more safer environment in that vehicular access, parking and servicing is designed to be well related to the surrounding area, including across the road, rather than limited to areas that are immediately next to or share a common boundary. It is noted that passive surveillance is difficult in under-crofts and as such, should be discouraged where possible.
- 5C1.31 Policy Q13 on cycle storage states that cycle storage should be secure and safe to use which will result in positive effects on SA Objective 1. In response to previous SA recommendation 10, the policy has been improved so that it applies to all development, including employment and education uses as well as residential ensuring that all cycle storage is secure and safe to use.
- 5C1.32 It is considered that policies Q15 and Q16 will result in positive effects on SA Objective 1, in particular, a reduced fear of crime. Policy Q16 states that front boundaries in non-residential areas should be open in character rather than solid (increasing visibility and passive surveillance), and solid or perforated roller shutters or exposed, externally mounted shutter housings are not supported for shop fronts. Over time, this will result in feelings of a safer, more attractive environment, and improved visual amenity, thereby contributing to attainment of SA Objective 1.
- Places and neighbourhoods policies PN1 – PN10**
- 5C1.33 In combination with other Local Plan policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN10) should result in positive effects in relation to SA Objective 1. These policies generally seek to provide vitalised, viable mixed use centres that increase activity, reduce the need to travel, and respect and enhance local character. The policies include improvements to public realm and transport infrastructure. Policy PN5 on Clapham has been improved with more emphasis on improved environments for pedestrians and cyclists and improved linkages through the town centre and across the high street rather than 'improved vehicle movements' which is in response to previous SA recommendation. It is considered this policy amendment better achieves SA Objective 1, and more appropriately respects the road user hierarchy outlined in policy T1.
- 5C1.34 Recommendation 14 of previous SA work has been incorporated into policies PN6 Stockwell and PN8 Kennington/Oval which now enables an improved environment for cyclists as well as pedestrians. This change to policy should improve traffic and

environmental conditions for cyclists as well to help ensure safer communities. Policy PN8 has also been amended to reflect proximity to Oval Gasometers and development proposals are to consider Health and Safety measures.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C1.35 All sites in Table 10 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 1.

Table 9: Significance criteria for SA Objective 1: Crime

| Positive | Negative |
|--|--|
| Contributes positively to: <ul style="list-style-type: none">• Mixed use developments• Designing out crime• Modal shift away from private car• Includes measures to adapt to climate change | Poor urban design, promotes mono-use developments and car use. Does not promote safe design. |

TABLE 10: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 1: CRIME

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|---|--|---|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | <ul style="list-style-type: none"> - The site is currently part vacant and underdeveloped so the identified preferred use for the expansion of St Thomas's Hospital and replacement of affordable housing brings the site into use again thereby improving amenity of the area and reducing fear of crime. - Retaining Upper Marsh as a through route, providing views through gaps between buildings and fronting onto and creating a clear pattern of streets is considered good mechanisms to design out crime, in addition to relevant Local Plan policies which will also apply to the site. | <ul style="list-style-type: none"> - No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. - Retention of 10 Royal Street and Holy Trinity Urban Centre for their conservation values may prove challenging in adapting to climate change. | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies. |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | <ul style="list-style-type: none"> - Emergency and delivery vehicles to have safe access to the site, segregated from pedestrians - Current site has a vacant two storey building so bringing site back into use will reduce crime and any perceptions of crime. - Rooftop play space / MUGA to be suitably enclosed. | <ul style="list-style-type: none"> - Preferred use of site is single use for Education - School children (as well as pedestrians) should not normally have access to emergency vehicle access and delivery / service areas - No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies. |
| 3 | Vale Street Depot, Vale Street SE27 | <ul style="list-style-type: none"> - Preferred use is for education use or housing, retention of the reuse and recycling centre. - Rooftop play space / MUGA to be suitably enclosed. | <ul style="list-style-type: none"> - No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. - Potential safety issues for children with dual use of site as education and reuse /recycling centre which may result in high traffic movements to and from the site during all hours of the day. - Public transport accessibility is very poor and therefore may result in increased vehicle movements for drop off and pick up at school. | <ul style="list-style-type: none"> - Early integrated design is recommended for the two different uses to avoid safety issues of the two different land uses on the one site. - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> - possible mixed use development (education and residential) | | <ul style="list-style-type: none"> - Site specific flood risk |

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|---|---|---|---|---|
| | | <ul style="list-style-type: none"> - modal shift away from private car through sustainable travel through a school travel plan and very good PTAL - high quality design and appearance | | <p>assessment has been carried out as part of the SFRA.</p> <p>- Compliance with other relevant Local Plan policies</p> |
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> - Replacement of a bland 1960s building with mixed use development comprising of office led development, ground floor active frontage uses, residential, and new public open space together with increased permeability to Waterloo Station, improved pedestrian links, streetscape improvements should positively contribute to attaining SA Objective 1. - Public transport accessibility is exceptional | <ul style="list-style-type: none"> - No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 6 | Shell Centre, 2-8 York Road SE1 | <ul style="list-style-type: none"> - Mixed use employment led development comprising of office, residential including affordable housing, active ground floor frontage uses (retail, cultural, sport, leisure and community facilities including replacement of police facility) together with public realm improvements, improved pedestrian links to Waterloo Station, clear routes and use of shared spaces should positively contribute to attaining SA Objective 1. - Public transport accessibility is exceptional | <ul style="list-style-type: none"> - No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 7 | Waterloo Station, Waterloo Road SE1 | <ul style="list-style-type: none"> - Redevelopment of Waterloo Station seeks to increase capacity which will contribute to climate change adaptation - Mixed use development of the station comprising of ground floor active uses, retail, office and a new city square provides passive surveillance and increased activity to the rail station and will seek to achieve SA Objective 1. - It is considered that the proposed design principles for the site will result in positive effects on SA Objective 1. - Penetration of natural light to concourse level is an effective climate change adaptation measure. - Public transport accessibility is exceptional | | <ul style="list-style-type: none"> - Compliance with other relevant Local Plan policies |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | <ul style="list-style-type: none"> - Mixed use development and improvements for cyclists and pedestrians should result in positive effects with respect to SA Objective 1 - Public transport accessibility is exceptional | <ul style="list-style-type: none"> - Potential safety issues for people and surrounding area if replacement bus garage is provided on the site along with mixed use residential and ground floor active uses | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. |

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|----|--|--|---|---|
| | | | - No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | - Compliance with other relevant Local Plan policies |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | <ul style="list-style-type: none"> - Mix of uses including B1 offices, residential, actives frontages at ground floor - exceptional PTAL rating - high quality design - includes measures to adapt to climate change – connection to CHP | Excluding CHP no other direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | <ul style="list-style-type: none"> - Mix of uses: residential, employment and operational fire station proposed - Public transport accessibility is exceptional - Design features including protection of views, internal publically accessible square should result in positive effects on SA Objective 1. | - No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |

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|----|---|--|---|---|
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | <ul style="list-style-type: none"> - Preferred use is mixed use development with active frontages at ground floor levels, employment with residential on upper levels, and potential location for a new primary school. - Design features such as dual aspect residential units in block adjacent to the railway viaduct, access route along the viaduct, permeability for pedestrians and cyclists and views between buildings will result in significant positive effects in terms of SA Objective 1. - Public transport accessibility is exceptional | <ul style="list-style-type: none"> - No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | <ul style="list-style-type: none"> - Preferred use for the site is town centre led mixed use development with employment, community uses and residential on the upper floors with a new linear square connecting through the site and the re-provision of a hostel. - Design features such as dual aspect residential units and improved pedestrian and cycling links and permeability for increased surveillance and simplified road junctions will result in significant positive effects in terms of SA Objective 1. - Public transport accessibility is exceptional | <ul style="list-style-type: none"> - No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | <ul style="list-style-type: none"> - Preferred use is town centre led mixed use development centred on Bondway and the existing bus station. New High Street proposed onto Bondway with active non-retail uses on Wandsworth Road frontage and residential on the upper floors together with new public realm linkages, pedestrian and cycle improvements will likely result in significant positive effects on SA Objective 1 - Public transport accessibility is exceptional - New open spaces and public square proposed. | <ul style="list-style-type: none"> - Flood risk area | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 14 | Somerleyton Road SW9 | <ul style="list-style-type: none"> - Mixed use development - design features including significant gaps between buildings | <ul style="list-style-type: none"> Flood risk area | <ul style="list-style-type: none"> - Site specific flood risk assessment has been |

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|----|--|---|---|---|
| | | to give views across the site, overlooking, and dual aspect all work to result in significant positive effects on SA Objective 1 - the line of plane tree on the grass verge are to be protected with provided climate change adaptation benefits. - Public transport accessibility ranges from moderate to exceptional | | carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 15 | Popes Road SW9 | - Mixed use development preferred use - Design features included to design out crime - Public transport accessibility is exceptional | - Preferred use is to include town centre car parking -No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 16 | Brixton Central (between the viaducts) SW9 | - Wide ranging mixed use development preferred (including market support centre, creative and cultural industries hub, recreation uses as well as improvements to Brixton station) - Design features to improve access and permeability through the site - Public transport accessibility is exceptional | -No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 17 | 'Your New Town Hall' SW2 | - Mixed use development to include civic uses with outdoor space, additional community facilities, retail, residential and employment floorspace - Public transport accessibility is exceptional | No direct or specific design principles or key development considerations that would support measures to adapt to climate change have been provided (such as landscaping, trees) although a Site specific flood risk assessment has been carried out as part of the SFRA. | - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 18 | 286 - 362 Norwood Road SE27 | - Retail led mixed use development - Public transport accessibility is very good - design features include permeability and linkages through the site that can design out crime - provision for a CCHP local energy network within the development | | - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |

Summary of Local Plan policies and site allocations

5C1.36 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan policies and site allocations will have a significant positive effect on existing baseline conditions related to crime and fear of crime.

Table 11: Assessment of effects of Local Plan on Crime objective

| Assessment of effects of Local Plan on SA objective 1 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|---|-------|---|---|------------------------|
| Ensuring safe communities with reduced crime and disorder | ++ | <p>Safety and crime are influenced by a wide range of factors, many of which are beyond the remit of a Local Plan. However, to the extent that local planning policy can play a part, it is considered that overall the proposed Local Plan will have significant positive effects on the crime objective. This is because of the design controls for developments (such as Secured by Design, and discouragement of roller shutters on shop fronts), rejuvenation and encouragement of activity in town centres, mixed use developments, provision of improved safety for cyclists and pedestrians including improved routes and recognition of sufficient social infrastructure to accommodate the projected growth of population.</p> <p>Most site allocations promote mixed use development which will help increase activity during day and night resulting in passive surveillance and helping reduce levels of crime and fear of crime. The allocations also promote and encourage development on currently underused or vacant sites in some cases.</p> <p>Overall it is considered that the preferred uses and design principles outlined for the 18 sites in the Borough will also result in significant positive effects in terms of SA Objective 1.</p> | <p>Safety measures and crime prevention through environmental design is a well recognised and effective planning tool for addressing crime prevalence and opportunity. Therefore, in so far as planning can control, it is likely that there will be reduced crime, and fear of crime as a result of appropriate design measures being incorporated into developments. The majority of significant positive effects are likely to be evident in the medium to long term as development is delivered and occupied.</p> | Permanent |

Recommendations for monitoring likely significant effects

5C1.37 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

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

5C2 GOOD HEALTH AND REDUCED HEALTH INEQUALITIES

5C2.1 This section of the SA relates to the sustainability performance of the Local Plan against:

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

5C2.2 The term health inequalities is defined by the UK Government as 'inequalities in respect of life expectancy or general state of health which are wholly or partly a result of differences in respect of general health determinants' (GLA Act 2007). For example, those with low socioeconomic status, certain ethnic groups, particular geographical areas, and those with disabilities may have worse health than others. Simply put, it is the uneven distribution of good health.

5C2.3 To achieve objective 2, plan policies should protect health and wellbeing; reduce poverty including child poverty; reduce health inequalities; improve mental, emotional and physical health and wellbeing; encourage the development of healthy neighbourhoods; and make walking and cycling more attractive relative to other alternatives.

Relevant policy objectives

National Level

5C2.4 *National Planning Policy Framework 2012* sets out a range of policies that influence good health and health inequalities, including building a strong competitive economy, sustainable transport, wide choice of high quality homes, and conserving and enhancing the natural and historic environments.

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

5C2.6 The recent Local Government Group guide – *Plugging health into planning: evidence and practice 2011* provides practitioners with guidance and evidence on integrating health and spatial planning. The guide covers a range of areas including resident health inequality, obesity road traffic fatalities and injuries, improving mental health and wellbeing as well as practical case studies from around England.

Regional Level

5C2.7 The policies in the London Plan seek to address the main health issues facing the capital, including mental health, obesity, cardio-vascular and respiratory diseases by seeking to ensure new developments are designed, constructed and managed in ways that improve health and reduce health inequalities.

5C2.8 The *Best Practice Guidance on Health Issues in Planning 2007* shows how health inequalities can be tackled through planning policies and proposals, as well as through better partnership working between health and development planning sectors. It defines health as being influenced by many factors. It is not only linked to age, gender and ethnicity, but to wider factors such as education, employment, income, housing, social networks, air and water quality, access to affordable nutritious food, and access to social and public services, including health and social

care. Planners and development professionals should consider health in its broadest sense, including social and psychological elements such as wellbeing and fulfilment, which can be positively influenced by the spatial planning processes.

- 5C2.9 *Mayor's Health Inequalities Strategy 2010*. In 2010 the Mayor committed to making childhood obesity his number one priority. This Strategy sets out the Mayor's vision for tackling health inequalities in London and calls partners to action - from NHS, businesses and boroughs, to communities and academics. The strategy aims to improve the well-being of all Londoners and narrow the gap between those with the best and worst health.
- 5C2.10 *Lambeth Cooperative Health and Well-being Strategy – A transitional Strategy for 2013-14*. In April 2013, a new duty came into effect requiring local authorities and NHS Clinical Commissioning Groups to prepare a joint health and wellbeing strategy through their Health and Wellbeing Board (HWB). This draft strategy sets out the commitment of Lambeth's Health Wellbeing Board to go beyond the minimum national requirement to create a co-operative strategy that catalyses a new transformational way of working.
- 5C2.11 *Lambeth Older Persons Housing Strategy (2012)*. The Strategy sets out the vision and strategic outcomes for older people living in Lambeth. The Strategy describes the means to which council will help people, as they grow older, to live well, independently and in a way they choose by delivering on a number of specific outcomes in partnership with citizens and key stakeholders.

Baseline conditions and existing issues

- 5C2.12 Excess winter deaths are defined by the Office for National Statistics as the difference between the number of deaths during the four winter months (December to March) and the average number of deaths during the preceding autumn (August to November) and the following summer (April to July).

Table 12: Excess Winter Deaths (EWD) in Lambeth

| | England | | London | | Lambeth | |
|---------|---------|------------|--------|-----------|---------|-----------|
| | EWD | EWD Index* | EWD | EWD Index | EWD | EWD Index |
| 2004/05 | 29740 | 19.6% | 3440 | 20.4% | 67 | 12.34% |
| 2005/06 | 23740 | 15.8% | 2560 | 15.6% | 110 | 22.31% |
| 2006/07 | 22380 | 15.2% | 2070 | 13% | 55 | 11.32% |
| 2007/08 | 23290 | 15.7% | 2730 | 17.4% | 64 | 13.01% |
| 2008/09 | 34200 | 23.7% | 3800 | 25% | 188 | 42.8% |

[Source: ONS mortality file]

*EWD Index is excess winter deaths as a proportion of average number of deaths for the period

- 5C2.13 Lambeth fares comparatively worse for health inequalities when compared nationally. Healthy lifestyle issues are still an area of concern (e.g. high smoking prevalence, worsening obesity levels related to poor diets and lack of physical activity, alcohol and drug misuse and child obesity).

- 5C2.14 Lambeth male life expectancy is 77 years compared to the England average of 78.5 years, and Lambeth female life expectancy is 81 year compared to England average of 82.5 years (Lambeth and Southwark Public Health Directorate 2012).
- 5C2.15 Coronary heart disease, malignant cancers and respiratory diseases remain the top three causes of death in the Lambeth population (NHS 2012). Hypertension, diabetes, chronic obstructive pulmonary disease and severe mental illness are also major long term conditions impacting health of Lambeth residents. Socio-economic challenges such as unemployment and poor housing result in high rates of child poverty, and social exclusion which subsequently results in poor physical and mental health are indicators of health inequality (Lambeth and Southwark Public Health Directorate 2012).
- 5C2.16 The summary of public health priorities are summarised annually through a 'red box' where health priorities are presented with regard to their 'high burden' and 'low burden' as understood through various indices. These priorities are further sub-divided into those that are improving and those that are worsening. The quadrant chart which includes the 'red box' presents indicators based on these criteria (see Figure 1).
- 5C2.17 The 2011 census found that 6.1% of Lambeth residents say their day-to-day activities are limited a lot by long term health problems or disabilities; and a further 6.6% say there day to day activities are limited a little. These figures are both less than those for Inner London and London as a whole. Lambeth is in the top 10% of districts for places where people say they are in a very good health (53%)(Census 2011).

Lambeth - Red box (2011)

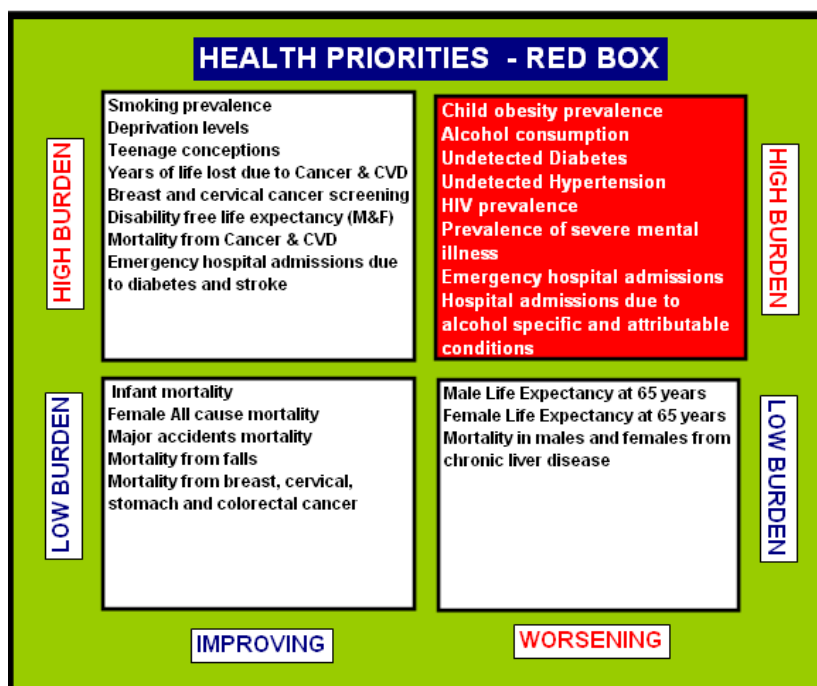


Figure 1: Lambeth Red Box Lambeth and Southwark Public Health Directorate 2012

- 5C2.18 Most recently, Public Health England released in October 2013 local authority health profiles, using 32 indicators to give a wide-ranging snapshot of public health and its wider determinants. Lambeth is significantly better than England in 10 indicators,

mostly in adult and children’s health. It is significantly worse than England in 15 indicators, mostly in life expectancy, causes of death and community deprivation. Lambeth has the highest rate of acute sexually transmitted infections in England.

| Significantly better than England | Significantly worse than England |
|--|--|
| GCSE achieved (5A*-C inc. Eng & Maths) | Deprivation |
| Smoking in pregnancy | Proportion of children in poverty |
| Starting breast feeding | Statutory homelessness |
| Alcohol-specific hospital stays (under 18) | Violent crime |
| Healthy eating adults | Long term unemployment |
| Physically active adults | Obese Children (Year 6) |
| Obese adults | Teenage pregnancy (under 18) |
| Incidence of malignant melanoma | Acute sexually transmitted infections |
| Hospital stays for self-harm | Life expectancy – male |
| People diagnosed with diabetes | Life expectancy – female |
| | Infant deaths |
| | Smoking related deaths |
| | Early deaths: heart disease and stroke |
| | Early deaths: cancer |
| | Road injuries and deaths |

[Source: Lambeth and Southwark Public Health Directorate, October 2013]

Likely future evolution without the Plan

- 5C2.19 The government commissioned review (‘Fair Society, Healthy Lives’ published in February 2010) by Michael Marmot has a number of recommendations on health inequalities. One recommendation is that delivering policy objectives on health will require action by central and local government, the NHS, the third and private sectors and community groups.
- 5C2.20 National policies will not work without effective local delivery systems focused on health equity in all policies. If there was no Local Plan document for Lambeth, reliance would fall on policies within the London Plan.
- 5C2.21 London Plan policy on health inequality appeals for Boroughs in their LDF preparation to ensure that the health inequalities impact of development is taken into account in light of the Mayor’s Best Practice Guidance on Health Issues in Planning.
- 5C2.22 The Marmot review also makes the recommendation that local delivery systems should be focused on health equity in all policies.
- 5C2.23 In summary health is a complex issue and involves multiple lifestyle and socio-economic factors. Addressing these is the target of many other plans and strategies of competent and experienced organisations. Therefore, such factors and inequalities may improve without the Local Plan. However, planning has an important role to play by ensuring that development does not exacerbate health inequalities, but results in an improved environment for everyone. Health inequalities will continue to exist without local intervention and the improvement of people’s quality of life (for example warmer homes and more efficient to heat reducing fuel poverty, access to local jobs, encouraging walking and cycling, limiting hot food takeaways near schools, planning for health infrastructure and improved access to open space and nature).

Assessment of Policies

- 5C2.24 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 2, Health. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on

the objective. This review takes account of mitigation already included within the Plan.

5C2.25 Health is a complex matter and as such, a wide range of factors, relationships and conditions can influence good health and reduce health inequalities. Therefore it is considered that a broad range of policies within the Local Plan may impact on the attainment of improving conditions and services that engender good health and reduce health inequalities. The following policies have been screened as having potential for significant effects on this objective:

| | |
|---|---|
| D1 – Delivery and monitoring | T4 – Public transport infrastructure |
| D2 – Presumption in favour of sustainable development | T5 – River transport |
| D3 – Infrastructure | T6 – Assessing impacts of development on transport capacity |
| D4 – Planning obligations | T10 – Telecommunications |
| H1 – Maximising housing delivery | EN1 – Open Space |
| H2 – Delivering affordable housing | EN2 – Local food growing and production |
| H3 – Safeguarding existing housing | EN3 – Low carbon and energy |
| H4 – Housing mix in new developments | EN4 – Sustainable design and construction |
| H5 – Housing standards | EN5 – Flood risk |
| H6 – House conversions | EN7 – Sustainable waste management |
| H7 – Student housing | Q1 – Inclusive environments |
| H8 – Housing to meet specific community needs | Q2 – Amenity |
| H9 – Hostels and houses in multiple occupation | Q3 – Community Safety |
| H10 – Gypsy and Traveller needs | Q9 – Landscaping |
| ED1 – KIBAs | Q10 – Trees |
| ED2 – Business uses outside KIBAs | Q13 – Cycle storage |
| ED3 – Large Offices | Q14 – Development in gardens |
| ED6 – Town centres | Q24 – River Thames |
| ED7 – Evening economy and food and drink uses | Q25 – Views |
| ED8 – Public Houses | PN1 – Waterloo |
| ED9 – A2 uses | PN2 – Vauxhall |
| ED13 – Markets | PN3 – Brixton |
| ED14 – Employment and training | PN4 – Streatham |
| S11 – Safeguarding existing community facilities | PN5 – Clapham |
| S12 – New or improved community facilities | PN6 – Stockwell |
| T1 – Sustainable travel | PN7 – West Norwood |
| T2 – Walking | PN8 – Kennington / Oval |
| T3 – Cycling | PN9 – Herne Hill |
| | PN10 Loughborough Junction |
| | PN11 Upper Norwood |

Delivery and monitoring policies D1 – D4

5C2.26 Policies D1- D4 will contribute towards the attainment of SA Objective 2 through working with a range of partners (including Lambeth and Southwark Public Health Directorate), delivering regeneration defined in Opportunity Area Planning Frameworks and local areas master-plans, including promotion and maintenance of mixed, balanced and diverse communities, and accessible, child friendly environments. The Council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth and this will benefit health of the Borough. Section 106 funding will provide or fund local improvements such as those to public realm for community safety, walking and cycling improvements, social infrastructure, access to employment opportunities, access to facilities, local food production and growing which each on their own and cumulatively, will likely result in significant positive effects on health and well being in the Borough.

Housing policies H1 – H10

5C2.27 Research shows the links between housing quality, better welfare and reduced costs to society (Ambrose 2002). Following assessment of policies; it is considered that

overall the Housing policies (coupled with other relevant policies such as quality of built environment and environment policies) will generally have significant positive effects on the achievement of SA Objective 2. Provision and safeguarding of housing, including affordable housing and estate renewal / regeneration will contribute to improved mental, emotional and physical health and wellbeing for some residents of the borough, particularly more vulnerable groups. The policy should enable greater share of income for access to nutritious food, healthcare and other essentials that promote good health. Residential stability reduces the stress and disruptions associated with frequent or unwanted moves. Affordable housing should be located in areas with good public transport, access to fresh food and local shops, and other community services and facilities. The mix and design required by the residential policies seek to provide and safeguard family sized housing (reducing risk of overcrowding and possible consequential health impacts such as infectious diseases, stress, parasites), provide adequate internal and outdoor space, and provide housing to meet specific community needs to help house more vulnerable people of society. Policies require these types of housing developments as well as hostels and houses in multiple occupation to be suitable for intended users and accessible to public transport, shops, services, community facilities and social networks, all of which will likely result in significant positive effects on SA Objective 2.

- 5C2.28 Policy H5 expects dwellings to be 'designed and built to Lifetime Homes standard and ensure 10 percent of units are wheelchair accessible...' To maximise benefits to SA Objective 2 (and also SA Objectives 3 and 5), it has been recommended in previous SA that this be amended so that *at least* 10 percent are wheelchair accessible. However, it is noted the Council response to this is that the policy reflects the wording in the London Plan (ref. Policy 3.8 Housing Choice and para. 3.48). In response to previous SA recommendation, dual aspect accommodation is expected unless exceptional circumstances are demonstrated. This is likely to result in increased health benefits for residents of the borough.
- 5C2.29 The provision of Lifetime Homes standard enables people to continue to live in their home throughout different stages of their life, including as they become older and more frail. Older people living in large family sized homes may be limited in their opportunity to convert their house to smaller units by policy H6 (house conversions). As a result of this there may be instances where older people cannot continue to live in that same house. However, policy H4 (housing mix) should provide opportunity for people to downsize their home while still remaining in the same community if they so wish. Student housing should be affordable for intended uses. The policy addresses this and should help avoid overcrowding issues and associated impacts. Overcrowding is particularly high amongst social rented housing and has increased in private rented housing (Replacement London Plan IIA 2009). Increase of housing in Lambeth is likely to help alleviate this.
- 5C2.30 Policy H5 also provides for external amenity space. Houses, ground floor flats and family sized units should preferably have direct access to a private garden which provides positive effects in terms of SA Objective 2. It is considered that more positive effects on health will likely result if new houses had 30m² each of private external amenity space. The policy provides criteria for communal amenity space and it is considered that some of the criteria (such as receiving natural light and being screened from parking areas) would be beneficial for all external amenity space, regardless of whether it is communal or not. It is considered that provision of a communal garden would likely result in more positive health benefits than hard paved areas as green spaces have been proven to contribute to improved mental health and safe green space can also reduce family aggression (Lambeth and Southwark Public Health Directorate 2012). There would also be benefits for local biodiversity

(SA Objective 10). The policy touches upon this by stating that communal amenity space should promote biodiversity and where appropriate food growing. The policy provides for children's play space where developments have potential occupancy of ten or more children, which will provide opportunity for outdoor physical activity for children (a contribution to addressing obesity and sedentary lifestyles) provided these are safe and accessible environments. Good quality housing and play space can be linked to the home learning environment and ultimately educational attainment.

SA Recommendation: That external amenity space receives natural light and is screened from parking areas.

Council response: the list of criteria relating to the design of communal amenity spaces is only really applicable to shared spaces (as opposed to private gardens).

SA Recommendation: Requiring at least 30m² of private external amenity space is likely to result in more positive effects for health and wellbeing.

Council response: Agreed – this change has been made to policy H5(b)(i).

5C2.31 ***Economic development policies ED1 – ED3, ED6 – ED10, ED13, ED14***
It is considered that one of the biggest influences on peoples health is employment. The Local Plan has a number of policies which either directly or indirectly seek to improve the economy of the Borough, get residents working and thereby create conditions that improve health and reduce inequality. Employment has a strong bearing and effect on mental health (NHS 2012). The provision of a range of employment opportunities help ensure people have access to suitable employment and are likely to remain healthier by having steady income. Economic development policies (ED1 – ED3 in particular) seek to safeguard existing business use / employment generating land, and this will likely result in positive effects on mental health and wellbeing of local residents as it helps to improve access to local jobs for local people. Improved vitality and viability of town centres (policy ED6) should also result in positive effects on mental health and wellbeing, through employment opportunities, access to services and facilities, and sense of place. In response to previous SA recommendations revised policy ED6 now encourages new residential development on appropriate sites in town centres, thereby further maximising positive effects for health through for example access to jobs, services and facilities, access to healthy food, reduced need for travel. Controlling the number of betting shops, pawn brokers and money shops can also provide benefits for improved health by avoiding negative impacts on vitality and viability of town centres and the secondary effects on health and enjoyment of place this may create. Policy ED14 on employment and training seeks to reduce unemployment in the Borough by supporting job opportunities and apprenticeships associated with major developments in the Borough, and provision of employment and training schemes. It is considered that these policies are likely to generate positive secondary effects in relation to health and sense of community identity and civic participation.

5C2.32 Policies support the vitality and viability of town centres including shopping, leisure, food and drink, markets and entertainment which all help to maintain community spirit and social interaction and offer local employment opportunities, improving mental and emotional health and wellbeing. Policy ED7 (evening economy and food and drink uses) protects amenity of residential areas and sensitive uses, and impacts on community safety from adverse impacts arising from evening economy (e.g. noise and nuisance). It limits these uses to town centres and the Lower Marsh/The Cut Central Activities Zone frontage. The policy also states that proposals for hot food

takeaways (A5 uses) will not be supported if proposed within 400m of the boundary of a primary or secondary school. In response to previous SA recommendation, the hot food takeaway policy has been amended to apply across the Borough, including in town centres. This should have positive effects in terms of reducing childhood obesity. However, it does not address other fast food eating establishments that can contribute to obesity but do not fall within A5 use class (such as A3 uses like McDonalds or KFC restaurant; or sale of fast food donuts, ice cream or other unhealthy food (A1)); but it is accepted that using the term “fast food” in the Local Plan would be open to interpretation – and the Council could not (and would not wish to) control the sale of particular food items (e.g. donuts and ice-creams) from A1 or A3 premises.

5C2.33 Protection of public houses (policy ED8) can contribute to positive health through their role in social interaction, local community life, sense of place and provision of local employment. In so far as planning policy can influence; it is considered that these benefits outweigh any negative effects to resident’s health that may arise through alcoholism and binge drinking. These negative effects can also arise through sale of alcohol from A1 retail units, of which specific consumer goods are not within the control of planning policy.

5C2.34 Policy ED13 on markets provides opportunity for sale of fresh fruit and vegetables and likely increases the accessibility to affordable nutritious and varied foods.

Social infrastructure policies S1 and S2

5C2.35 Significant positive effects are likely to result from policies S1 (Safeguarding existing community premises) and S2 (New or improved community premises). These policies make provision for community facilities which include D1 and D2 use classes as well as other public service uses such as fire, ambulance, policing, and community safety facilities, all of which are necessary components to a healthy borough. Where new provision is proposed these will be conveniently located and accessible for their intended use, and (in response to previous SA recommendation) easily reached by foot, cycling or public transport thereby seeking to reduce health inequalities. Ideally, social infrastructure should be located where there is an identified need that helps reduce health inequalities. Previous SA recommendation sought for this to be more explicitly provided for in the policy (in order to better address baseline conditions of community facilities being unevenly spread across the Borough with some neighbourhoods experiencing severe shortages or useable space, while others have under-used facilities); however it is accepted that this ultimately rests with infrastructure providers, and there are identified projects in the Infrastructure Schedule.

5C2.36 Expansion of St Thomas’s Hospital as outlined in Site Allocation 2 should also result in significant positive effects for health in the Borough.

Transport and communications policies T1 – T6 and T10

5C2.37 It is considered that policies T1, T2 and T3 will likely result in significant positive effects as these policies minimise the need to travel, reduce dependence on the private car and provide attractive and useable environments conducive for safe walking and cycling. These policies should help reduce congestion, air pollution, and encourage more active travel and therefore contribute to improved health (mental and physical) of the Borough. There is strong evidence that reductions in traffic to reduce air pollution are successful in improving health. Equally however, it is recognised that increased population growth is expected over the plan period, and if there is an associated increase in number of vehicles in the Borough, effects on air

quality may not be favourable. Policy T2 on walking has been improved in response of previous SA recommendations to ensure walking routes are safe, and in addition the policy has been strengthened to support improvements that encourage additional walking trips. This positively contributes to attainment of SA objective 2 and the targets set out in Table 4 of this SA. Similarly policy T3 has been improved by previous SA recommendation so secure and *covered* cycle parking facilities are provided and showers, changing facilities and lockers are provided 'appropriate to the number of cycle parking provided'. It is recognised however that until a critical mass of cyclists is achieved, there will be potential for accidents – behaviour of all road users, especially private and commercial vehicles must improve (HIA on draft London Plan 2009), although it is equally recognised that safety features strongly in the policies.

- 5C2.38 Improvements to public transport infrastructure (policy T4) are proposed to address both public transport accessibility and capacity and therefore, if and when delivered, will result in positive effects in terms of SA Objective 2 by improving access to other services and facilities and employment which will contribute to improved mental, emotional and physical health and wellbeing, as well as reduce poverty. Any improvements or new public transport infrastructure will also need to be designed to be safe, convenient and accessible for use especially by disabled, children and cyclists.
- 5C2.39 Policy T5 River transport contains provision for access to the River Thames which can provide a good walking, running and cycling route, as well as mental health benefits associated with access to water and open space. Supporting text paragraph 8.18 has been strengthened to ensure any new development / addition to the riverside walk should join existing riverside walk to provide a continuous route along the river (in response to previous SA recommendation).
- 5C2.40 Under policy T6, applications will be supported where they do not have unacceptable transport impacts including cumulative impacts on highway safety; traffic generation, impact on traffic flows and local parking; congestion and other transport modes. Reference to the environment and amenity of an area through air quality, noise and disturbance has been removed from the policy as provided for in the draft Local Plan. Planning applications should not be supported where transport impacts associated with the development result in adverse air quality, noise and disturbance as this is likely to have a negative effect on health and well being. In terms of SA Objective 2, and also other SA Objectives, such as SA Objectives 7, 8 11 and 14; it is strongly recommended that reference to the environment is reinstated to the policy.
- 5C2.41 Health considerations have been included in policy T10 on telecommunications as there will need to be compliance with the International Commission on Non-Ionising Radiation Protection guidelines.

SA Recommendation: including 'the environment or amenity of an area through air quality, noise and disturbance' as a criterion of policy T6(a) will mitigate adverse impacts on health.

Council response: Policy T6 is on Transport Assessments. Transport Assessments, as technical studies, do not necessarily look at wider environmental impacts. The results of the TA would be looked at in the wider context of an EIA or Environmental Statement accompanying a planning application and would provide the technical information on the transport impacts alone. Policy Q2 should address the recommendation.

Environment and open space policies EN1 – EN4 and EN7

5C2.42 Policy EN1 will result in positive effects on SA Objective 2 as it seeks to protect open spaces and require major developments in areas of open space deficiency to provide on-site open space or make financial contribution to enable new open space or improvement to accessibility and quality of existing public open space. Access to green and open spaces is essential for physical and mental health. Improvement of such spaces will also encourage increased use of spaces, making them feel safer and attractive places.

A lack of access to affordable and nutritious food is a contributor to poor health (IIA 2009). Policy EN2 enables access to healthy food through encouraging new allotments, orchards and local food growing spaces and production. In response to previous SA recommendation, the policy widens provision of this from major residential development to also include buildings and other open space areas where it does not conflict with other policy objectives. This could include some D1 use class and other social infrastructure and accordingly will likely result in increased positive effects in terms of SA Objective 2.

5C2.43 Overall it is considered that Policy EN3 on low carbon and renewable energy will result in positive health effects as it seeks to ensure carbon emission targets as set out in the London Plan are met, and the mayor's energy hierarchy of be lean, be clean and be green is respected. Be lean measures in particular can be effective at combating fuel poverty as these relate to passive design measures (including orientation and site layout, natural ventilation and lighting, thermal mass and solar shading), active design measures (including high efficacy lighting and efficient mechanical ventilation with heat recovery), as well as how well the building is built (such as U – values and air tightness). It is technically possible to exceed Building Regulation requirements (Part L) through demand reduction measures (i.e. be lean) alone.

5C2.44 Sustainable design and construction highlights the mental health benefits of providing sustainable housing that at the same time contributes to health, for example, by providing good natural light and ventilation. Policy EN4 requires the highest standards of sustainable design and construction feasible. The intent of this policy should result in positive health benefits from improved building environments (i.e. reduce fuel poverty and illness related to damp conditions, draughts such as respiratory diseases and winter deaths). In response to previous SA recommendations the policy has been improved to maximise health benefits in terms of SA Objective 2, but also improved the outcomes for other such as SA Objectives 6 (Housing), 7 (Liveability), 8 (Built Environment), 11 (Climate Change), 12 (Water Resources), 13 (Waste) and 14 (Air Quality) by increasing the standards expected under the Code for Sustainable Homes, and BREEAM assessment tools. Supporting text now also includes reference to achievement of the Civil Engineering Environmental Quality Assessment and Awards Scheme (CEEQUAL) Excellent rating helping to ensure the highest standards of sustainable design and construction are delivered for public realm, highways and other physical infrastructure.

5C2.45 Policy EN4 also makes provision for living walls and roofs. This will contribute to health benefits by insulating buildings during winters and keeping buildings cool during hotter temperatures, and bringing nature closer to people. Promotion of urban greening, particularly green roofs, can have a positive indirect effect on mental health by providing access to private gardens and improving the physical appearance of an area. Contaminated land requires adequate remedial treatment before development can commence which positively protects health of future occupiers / users of land.

5C2.46 Policies EN5 Flood Risk and EN7 waste management should result in positive effects on SA Objective 2. Evidence suggests adults who experience flooding in their homes are at risk of psychological distress. Measures to mitigate flood risk are part of building community resilience. Policy EN5 seeks to mitigate effects of flooding.

5C2.47 **Quality and Built Environment policies Q1 – Q3, Q9, Q10, Q12 - Q14, Q24, Q25**
Overall it is considered that the design policies will result in significant positive effects on the health of the Borough, particularly as these seek to protect amenity, including privacy, daylight and sunlight, mitigating noise, disturbance and other adverse effects that can impact on mental, emotional and physical health and wellbeing. Amendments to policy Q2 Amenity have been made in response to previous SA recommendations to ensure acceptable standards of privacy, and adequate outlooks are provided as well as improved provision of daylight and sunlight levels.

5C2.48 In response to previous SA Recommendation policy Q24 has been amended to ensure a continuous riverside walkway is provided, thereby resulting in increased benefits in terms of SA Objective 2.

5C2.49 Planting of new trees and increased greenery through policies Q9 and Q10 help reduce the heat island effect and will cool ambient air temperatures. Additionally, green infrastructure helps improve air quality by filtering particulates (notably PM10). This is likely to help those with respiratory conditions. Furthermore, it is recognised that contact with trees and vegetation can help alleviate stress, which will be beneficial for people's health (Replacement London Plan IIA 2009).

5C2.50 Policy Q12 on refuse and recycling storage may benefit from referencing 'public health' although this is encapsulated in clause vi (be secure and safe). The Council may wish to consider amending clause (a) as follows: 'In order to protect visual and residential amenity and public health the council will expect all refuse and recycling storage to:...'

5C2.51 Policy Q13 seeks to ensure that cycle storage areas are incorporated into developments and made as accessible as possible which helps to increase cycling levels and improve outcomes with regards to SA Objective 2.

Recommendation: add reference to public health in policy Q12.

Council response: Agreed – this change has been made to policy Q12(a).

5C2.52 **Places and Neighbourhoods Policies PN1 – PN11**
In combination with other Local Plan policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN11) should result in significant positive effects in relation to SA Objective 2. In particular policy PN 1 on Waterloo will result in significant positive effects with the creation of a new primary care centre in the wider Waterloo area, as well as support for development strategies associated with St Thomas's Hospital and Kings College. New or refurbished health facilities are included in policy PN2 Vauxhall, acknowledges the current gap in provision, particularly with projected population growth in the area. The Clapham policy seeks to control the number of food and drink uses in the town centre which should result in more positive health impacts in terms of mental health and well being for residents who are affected adversely by evening economy effects (such as anti-social behaviour, noise). The policy also does not permit any more hot food takeaways in the area which may have some positive impact on the physical health of local

residents, although more positive impact is likely to come from increased feelings of sense and pride of place (from better control of evening uses). Most of the places and neighbourhood policies seek to provide safer environment for pedestrians and cyclists which positively contributes to attainment of SA Objective 2. There is strong evidence that suggests interventions to change traffic conditions (such as cutting speed limits) reduce road accidents, and that reductions in traffic to reduce air pollution are successful in improving health. Policies PN1, PN2, PN3, PN4 and PN7 promote mixed use developments and tall buildings. High rise residential tower blocks do not necessarily create neighbourliness and are not good for all residents. Literature suggests high rises are less satisfactory than other housing, in particular for children, as social relations are more impersonal, increased fear of crime and may contribute to suicides. High rise housing is more satisfactory for residents when they are more expensive and people have chosen to live there. Concentrations of high rise office accommodation in mixed use residential schemes has the potential to leave space empty for parts of the week which may isolate residents from local services and amenities as well as social interaction. An appropriate balance between uses will need to be achieved to avoid adverse impacts on health and wellbeing. Positively previous SA recommendation to require Health Impact Assessment for all major developments in the Borough has been taken on board.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C2.53 All sites in Table 14 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 2.

Table 13: Significance criteria for SA Objective 2: Health

| Positive | Negative |
|--|--|
| <ul style="list-style-type: none"> • Positive contribution to key determinants of health like decent housing, jobs, good air quality, reduced crime. • Site specific allocations: no identified air quality or noise issues. • Promotes good access to health services. • Site specific housing allocations: located within 30 minutes travelling time of GP surgeries and hospitals. • Tackles poverty and social exclusion. • Promotes active travel (walking and cycling) and healthy lifestyles. | <ul style="list-style-type: none"> • Negative contribution to key determinants of health like decent housing, jobs, good air quality, reduced crime. • Site specific allocations: identified air quality or noise issues. • Worsens access to health services. • Site specific housing allocations: located more than 30 minutes travelling time of GP surgeries and hospitals. • Worsens poverty and social exclusion. • Promotes unsustainable travel patterns (like private car use) and dispersed uses. • May worsen road safety. |

TABLE 14: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 2: HEALTH

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|--|--|---|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | <ul style="list-style-type: none"> - Preferred use for the site is health use for expansion of St Thomas's Hospital to provide clinical and ancillary hospital uses, and replacement of affordable housing - Public transport accessibility is exceptional and the site contributes positively to active travel and healthy lifestyles | <ul style="list-style-type: none"> - the site abuts railway tracks so there may be some noise effects - within a flood zone 3 | <ul style="list-style-type: none"> - redesign of the site should take into account the railway tracks and the use of the site and associated needs - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | <ul style="list-style-type: none"> - relatively good levels of public transport accessibility -preferred use is for education use which will reduce need to travel for nearby parents and students - tackles social exclusion (allowing children to attend a school in their local area) | <ul style="list-style-type: none"> - As the front part of the site is a former petrol station there may be contaminated soils and/or materials on the site - site is within 400m of Brixton Town Centre boundary (policy ED9 would not apply as currently worded) -within flood zone 1 | <ul style="list-style-type: none"> - Appropriate measures to avoid any adverse health effects associated with former use of the site as a petrol station. - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 3 | Vale Street Depot, Vale Street SE27 | <ul style="list-style-type: none"> - preferred use of site is education or housing with retention of the reuse and recycling centre - tackles social exclusion (allowing children to attend a school in their local area) - policy seeks to protect amenity of neighbouring residents - seeks to remediate any land contamination issues | <ul style="list-style-type: none"> - public transport accessibility is very poor and may result in increased vehicle journeys by parents dropping kids off and/or picking them up from school - potential safety issues for children with dual use of site as education and reuse /recycling centre which may result in high traffic movements to and from the site during all hours of the day. | <ul style="list-style-type: none"> - Early integrated design is recommended for the two different uses to avoid safety issues of the two different land uses on the one site. - Compliance with other relevant Local Plan policies (e.g. travel plans, flood risk) - Site specific flood risk assessment has been carried out as part of the |

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| | | | | |
|---|---|---|---|--|
| | | | -within flood zone 1 | SFRA. |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> - very good levels of public transport accessibility -preferred use is for education use which will reduce need to travel for nearby parents and students - tackles social exclusion (allowing children to attend a school in their local area) - promotes sustainable travel - good access to health services - relationship between residential and schools uses acceptable in terms of design and function (and would address amenity concerns such as noise) | <ul style="list-style-type: none"> - school uses often involve increase car trips to the area for drop off and pick up -within flood zone 1 | <ul style="list-style-type: none"> -Travel plan implementation - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> - preferred use is positive contribution to key determinants of health as includes residential, and employment (office) promotes active travel - no identified air quality or noise issues - provision of a new city square - located within 30 minutes travelling time of a hospital - public transport accessibility level is exceptional - potential to tackle fuel poverty if connected to a future district wide heat and power network | -within flood zone 3 | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 6 | Shell Centre, 2-8 York Road SE1 | <ul style="list-style-type: none"> - preferred use is positive contribution to key determinants of health as includes affordable housing, sport and leisure, community facilities and employment (office) - public transport accessibility level is exceptional - located within 30 minutes travelling time of a hospital - no identified air quality or noise issues - potential to tackle fuel poverty if connected to a future district wide heat and power network | -within flood zone 3 | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 7 | Waterloo Station, Waterloo Road SE1 | <ul style="list-style-type: none"> - preferred use is positive contribution to key determinants of health as includes public transport improvements and employment - public transport accessibility level is exceptional - located within 30 minutes travelling time of a hospital - no identified air quality or noise issues - promotes active travel | -within flood zone 3 | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | <ul style="list-style-type: none"> - preferred use is positive contribution to key determinants of health as includes residential and commercial (employment) | - noise and disturbance issues may arise if the replacement bus | - Compliance with other Local Plan policies (in |

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|----|--|---|--|--|
| | | <ul style="list-style-type: none"> - public transport accessibility level is exceptional - located within 30 minutes travelling time of a hospital - potential to tackle fuel poverty if connected to a future district wide heat and power network | <p>garage is provided on-site along with residential and commercial activities</p> <p>-within flood zone 3</p> | <p>particular those addressing amenity)</p> <p>- Site specific flood risk assessment has been carried out as part of the SFRA.</p> |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | <ul style="list-style-type: none"> - preferred use is positive contribution to key determinants of health as includes residential and commercial (employment) - public transport accessibility level is exceptional - located within 30 minutes travelling time of a hospital - potential to tackle fuel poverty if connected to a future district wide heat and power network | <p>-within flood zone 3</p> | <p>- Site specific flood risk assessment has been carried out as part of the SFRA.</p> <p>- Compliance with other relevant Local Plan policies</p> |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | <ul style="list-style-type: none"> - preferred use is positive contribution to key determinants of health as includes residential and commercial (employment) - public transport accessibility level is exceptional - located within 30 minutes travelling time of a hospital - policy seeks to make sure that both existing and new residential amenity is protected and new dwellings are located away from the viaduct - potential to tackle fuel poverty if connected to a future district wide heat and power network - promotes active travel | <p>- noise and disturbance issues may arise with the retention of an operational fire station along with residential and commercial activities which can lead to adverse mental health and wellbeing</p> <p>-within flood zone 3</p> | <p>- Compliance with other Local Plan policies (in particular those addressing amenity)</p> <p>- Site specific flood risk assessment has been carried out as part of the SFRA.</p> |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | <ul style="list-style-type: none"> - preferred use is positive contribution to key determinants of health as includes residential and employment, with potential for new primary school - public transport accessibility level is exceptional - located within 30 minutes travelling time of a hospital - site allocation design principles protect the amenity of existing residential development and ensures amenity of new residential development is protected from the noise, pollution and vibration from the railway viaduct - promoted active travel and healthy lifestyles - tackles social exclusion (particularly if the primary school is delivered as it will enable children of Vauxhall area to attend a local school) - potential to tackle fuel poverty if connected to a future district wide | <p>- identified noise issues</p> <p>-within flood zone 3</p> | <p>- Compliance with other Local Plan policies (in particular those addressing amenity)</p> <p>- Site specific flood risk assessment has been carried out as part of the SFRA.</p> |

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|----|--|--|--|---|
| | | <p>heat and power network</p> <ul style="list-style-type: none"> - minimises impact on Wyvil Primary School – particularly in terms of traffic | | |
| 12 | <p>Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8</p> | <ul style="list-style-type: none"> -preferred use is positive contribution to key determinants of health as includes residential, community uses and employment - public transport accessibility level is exceptional - located within 30 minutes travelling time of a hospital - site allocation design principles protect the amenity of new residential development from the noise, pollution and vibration of the railway viaduct - promoted active travel and healthy lifestyles - potential to tackle fuel poverty if connected to a future district wide heat and power network | <ul style="list-style-type: none"> -within flood zone 3 | <ul style="list-style-type: none"> - Compliance with other Local Plan policies (in particular those addressing amenity) - Site specific flood risk assessment has been carried out as part of the SFRA. |
| 13 | <p>Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site)</p> | <ul style="list-style-type: none"> -preferred use is positive contribution to key determinants of health as includes town centre led development and residential, and employment - public transport accessibility level is exceptional - located within 30 minutes travelling time of a hospital - promoted active travel and healthy lifestyles - potential to tackle fuel poverty if connected to a future district wide heat and power network | <ul style="list-style-type: none"> - possible noise and pollution impacts on residential amenity in particular due to busy traffic junction -within flood zone 3 | <ul style="list-style-type: none"> - Compliance with other Local Plan policies (in particular those addressing amenity) - Site specific flood risk assessment has been carried out as part of the SFRA. |
| 14 | <p>Somerleyton Road SW9</p> | <ul style="list-style-type: none"> -preferred use is positive contribution to key determinants of health as includes residential, employment, community facilities, social enterprise and open space - tackles poverty and social exclusion - site allocation design principles protect amenity of existing residential developments and ensures any new dwellings are dual aspect - potential to tackle fuel poverty if connected to a future district wide heat and power network and through provision of living roofs | <ul style="list-style-type: none"> -within flood zone 1 | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 15 | <p>Popes Road SW9</p> | <ul style="list-style-type: none"> -preferred use is positive contribution to key determinants of health as includes residential, employment, community facilities, leisure and cycle parking - tackles poverty and social exclusion - located within 30 minutes travelling time of a hospital - promoted active travel and healthy lifestyles | <ul style="list-style-type: none"> - preferred use of site is to include a car park - associated air quality issues -within flood zone 1 | <ul style="list-style-type: none"> - Compliance with other relevant Local Plan policies - Site specific flood risk assessment has been carried out as part of the SFRA. |

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|----|--|--|---|---|
| 16 | Brixton Central (between the viaducts) SW9 | <ul style="list-style-type: none"> - provision of market, food and drink, community, leisure and recreation, retail uses for social inclusion and health benefits - public transport accessibility level is exceptional - located within 30 minutes travelling time of a hospital - promotes sustainable and active travel | <ul style="list-style-type: none"> - food and drink may not necessarily be healthy -within flood zone 1 | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 17 | 'Your New Town Hall' SW2 | <ul style="list-style-type: none"> -preferred use is positive contribution to key determinants of health as includes residential, employment, community facilities and civic uses - public transport accessibility level is exceptional - located within 30 minutes travelling time of a hospital - active travel provision | <ul style="list-style-type: none"> -within flood zone 1 | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |
| 18 | 286 - 362 Norwood Road SE27 | <ul style="list-style-type: none"> -preferred use is positive contribution to key determinants of health as includes residential, access to food (supermarket) community facilities, and some employment and new public square - public transport accessibility is very good - tackles poverty and social exclusion - potential to tackle fuel poverty if connected to a future district wide heat and power network - promotes sustainable transport | <ul style="list-style-type: none"> -within flood zone 1 | <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of the SFRA. - Compliance with other relevant Local Plan policies |

5C2.54

Summary of Local Plan policies and site allocations

Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives and, it is likely that the Local Plan will have a significant positive effect on the existing baseline and in improving conditions and services that engender good health and reduce health inequalities.

Table 15: Summary assessment of effects of Local Plan on health objective

| Assessment of effects of Local Plan on SA objective 2 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|---|-------|--|---|------------------------|
| Promoting a healthy borough with better healthcare services, reduced health inequalities and by reducing the causes of ill health | ++ | <p>Health is influenced by a wide range of factors, many of which are beyond the remit of a Local Plan. However, to the extent that local planning policy can play a part, it is considered that overall the proposed Local Plan will have significant positive effects on the health objective and existing baseline conditions, in particular addressing homelessness, overcrowding, mixed housing sizes, affordability and accessibility. Increased population growth over the plan period may result in increased vehicle movements and associated negative impacts on air quality. However, it is considered that policies seek to minimise private vehicle use and encourage sustainable travel modes. It is otherwise considered that the Local Plan policies will make a significant contribution to, and appropriately address, the sustainability issues pertinent to Health and Well Being (and Equalities and Accessibility) for the Borough outlined in Table 3.</p> <p>Generally, it is considered that the site allocations are well located to result in significant positive effects on health and wellbeing. Most allocations include public realm improvements which should help promote physical activity in areas. Issues affecting residential amenity have been identified arising from multifunctional use of sites (for example fire station, bus station) or proximity to railway viaduct. However, appropriate design and construction will mitigate such adverse effects on amenity. The sites proposed for new schools may increase vehicles journeys associated with school drop-off and pick up, although the school travel plan will address this.</p> | Improvements in terms of providing additional housing, attracting and supporting employment and business investment, enabling local provision of health services, access to open space and enabling open space in areas of current open space deficiency, and public transport improvements are only likely to be seen in the medium to long term. To reflect in actual health of residents will likely be a long term measure. | Permanent |

Recommendations for monitoring likely significant effects

5C2.55

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

- § Annually Updated Infrastructure Schedule
- § Life expectancy
- § Deaths from heart disease less than 75 years
- § Amount of unrestricted open space per 1000 population
- § Percentage of dwellings achieving Code for Sustainable Homes level 4 or higher and non-residential buildings achieving BREEAM Excellent
- § Percentage of homelessness in the Borough
- § Provision of childcare places per 1000 under 5's
- § New child play spaces created in completed residential developments
- § Child obesity levels.
- § Parks with Green Flag Awards

5C3 ACCESS AND SERVICES

5C3.1 This section of the SA relates to the sustainability performance of the Local Plan against:

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

5C3.2 To achieve this objective, plan policies should provide access for all regardless of age, gender, disability, race or faith to services jobs, leisure and amenities near to home and reducing the need to travel.

Relevant policy objectives

National Level

5C3.3 Accessibility is incorporated into a number of policies of the *National Plan Policy Framework 2012*. For example paragraph 38 states the large scale residential development should promote a mix of uses in order to undertake day-to-day activities including work on site. Key facilities such as primary schools and local shops should be located within walking distance of most properties where practical. Paragraph 35 makes reference to considering the needs of people with disabilities by all modes of transport.

Regional Level

5C3.4 A key theme of the *London Plan 2011* is that London and its infrastructure should be accessible and inclusive to all. A number of policies address accessibility. For example, policy 3.16 of the *London Plan (2011)* on social infrastructure states that facilities (such as education, health, leisure, community and places of worship) should be accessible to all sections of the community (including disabled and older people) and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged.

Local Level

5C3.5 The *Lambeth Local Implementation Plan 2011* includes a range of measures to improve accessibility, for example improving the walking and public realm environment for people with disabilities by introducing adequate dropped kerbs and tactile paving across the borough; removing redundant street furniture and obstructive bollards and rationalising the amount of street furniture across the borough; and re-lay crossovers and uneven paving.

Baseline conditions and existing issues

5C3.6 Similar to other inner London boroughs, Lambeth has a young age profile consisting of many working age people, rather than large numbers of children and teenagers (0-19 year olds represent 20.8% of the population and 53.6% of residents are aged 20-44 years). Lambeth is in the top five districts in the country for people in this age group (Census 2011). This large working age group is likely because Lambeth is a destination for many young working age migrants. Lambeth's older population (aged 60+) is projected to grow by 46% in the next 20 years (2011-31), compared to a 17% growth across the whole population (State of Borough 2011).

5C3.7 The number of those aged over 85 is expected to increase which will significantly increase age-related long term conditions and demand for care services. This

includes some people with enduring mental health needs who will become part of the ageing population, with particular housing needs (APH 07/08) (LIP 2011).

- 5C3.8 Table 16 below provides predicted numbers of disabled people in 2011 according to the Department of Health *PANSI* projections (State of the Borough 2011).

Table 16: Disabilities in Lambeth

| Description of disability | Lambeth no. | Lambeth % | London % |
|---|-------------|-----------|----------|
| Physical Disabilities (18-64 year olds) | | | |
| Moderate physical disability | 13,391 | 6.4 | 7.0 |
| Serious physical disability | 3,423 | 1.6 | 1.9 |
| Serious visual impairment | 137 | 0.1 | 1.9 |
| Moderate or severe hearing impairment | 5,082 | 2.4 | 3.0 |
| Profound hearing impairment or deaf | 38 | 0.0 | 0.0 |
| Males with a physical disability and permanently unable to work | 3,983 | 3.8 | 2.1 |
| Females with a physical disability and permanently unable to work | 2,577 | 2.4 | 1.4 |
| Mental Disabilities (18-64 year olds) | | | |
| Common mental disorder | 33,446 | 15.9 | 16.1 |
| Antisocial personality disorder | 761 | 0.4 | 0.4 |
| Psychotic disorder | 821 | 0.4 | 0.4 |

- 5C3.9 Section 4 and Table 3 of the Report provides detail on public transport accessibility in the Borough.

- 5C3.10 Under the Department for Transport 'Access for All' programme, lifts have been installed at Herne Hill, Streatham Common and Streatham Hill Railway stations. Lifts are also proposed at Vauxhall and Waterloo stations. Lift installation at Vauxhall station is due for completion in 2014. Lift installation at Waterloo station is unlikely during the LTP timeframe due to funding constraints.

- 5C3.11 The Lambeth resident's survey (2011) for disabled residents and those with long term illness found that similar to older people; there is a longer term trend of disabled residents being less likely to use all cultural services¹. Further research was undertaken to explore the reasons underlying this (which included not feeling welcome and comfortable in leisure centres, poor access and lack of awareness about available discounts).

- 5C3.12 There are 1.54 hectares of unrestricted open space in Lambeth per 1,000 population, although access is unevenly spread and particularly limited in the north of the borough. Lambeth contains two Areas of Deficiency for Access to Nature for London (AODs) covering approximately 40% of the borough (see Figure 2). Lambeth has two London Priority Opportunity Sites for reducing AODs (Kennington Park and Norwood Park), and five Priority Sites for improving access to nature (Archbishop's Park, Brockwell Park, Myatt's Fields Park, Rush Common, Waterloo Millennium Green).

- 5C3.13 Open space provision for residents in the Borough includes 228 open spaces within Lambeth above 0.2ha in size and 15 further sites in adjacent Boroughs, accessible to the population of Lambeth (Open Space Study 2013).

¹ Disabled residents are less likely to use leisure and sports facilities (20% vs 27%) and parks and open spaces (39% vs 55%). They are more likely to be concerned about not enough being done for older people (24% vs 11%), and less likely to be concerned about pollution of the environment (7% vs 10%) and public transport (3% vs 6%).

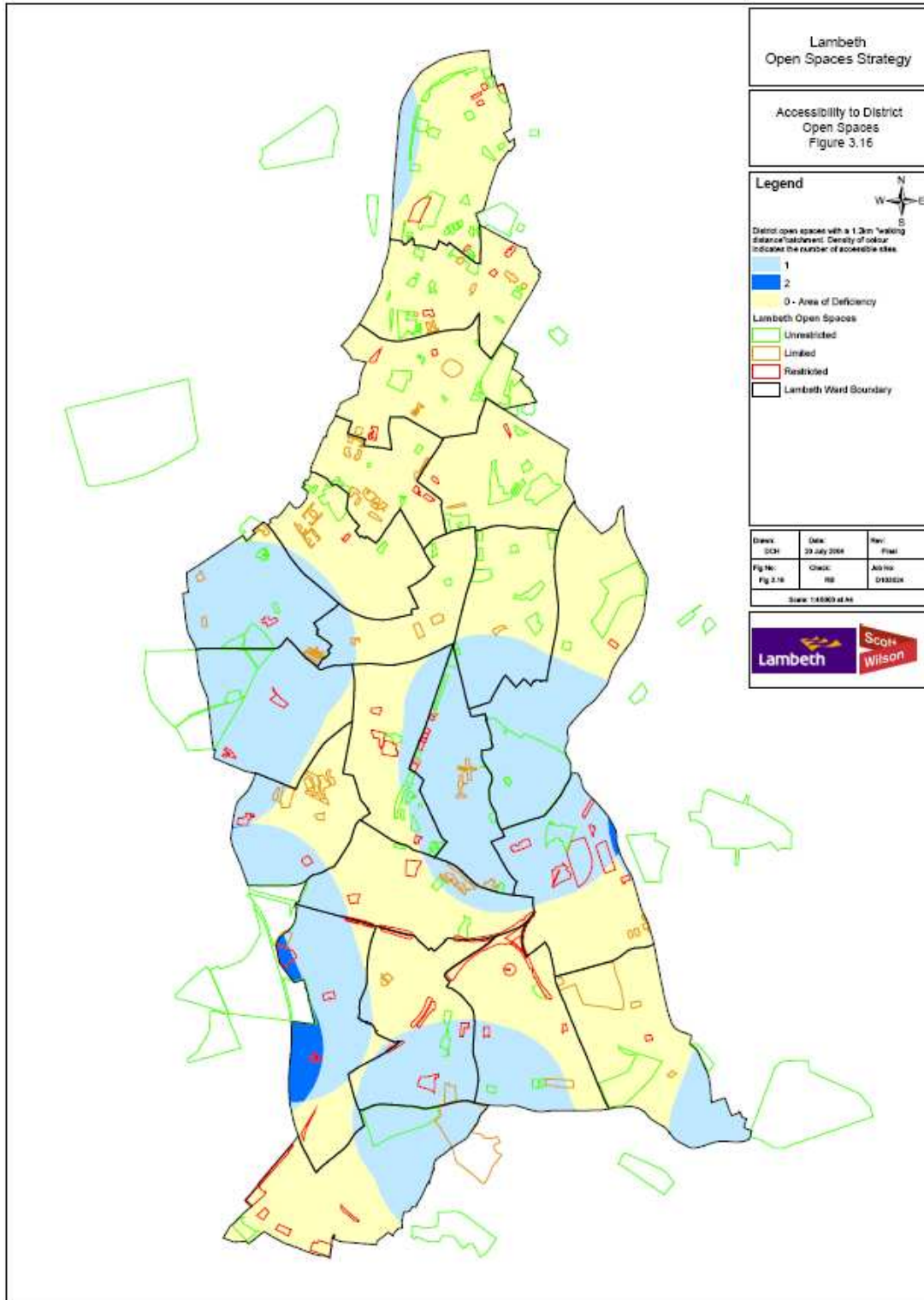


Figure 2: Areas of deficiency for access to nature

5C3.14

Lambeth currently offers a good range of play facilities but improvement to quality is required in some cases. A recent audit also highlighted geographical disparity in access to play across the borough, with a particular lack of facilities in the south of the Borough, in West Norwood and Streatham (Infrastructure Programmes 2010). As population increases, access to quality play provision will become an increasing priority across the Borough as a whole.

- 5C3.15 There is already a wide range of community facilities across Lambeth including parks, open spaces, play areas, allotments, Customer Centres, community centres, day care centres, nurseries, Children's Centres, youth centre, local schools with extended opening hours, faith buildings, libraries, leisure centres, pubs, cafes and local shops. However, coverage is currently unevenly spread across the Borough, with some neighbourhoods experiencing severe shortages of usable space, while others apparently have too many under-used facilities.
- 5C3.16 The number of school places in the Borough is currently insufficient to meet future demand, both at secondary and primary level. The Council has had to add additional temporary classrooms each year, which is an unsustainable position. More land and funding are required to build additional schools to meet projected future demand over the next ten years.

Likely evolution without the Plan

- 5C3.17 In the absence of the new Local Plan, reliance would be had on National and London Plan policies. However, there would be a high risk that local context would be lost and the focus on specific areas requiring improved accessibility (for example, improved transport accessibility east to west of the Borough, and school places) may diminish.

Assessment of Policies

- 5C3.18 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 3, access and services. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.

- 5C3.19 The following policies have been screened as having potential for significant effects on this objective:

| | |
|---|---|
| D1 – Delivery and monitoring | T1 – Sustainable travel |
| D2 – Presumption in favour of sustainable development | T2 – Walking |
| D3 – Infrastructure | T3 – Cycling |
| D4 – Planning obligations | T4 – Public transport infrastructure |
| H3 – Safeguarding existing housing | T5 – River transport |
| H2 – Delivering affordable housing | T6 – Assessing impacts of development on transport capacity |
| H5 – Housing standards | T7 – Parking |
| H6 – House conversions | T9 – Mini-cabs, taxis and private hire vehicles |
| H7 – Student housing | EN1 – Open Space |
| H8 – Housing to meet specific community needs | EN2 – Local food growing and production |
| H9 – Hostels and houses in multiple occupation | Q1 – Inclusive environments |
| H10 – Gypsy and Traveller needs | Q6 – Urban design / public realm |
| ED6 – Town centres | Q16 – Shop fronts and signage |
| ED7 – Evening economy and food and drink uses | Q24 – River Thames |
| ED8 – Public Houses | PN1 – Waterloo |
| ED10 – Local centres and dispersed local shops | PN2 – Vauxhall |
| ED12 – Hotels and other visitor accommodation | PN3 – Brixton |
| S11 – Safeguarding existing community facilities | PN4 – Streatham |
| S12 – New or improved community facilities | PN5 – Clapham |
| S13 – Schools | PN6 – Stockwell |
| | PN7 – West Norwood |
| | PN8 – Kennington / Oval |
| | PN9 – Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and monitoring policies D1 – D4

5C3.20 Policies D1- D4 will contribute towards the attainment of SA Objective 3 through working with a range of partners, delivering regeneration defined in Opportunity Area Planning Frameworks and local areas master-plans, including promotion and maintenance of mixed, balanced and diverse communities, ensuring maximum accessibility for disabled people and child friendly environments. The Council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth that result in inclusivity of the Borough. Section 106 funding will provide or fund local improvements to infrastructure, including access to facilities.

Housing policies H2, H3 and H5 – H10

5C3.21 It is considered that the housing policies will result in positive effects on SA Objective 3. Policy H2 seeks to provide affordable housing and policy H3 seeks to safeguard existing housing (including affordable), both of which seek to provide increased accessibility to housing. Policy H5 will likely result in significant positive effects as it makes provision for 'Lifetime Homes' and wheelchair accessible units which will allow older people to remain in their homes as their mobility and health changes. Increasing the percentage of wheelchair accessible homes would increase the likelihood of people being able to remain in their homes over a lifetime should they so wish and also increase accessibility to appropriate housing for elderly and people with disabilities, although it is recognised that the current 10% requirement derives from London Plan standards. Loss of residential units for nursery or childcare use seeks to ensure such uses are accessible to parents, thereby helping to enable parents into the workforce. Policy H5 also makes good provision for outdoor amenity space in residential developments and children's play space.

5C3.22 Policy H7 is on student housing and clause (a) (v) states that student housing should be 'located in an area with good public transport access, and easy access to local shops, workplaces, services and community facilities'. Previous SA recommendations have been accepted to strengthen this policy and ensure student housing is located in areas of PTAL 4 or more and within easy access to local services.

5C3.23 It is considered that policy H8 will result in significant positive effects for SA Objective 3. It aims to provide suitably designed and located housing options for vulnerable groups, and contribute to creating mixed, balanced and inclusive communities. The policy also ensures adequate provision for visitor / carer parking and the safe storage of wheelchairs and mobility scooters. Similarly, policy H9 seeks to be fully inclusive by providing for new hostels and houses in multiple occupations.

5C3.24 Previous SA recommendations to policies H8 and H9 have been accepted and now ensure that any loss of housing for specific groups and HMOs is re-provided elsewhere in the Borough. This will likely result in more positive effects for vulnerable groups, achieve housing targets and maintain housing for all needs in the Borough.

5C3.25 Policy H10 provides for gypsy and traveller needs. This policy aims to result in positive effects for this group and any new site identified would need to be situated 'within a reasonable distance of local shops, services and community facilities...and benefits from an appropriate level of public transport accessibility'. In response to previous SA recommendation, 'reasonable distance' has been defined as around 400 metres and is therefore likely to result in more positive effects in terms of SA Objective 3.

Economic Development policies ED6, ED7, ED10, ED12

5C3.26 Policy ED6 supports vitality and viability of Lambeth town centres including safeguarding local shops and other local services to meet community need within neighbourhoods. Evening and food and drink uses (policy ED7) accommodating pavements need to consider accessibility by arranging such use so as not to be a hazard to disabled and older people and families with small children, and stopping up of public highway will be resisted, especially in town centres. Policy ED10 seeks to support and protect local centres and local shops in meeting day to day needs of communities. Loss of local shops will only be supported where essential daily goods are within a reasonable walking distance, thereby seeking to maintain accessibility for all and reduce the need to travel. Policy ED12 on visitor accommodation is commended, particularly clause (b) on accessibility and inclusion; however use of the word 'should' is noted compared to clause (a) which uses the word 'must' and policy EN4 which states 'all development *will be required* to meet the highest standards of sustainable design and construction'. Replacing 'should' with 'must' or 'will be required' is likely to have a more positive effects on achieving SA Objective 3.

Recommendation: replacing the word 'should' with 'must' or 'will be required to' in policy ED12(b) will likely result in more positive effects than the current wording.

Council response: No change, the wording reflects the tone of London Plan policy.

Social Infrastructure policies S1 – S3

5C3.27 Overall it is considered that Policies S1 (safeguarding existing community premises), S2 (new or improved community premises) and S3 (schools) will likely result in significant positive effects on the attainment of SA Objective 3 as these seek to protect existing community facilities and ensure new community premises are accessible to the community.

Transport policies T1 – T7 & T9

5C3.28 Generally, it is considered that the transport policies will result in significant positive effects on providing an environment that is accessible to and fully inclusive for all people, improve accessibility to key services and facilities, and reduce the need to travel. New public transport infrastructure to address low levels of accessibility in some areas of the Borough, and improvements to existing infrastructure to be more accessible for use by disabled people and young families will likely be long term achievements, and rely on securing significant levels of funding. Accordingly deliverability for some projects (in particular those not listed in the Infrastructure Schedule, and those listed but with unknown funding) will likely be a barrier to some extent, at least in the short to medium term, in best achieving SA Objective 3 and it is uncertain whether such infrastructure will keep pace with expected growth.

Environment and green infrastructure policies EN1 and EN2

5C3.29 It is considered that policies EN1 and EN2 should result in positive effects on SA Objective 3 as they seek to improve access to open space and healthy food. Policy EN2 has been improved in response to previous SA recommendation to enable food growing spaces on appropriate land or buildings (such as community, religious, commercial or school), rather than limited to residential uses. This will increase accessibility to fresh and healthy food in terms of SA Objective 3 and therefore results in more positive effects.

Quality of the Built Environment policies Q1, Q7, Q17, Q25

- 5C3.30 Policy Q1 is an important policy in terms of SA Objective 3. Previous SA recommendation to ensure any updated guidance informs design approach and proposals; has been accepted by the Council and strengthens the policy even more in terms of accessibility and SA Objective 3.
- 5C3.31 In response to previous SA recommendation policy 6 on the urban design of public realm has been strengthened in terms of SA Objective 3 as urban design of public realm is expected to improve for all users legibility, permeability and convenient access via direct routes. This amendment to policy should result in significant positive effects for accessibility and inclusiveness.
- 5C3.32 Sometimes shop fronts and entrances can be a barrier to disabled people, the elderly and people with pushchairs particularly those within historic buildings. It is considered that policy Q16, shop fronts, somewhat provides for these groups by clauses (iv) 'adequate entrance doors' and clause (vi) 'have level entrances where possible'. However, coupled with other Local Plan policies, in particular policy Q1, significant positive effects for accessibility and inclusiveness should result.

Places and neighbourhoods policies PN1 – PN11

- 5C3.33 In combination with other Local Plan policies, it is generally considered that the Places and Neighbourhoods policies (PN1 – PN11) should result in significant positive effects in relation to SA Objective 3. This is particularly so because most of the major places and neighbourhoods seek mixed used development (e.g. Vauxhall, Waterloo, Brixton) and all policies seek public realm improvements such as linkages, permeability and connectivity as well as public transport accessibility and capacity improvements.

ASSESSMENT OF SITES

Likely significant effects of implementing Site Allocations, taking into account mitigation

- 5C3.34 All sites in Table 18 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 3.

Table 17: Significance criteria for SA Objective 3: Access and Services

| Positive | Negative |
|---|---|
| <ul style="list-style-type: none"> • Provides new community services and facilities in areas of need or improves existing access to such services and facilities. • Promotes mixed use development. • Site specific allocations: good accessibility judged as being located within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes of key services (schools, GPs, hospitals, food shops, banking facilities and post office). • Supports existing town and local centres. | <ul style="list-style-type: none"> • Worsens existing access to range of community services and facilities. • Poor provision of services and facilities in new development. • Site specific allocations: located more than 20 minutes of door-to-door journey time by public transport, walk, or cycle modes of key services (schools, GPs, hospitals, food shops, banking facilities and post office).. • Undermines existing town or local centres. |

TABLE 18: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 3: ACCESS AND SERVICES

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|---|--|----------------------|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | <ul style="list-style-type: none"> - Preferred use of site is for expansion of St Thomas's Hospital and replacement of existing affordable housing; therefore improves existing community service and facilities - Public transport accessibility level is exceptional - supports existing town centre | | |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | <ul style="list-style-type: none"> - preferred use is to improve existing facilities by expanding Sudbourne Primary School and therefore result in more local children being able to attend their local primary school (reduced need to travel) | <ul style="list-style-type: none"> - single use development however this addresses a priority need in the Borough by increasing number of school placements | |
| 3 | Vale Street Depot, Vale Street SE27 | <ul style="list-style-type: none"> -preferred use is for education use or housing and retention of the reuse and recycling centre. Therefore it addresses identified priority need that benefits community services and facilities by allowing local children to attend their local school (reduced need to travel) and also provides local waste facilities in terms of recycling and reuse centre - good accessibility for local children and residents | | |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> - Preferred use is education, associated nursery and potential for enabling residential (provides new community services and facilities and therefore improved accessibility for local residents) - | | |
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> - mixed use development - good accessibility to healthcare, public transport, shops - public transport accessibility level is exceptional - supports existing town centre (Waterloo) - seeks to improve accessibility to Waterloo Station | | |
| 6 | Shell Centre, 2-8 York Road SE1 | <ul style="list-style-type: none"> - preferred use is mixed use employment led development including office, residential (including affordable housing), retails, cultural, sport, leisure, community facilities and replacement police facility - supports existing town centre - public transport accessibility level is exceptional - seeks to improve accessibility to Waterloo Station | | |
| 7 | Waterloo Station, Waterloo Road SE1 | <ul style="list-style-type: none"> - site has good accessibility to key services and facilities; improvements to the site also enable improved access to key services and facilities - seeks to improve accessibility to and around Waterloo Station - transport use and office and retail - supports existing town centre | | |
| 8 | Cornwall Road Bus Garage, Cornwall Road | <ul style="list-style-type: none"> - preferred use of the site is mix of activities including residential and commercial as well as replacement bus garage | | |

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| | SE1 | <ul style="list-style-type: none"> - supports existing town centre - site has good accessibility to key services and facilities; improvements to the site also enable improved access to key services and facilities - provides replacement community service (bus garage) - Public transport accessibility level is exceptional | | |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | <ul style="list-style-type: none"> - Preferred use for site is mixed uses including B1 office, residential (including affordable), active frontages - site has good accessibility to key services and facilities; improvements to the site also enable improved access to key services and facilities - supports existing town centre | | |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | <ul style="list-style-type: none"> - preferred use of site is mix of uses including residential, employment and operational fire station - supports existing town centre - public transport accessibility level is exceptional - good accessibility to healthcare, public transport, shops - supports existing local centre - improved active travel accessibility | | |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | <ul style="list-style-type: none"> - preferred use is mixed use development, employment, residential and potential location for a new primary school - public transport accessibility level is exceptional - good accessibility to healthcare, public transport, shops, education (reduced need to travel) - supports existing town centre | | |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | <ul style="list-style-type: none"> - preferred use of site is town centre led mixed use development with employment, community uses and residential, and re-provision of a hostel - good accessibility to healthcare, public transport, shops - public transport accessibility level is exceptional | | |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | <ul style="list-style-type: none"> -preferred use is town centre led mixed use development of retail, residential and bus station improvements - public transport accessibility level is exceptional - public realm improvements to accessibility - good accessibility to healthcare, public transport, shops | | |
| 14 | Somerleyton Road SW9 | <ul style="list-style-type: none"> - preferred use of site is mixed use development of residential, employment, community facilities, social enterprise and open space - supports existing town centre - good accessibility to healthcare, public transport, shops, community services and facilities and culture | | |
| 15 | Popes Road SW9 | <ul style="list-style-type: none"> - preferred use of site is mixed use development with retail, commercial, community, leisure, residential | | |

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|----|--|--|--|--|
| | | <ul style="list-style-type: none"> and town centre car and cycle parking - site provides opportunity for a replacement leisure centre - site re-provides adequate market facilities - public transport accessibility level is exceptional - good accessibility to community facilities, services, local shops - supports existing town centre | | |
| 16 | Brixton Central (between the viaducts) SW9 | <ul style="list-style-type: none"> - preferred use of site is improvements to Brixton Station entrance and pedestrian links, creative and cultural industries, market support centre, mixed use retail, food and drink, community leisure and recreation uses, with potential for student housing - good accessibility to community facilities, services, local shops, food, employment - public transport accessibility level is exceptional - supports existing town centre - improved access and permeability proposed | | |
| 17 | 'Your New Town Hall' SW2 | <ul style="list-style-type: none"> - preferred use of site is civic uses with outdoor space, community facilities, retail, residential, employment - public transport accessibility level is exceptional - good accessibility to services, facilities, local shops, healthcare, employment - supports existing town centre | | |
| 18 | 286 - 362 Norwood Road SE27 | <ul style="list-style-type: none"> - preferred use is retail led mixed use development including supermarket, housing, community uses, new public square - supports existing town centre - good accessibility to services, facilities, local shops, healthcare, employment - public transport accessibility level is very good - public realm improvements to include widening of pavements new public square and improved bus facilities | | |

Summary of Local Plan policies and site allocations

5C3.35 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will have significant positive effects albeit with some element of uncertainty on the existing baseline and ensuring that everyone has access to community services and facilities.

Table 19: Summary assessment of effects of Local Plan on Access and Services

| Assessment of effects of Local Plan on SA objective 3 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|--|-------|---|---|------------------------|
| Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities | ++/? | <p>Generally, it is considered that the Local Plan contains good provisions for ensuring an accessible environment (i.e. urban design of public realm and buildings, housing and transport). To address existing baseline issues of poorer accessibility to community services for some residents in the Borough; it is critical that new social infrastructure is delivered in locations to address identified need.</p> <p>Most of the site allocations have good accessibility and support existing town and local centres. Many of the sites promote mixed use developments, thereby further enhancing accessibility and seek to provide new community services and facilities in areas of need (for example schools on sites 2 and 3).</p> <p>However, there is a level of uncertainty regarding delivery of some transport infrastructure and additional school places, particularly in a timely manner before developments are occupied.</p> | <p>Improved accessibility of the built environment and to new open spaces is not likely to be seen until developments are completed, and this is not likely to occur until the mid to long-term.</p> <p>Large scale transport infrastructure considered necessary to keep pace with projected growth such as a replacement for the former Cross River Tram, extension of the Croydon Tramlink, northern line extension to Nine Elms and new station stop on the London Overground at Brixton is unlikely to be seen until the long term, towards the end of the plan period due to nature of works and/or lack of identified and committed funding.</p> | Permanent |

Recommendations for monitoring likely significant effects

5C3.36 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § Index of Multiple Deprivation
- § Average distance of households and bus stations to health/medical centres
- § Proximity of new housing developments to services, facilities and employment
- § Improvement in unrestricted open space per 1000 population
- § Number of private vehicles owned by residents in the Borough
- § Gross additional wheelchair accessible homes
- § Updated Infrastructure Schedule
- § walking mode share based on all trips originating within Lambeth - target 32% by 2026
- § cycling mode share based on all trips originating within Lambeth - target 8% by 2026

5C4 INFRASTRUCTURE

5C4.1 This section of the SA relates to the sustainability performance of the Local Plan against:

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

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

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

Relevant policy objectives

National Level

5C4.3 The *National Planning Policy Framework 2012* contains many policies and references to infrastructure. Strategic policies should address provision of infrastructure delivery for transport, telecommunications, waste management, water supply, wastewater, flood risk and energy (including heat); and the provision of health, security, community and cultural infrastructure and other local facilities, including green infrastructure and schools.

Regional Level

5C4.4 The *London Plan 2011* contains a wide range of policies pertaining to various forms of infrastructure to support development. This includes infrastructure relating to green spaces, energy, social, business (including information and communications), water, sewerage and waste, and transport (including freight handling and waterway infrastructure). The Plan also provides policies on the Community Infrastructure Levy which helps fund necessary infrastructure.

Baseline conditions and existing issues

Physical Infrastructure

5C4.5 Existing public transport in Lambeth is already very well used and over capacity in some cases, and current improvements will not achieve the level of capacity increase that is needed. Some projects are underway to improve transport capacity, for example Waterloo station and platform upgrades, improvements to London Underground Victoria and Northern Lines to increase capacity. Extension of the London Overground to Clapham Junction has recently been completed and new stations at Brixton and/or Loughborough Junction are desirable.

5C4.6 Thames Water has two strategic sites in Lambeth: Daysbrook Road in Streatham, and Waterworks Road in Brixton. A recent project that has increased water supply capacity is the Thames Water Ring Main Extension which was a new build tunnel extension which linked the Honor Oak reservoir site in the London Borough of Southwark, to the Brixton pumping station in the London Borough of Lambeth.

- 5C4.7 The Distribution Network Operators (DNO) distributes electricity to homes and businesses. The DNO for electricity in Lambeth is EDF Energy. EDF Energy owns the EDF Energy Substation and Depot Site at 54 Bengeworth Road, SE5. EDF Energy states that this serves a significant catchment of London, providing electricity and supporting facilities to residents, businesses and London's central business district; that this is a key facility that forms part of the London electricity supply network and will remain so for the foreseeable future (at least 50 years); and that as such it is a facility of national security importance. EDF Energy advises that the structures on part of the site are outdated and surplus to operational requirements. EDF Energy is therefore investigating the scope for partial redevelopment of the depot site.
- 5C4.8 National Grid has one high voltage electricity underground cable which runs through Lambeth: the 275kV underground cable running from Wimbledon substation in Merton to Hurst sub-station in Bexley. National Grid has not advised of any future development plans affecting its electricity transmission infrastructure in Lambeth during the period of the Local Plan. National Grid has no gas transmission assets located within Lambeth.
- 5C4.9 Southern Gas Networks owns and operates the local gas distribution network in Lambeth. Southern Gas Networks have four gas holders at Kennington which are in their medium to long term storage strategy. There are currently no plans to decommission these gas holders. Gas connections are put in place when required but no large infill projects are currently planned in Lambeth.
- 5C4.10 Major Combined Heat and Power (CHP) and community heating schemes are in development at the Roupell and Ethelred housing estates, and through the Myatts Fields North housing estate regeneration (a Private Finance Initiative scheme). The Clapham Park Estate regeneration will involve two large scale energy centres with CHP, providing heat and hot water to over two thousand homes. South Bank Employers' Group is promoting CHP and community heating networks amongst commercial developers in South Bank area to build large scale energy networks. The King's College Hospital and Guy's and St Thomas' Hospital masterplans also set out future strategies for CHP.
- 5C4.11 *Social Infrastructure*
There are two major hospitals in the Borough each with A&E facilities. Lambeth and Southwark Public Health Directorate currently operates from 23 sites, of which 11 are owned and 12 leased. The preferred future model in Lambeth is for a Primary Care Neighbourhood Network comprising Neighbourhood Resource Centres ('hubs') and existing GP and dental practices ('spokes'). In addition to Lambeth and Southwark Public Health Directorate premises, primary care services are also provided by:
- 54 GP Practices
 - 59 Pharmacies
 - 40 Dental Practices
 - 20 Ophthalmic Practices
- 5C4.12 There are currently three ambulance stations in Lambeth: Waterloo (same location as current HQ/control centre); Brixton (Milkwood Road) and Streatham. Brixton and Streatham have recently been refitted and are fit for purpose; there are no plans to extend or relocate these.

- 5C4.13 There are currently four land fire stations in Lambeth:
- Brixton – 84 Gresham Road
 - Clapham – 29 Old Town
 - North Lambeth – 8 Albert Embankment
 - West Norwood - 455 Norwood Road
- 5C4.14 There is one river fire station in Lambeth opposite 8 Albert Embankment. Brixton, Clapham and West Norwood are all old facilities no longer fit for purpose. Redevelopment and/or relocation options are being explored. If relocation is required, this would need to be close to the existing site.
- 5C4.15 The number of school places in the borough is currently insufficient to meet future demand, both at secondary and primary level. It is estimated that approximately half of the 11-15 aged secondary pupils currently resident in Lambeth attend schools in neighbouring local authorities, or in the independent sector. There is also a need to meet the growing needs from population increase. It is the Council's aspiration to provide a year 7 place for 80% of pupils leaving primary school. There is a current shortage of primary school places to meet existing demand, and further places will be required to meet projected future population growth. The estimated current and future demand has identified particular shortages in Brixton, Norwood and Streatham.
- 5C4.16 Lambeth is one of fourteen local authorities which, because of its level of deprivation, will be expected to rebuild 20% of its primary schools, instead of the national target of 5%. This means that 30% of Lambeth primary schools will be refurbished.
- 5C4.17 Current provision includes 13 Secondary Schools, 61 Primary Schools, five Special Schools, five Nurseries and two Pupil Referral Units (*DfE Schools Census, 2012*). There are also 27 Children's Centres in the Borough.
- 5C4.18 Lambeth has a number of further and higher education establishments including King's College and Lambeth College (largest provider of adult and community learning in the Borough). King's College aims to be one of the top six universities in the UK, and one of the top twenty-five internationally. It plans to grow by 3,000 students over the next five to ten years. Its estate comprises five main campuses, of which four are wholly or partly in Lambeth. These are at Waterloo, St Thomas's, Guy's and Denmark Hill (which straddles the border with Southwark and is closely associated with King's College Hospital).
- 5C4.19 The Waterloo campus is particularly critical and includes four buildings. King's College wishes to expand to another site in the area and would like to see its Waterloo campus develop as an educational and cultural quarter linked to the South Bank. The shortage of good quality, affordable and local student housing has become an issue recently. An additional 1,000 beds are required to meet projected demand at King's. In addition to buying in accommodation from student housing providers, King's is looking at its own assets to provide accommodation, particularly for overseas and post-graduate students (*King's College London Strategic Plan 2006 – 2016*).

- 5C4.20 The Borough has four leisure centres – Flaxman, Briston, Ferndale, and Clapham – and one Lido facility at Brockwell. In addition there is a wide variety of sporting facilities which include:
- natural turf pitches
 - all weather astro pitches - 3rd generation and sand filled astro
 - redgra pitches
 - hard courts
 - MUGA surfaces.
- 5C4.21 Lambeth has nine libraries spread across the borough. All Lambeth's libraries are free to join and have access for people with disabilities. Brixton, West Norwood and the mobile libraries have induction loops. Brixton Library has a minicom facility.
- 5C4.22 West Norwood Cemetery is the only council owned burial space within the borough. Lambeth Council also owns and manages Streatham and Lambeth Cemeteries, both of which are located in the London Borough of Wandsworth. There is currently insufficient capacity in Lambeth cemeteries to deal with future demand for burials from Lambeth residents. Lambeth has two crematoria located in West Norwood and Lambeth Cemeteries
- 5C4.23 There are some cultural differences between communities around preferences for burial. Catholic communities have historically tended to have a preference for burial rather than cremation, but this is changing and cremation is becoming more common. Catholics do not necessarily require dedicated Catholic burial areas. Hindus and Sikhs prefer cremation. There is a specific issue in relation to Lambeth's Muslim communities which require burial with no casket (the body is wrapped in a shroud and placed straight into the ground) and prefer proximity to other Muslim graves. This means that concrete burial chambers and intermediate graves (empty graves located between occupied graves) tend not to be acceptable. Muslim communities would prefer a dedicated Muslim burial area within Lambeth cemetery. This compounds the problem of insufficient burial space capacity in Lambeth's cemeteries.
- 5C4.24 Lambeth has some 270 hectares of open space, which amounts to almost 10% of its total area. However, the borough is intensively built up and there are limited opportunities to secure increases in large areas of additional open space. Lambeth has many highly valued areas of open space but in some parts of the Borough, particularly the north, this is in short supply relative to the level of resident population. With planned population increase, pressures on open space will become even more intense across the Borough.
- 5C4.25 The Council has successfully secured 11 prestigious Green Flag Awards which is the national standard for quality parks and open spaces. Archbishop's Park, Brockwell Park, Kennington Park, Milkwood Community Park, Myatt's Fields Park, Ruskin Park, The Rookery Streatham, St. Paul's Churchyard, Vauxhall Park, St John's Churchyard and Hillside Gardens Park all have Green Flag Awards.
- 5C4.26 Green infrastructure provision can be increased through green roofs. Lambeth Housing has incorporated green roofs in refurbishments including Ethelred Estate, redevelopments in Stockwell and Clapham.

Likely future evolution without the plan

- 5C4.27 While there are a number of national and regional programmes and projects specific for Lambeth Borough infrastructure; it is considered that in the absence of a Local Plan delivery of some infrastructure may be less co-ordinated in terms of addressing identified need in the local environment in a timely manner. The Core Strategy 2011 would remain the local development plan document for the Borough but without a new Local Plan, there runs a risk that the Core Strategy is not considered up-to-date and therefore not consistent with the NPPF.
- 5C4.28 The delivery of essential infrastructure needed to support population growth is critical. The delivery of infrastructure needs to keep pace with development and population growth; otherwise there could be a shortfall in provision of infrastructure such as sewage, water supply, social facilities such as schools and doctors surgeries and green infrastructure such as parks and nature areas. There is an expected demand for an additional 5460 primary school places and an additional 3108 secondary school places over the plan period. The amount of open space per person is expected to decrease with population growth and expected new development (and a lack of opportunity for the creation of major open space). Absence of the Local Plan increases risk that necessary and appropriate infrastructure is not delivered.

Assessment of Policies

- 5C4.29 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 4, Infrastructure. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.
- 5C4.30 The following policies have been screened as having potential for significant effects on this objective.

| | |
|---|---|
| D1 – Delivery and monitoring | EN1 – Open Space |
| D2 – Presumption in favour of sustainable development | EN5 – Flood risk |
| D3 – Infrastructure | EN6 – Sustainable drainage systems and water management |
| D4 – Planning obligations | EN7 – Sustainable waste management |
| H10 – Gypsy and Traveller needs | Q6 – Urban design / public realm |
| ED1 –Key Industrial and Business Areas (KIBAs) | Q9 - Landscaping |
| ED2 – Business uses outside KIBAs | Q21 – Registered parks and gardens |
| S11 – Safeguarding existing community facilities | Q23 – Undesignated heritage assets |
| S12 – New or improved community facilities | PN1 – Waterloo |
| S13 - Schools | PN2 – Vauxhall |
| T1 – Sustainable travel | PN3 – Brixton |
| T2 – Walking | PN4 – Streatham |
| T3 – Cycling | PN5 – Clapham |
| T4 – Public transport infrastructure | PN6 – Stockwell |
| T5 – River transport | PN7 – West Norwood |
| T6 – Assessing impacts of development on transport capacity | PN8 – Kennington / Oval |
| | PN9 - Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and monitoring policies D1 – D4 Proof read to here

5C4.31 Policies D1 – D4 should result in significant positive effects, particularly policies D3 – Infrastructure, and D4 Planning obligations. Policy D3 seeks to safeguard and improve essential social, physical and green infrastructure to support growth, and work with partners to deliver additional infrastructure. An Infrastructure Programmes and Schedule is provided and this gives detail on a number of projects relating to transport, schools, parks and open spaces, Thames Tunnel, and waste infrastructure requirements. Accordingly, this schedule sets out infrastructure that is planned (or has already been delivered in 2012) to meet current and likely future demands. However, for some projects funding gaps have been identified which may threaten the deliverability of projects, for example transport, schools, health and open space improvement projects. Some projects require contingency planning. Policy D4 provides guidance on when section 106 planning obligations will be sought and this will help deliver infrastructure projects.

Housing policy H10

5C4.32 This policy seeks to safeguard the existing gypsy and traveller site in Streatham Vale. It also seeks to identify a new site or sites for additional facilities over the lifetime of the plan. Identification and indeed delivery of an appropriate site in the Borough is considered a current matter of uncertainty.

Economic development policies ED1 and ED2

5C4.33 Policy ED1 safeguards business and industrial sites in the Borough. Known as Key Industrial Business Areas (KIBAs), only development related to business, industrial, storage, waste management, and green industries and ancillary uses will be permitted. Policy ED2 also seeks to protect sites and premises in business use. However, loss of land or floorspace in business, industrial, storage or in employment generating *sui generis* use into local community or cultural use (D1 class) will be considered where the proposal secures major planning priorities for which there is a demonstrable need which cannot be achieved in any other way. This therefore provides for social infrastructure generally (excludes leisure, sport and recreation), but not green infrastructure. Overall, the policy contributes positive effects for SA Objective 4 although deliverability is considered uncertain.

Social infrastructure policies S1 – S3

5C4.34 Overall it is considered that policies S1 – S3 provide a good foundation for social infrastructure in the Borough in relation to SA Objective 4. However, deliverability is a key issue. Annex 2 identifies considerable funding gaps for transport projects (for example Tramlink extension, and replacement Cross River Tram project), accommodating additional school placements and healthcare, for example adequate healthcare provision necessary for the expected growth at Vauxhall is also uncertain. Infrastructure necessary to support expected population growth from growth in Opportunity Areas and achievement of housing targets is essential in achieving sustainable development. Deliverability is a key concern.

Transport policies T1 – T6

5C4.35 Transport policies seek to provide and improve physical infrastructure to enable sustainable travel, including active travel through walking and cycling routes and river transport and will likely result in significant positive effects on physical transport infrastructure. Policy T1(c) seeks to ensure infrastructure keeps pace with population growth and demand by stating that development will be required to be appropriate to the level of public transport accessibility and capacity in the area, or to contribute towards increasing public transport accessibility and capacity where this cannot be achieved through TfL or other funding as appropriate. Further, Annex 2 provides detail as to future transport infrastructure improvements and projects, as well as funding information. However, as previously mentioned, deliverability remains uncertain for some infrastructure projects in terms of funding. Policy T4 outlines public transport infrastructure required for better connectivity, quality and capacity of transport and travel. The premise of the policy is commendable; it is the deliverability of such transport schemes in a timely manner that is of key concern given the level of growth the Local Plan supports.

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

5C4.36 Policy EN1 seeks to protect existing open space, biodiversity, improve access to open space, and increase the quantity of open space including in areas of open space deficiency. The policy also seeks to create or extend green chains and links thereby further contributing to the green infrastructure network in the Borough. Similarly policy EN2 also contributes to the green network in the Borough.

5C4.37 The delivery of district heat networks is considered uncertain, particularly in terms of identifying sites for Energy Centres, but also in terms of access to land for pipework.

5C4.38 Policy EN5 addresses flood risk and contains policy to mitigate flooding from sewers which should be discussed with Thames Water Utilities Ltd; and policy on flood defences. Clause (g) states that on sites adjacent to the River Thames and River Graveney, maintenance, remediation and improvements to the flood defence walls will be required *where these are in poor condition* (emphasis added). It is considered that flood defences should not be permitted to get to a state of poor condition in the first place as significant adverse effects could result. It is considered that such a situation should never arise whereby the defences are deemed to be in 'poor condition'. Regular maintenance and improvements would increase the likelihood that flood defences continue to be fit for purpose and their specific design standard maintained. This was raised in the previous SA but the Council response to this was that the existing policy wording is considered acceptable, and maintenance, remediation and improvements would only be required where necessary. It is considered that the point regarding 'poor condition' flood defences remains valid and rather flood defences should be safeguarded and maintained to avoid or mitigate the process of defences deteriorating into poor condition.

SA recommendation: Use of the words 'in poor condition' with regards to flood defence walls is not considered acceptable with regards to minimising flood risk. Flood defence walls should at all times be fit for purpose and at their highest standards – not in poor condition.

Council Response: Agreed – 'in poor condition' has been replaced with 'where necessary'.

- 5C4.39 Policy EN6 provides for sustainable drainage systems and water management. Overall it is considered that the policy should result in positive effects for water and sewerage infrastructure. The Thames Tunnel is a major infrastructure improvement, increasing capacity and reducing overflows of untreated sewage into the Thames. In response to previous SA recommendation the policy has been strengthened so that sustainable water management through Water Sensitive Urban Design is implemented in proposals (rather than considered). Similarly water efficiency measures are to be incorporated where practical. Cumulative impact of developments on the local public sewerage network is now better addressed as a result of previous SA recommendation in terms of ensuring adequate capacity. However the policy does not seek to ensure adequate water supply is in place prior to occupied developments. It is recommended that policy EN6(vii) is amended to read 'demonstrate that both the local water supply and local public sewerage network has adequate capacity both on and off site to serve the development...'. This will help avoid water shortages with associated low pressure water supply problems and ensure infrastructure is sufficient for projected growth.

SA recommendation: Policy EN6(vii) should refer to both local water supply and local public sewerage network. This would help avoid, remedy or mitigate potential significant adverse effects associated with water supply and SA Objective 12.

Council Response: Agreed, this change has been made to policy EN6 (vii).

- 5C4.40 It is considered that Policy EN7 on sustainable waste management makes good provision for safeguarding existing waste management sites and new sites in KIBAs and other appropriate locations, given the limited land supply in the Borough.

Quality of the Built Environment policies Q7, Q10, Q22, Q24

- 5C4.41 Overall it is considered that the built environment policies appropriately provide for the public realm infrastructure including green infrastructure through protecting landscaping features such as planting, habitats and registered parks and gardens.

Places and neighbourhoods policies PN1 – PN10

- 5C4.42 Overall, it is considered that the places and neighbourhoods policies make provision for infrastructure relative to scale of development proposed, in particular those places earmarked for significant growth, Waterloo, Vauxhall and Brixton. All policies seek to improve public realm and linkages for pedestrians and cyclists. Most policies also provide for transport accessibility and capacity improvements. Policies for Waterloo, Vauxhall, Streatham and West Norwood seek to provide new open space provision. Most of the policies also make provision for community services and facilities (the smaller centres like Clapham, Stockwell and West Norwood achieve this particularly well to ensure the continued vitality of these district centres). Provision of additional school places is included in the Brixton policy, and Waterloo will accommodate higher education uses. The Vauxhall policy seeks to support expected growth and mitigate impacts of development by requiring new development to pay for necessary infrastructure. Some specific infrastructure is highlighted in the policy, for example, health facilities, district heat networks and/or is supported by the Infrastructure Schedule. The level of growth proposed for Brixton would benefit from a new station at Brixton or Loughborough Junction providing accessibility to north east London via the London Overground. However, as already highlighted, delivery of various types of infrastructure is a key concern across the borough.

5C4.5 Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C4.43 All sites in Table 21 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 4.

Table 20: Significance criteria for SA Objective 4: Infrastructure

| Positive | Negative |
|--|--|
| <p>For all allocations:</p> <ul style="list-style-type: none"> • sufficient water supply and sewerage capacity exists (or is planned) to accommodate the development and its future needs; • sufficient health 'infrastructure' (facilities and services) exists (or is planned) to accommodate the development and its future needs; • sufficient transport infrastructure exists (or is planned) to accommodate the development and its future needs; <p>For residential site specific allocations:</p> <ul style="list-style-type: none"> • sufficient school place provision exists, or increased capacity is planned, in the local area (school places to match school role projections); • site located within 400 metres of green space accessible by existing footpaths or cycleways. Site provides additional access to green space; | <p>The infrastructure needs referred to in the '+ve' box are not in place or unlikely to be provided in the near future.</p> |

TABLE 21: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 4: INFRASTRUCTURE

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|--|---|--|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | <ul style="list-style-type: none"> - improves existing health infrastructure - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Jubilee Gardens and Archbishops Park) | <ul style="list-style-type: none"> - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. - Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Delivery of some planned transport infrastructure improvements are uncertain | <ul style="list-style-type: none"> - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN1 - Thames Tunnel |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road | <ul style="list-style-type: none"> - improves social infrastructure i.e. school places - sufficient transport and health infrastructure exists | | |
| 3 | Vale Street Depot, Vale Street SE27 | <ul style="list-style-type: none"> - if site is used for education: improves social infrastructure i.e. school places - safeguards existing waste infrastructure (reuse and recycling centre) but loses depot for waste collection vehicles | <ul style="list-style-type: none"> - if site is used as housing and not education: insufficient school place provision currently exists as the area has been identified as an area in need of additional school places - site promotes private car use – public transport infrastructure is poor - play space/MUGA area may be lost although it is currently in a poor location for this use | <ul style="list-style-type: none"> - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN1 - Thames Tunnel |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> - preferred use of site is Education and potential residential – thereby improving school place provision - Sufficient transport infrastructure | | |
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Jubilee Gardens and Archbishops Park) -sufficient health infrastructure currently exists and further improvements are planned (including CHP connections) | <ul style="list-style-type: none"> - Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. - Delivery of some planned transport infrastructure improvements are uncertain | <ul style="list-style-type: none"> - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN1 - Thames Tunnel |
| 6 | Shell Centre, 2-8 York Road SE1 | <ul style="list-style-type: none"> - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Jubilee Gardens and Archbishops Park) -sufficient health infrastructure currently exists and further improvements are planned (including CHP connections) | <ul style="list-style-type: none"> - Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. | <ul style="list-style-type: none"> - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN1 - Thames Tunnel |

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| | | - replacement community facilities included as preferred use (police facility) | - Delivery of some planned transport infrastructure improvements are uncertain | |
| 7 | Waterloo Station, Waterloo Road SE1 | - improves existing transport infrastructure to increase capacity and accessibility -sufficient health infrastructure currently exists and further improvements are planned (including CHP connections) | - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. - Delivery of some planned transport infrastructure improvements are uncertain | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN1 - Thames Tunnel |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs as well as replacement bus garage provision either on site or an alternative site - site is located within 400m of green space (Jubilee Gardens and Archbishops Park) -sufficient health infrastructure currently exists and further improvements are planned (including CHP connections) | - Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. - Delivery of some planned transport infrastructure improvements are uncertain including redevelopment of the bus garage | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN1 - Thames Tunnel |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Spring Gardens and Archbishops Park) -sufficient health infrastructure currently exists and further improvements are planned (including CHP connections) | - Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. - Delivery of some planned transport infrastructure improvements are uncertain | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN2 - Thames Tunnel |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Spring Gardens and Archbishops Park) -sufficient health infrastructure currently exists and further improvements are planned (including CHP connections) - replacement community facilities included as preferred use (fire service) | - Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. - Delivery of some planned transport infrastructure improvements are uncertain, particularly before occupation of developments | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN2 - Thames Tunnel |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Spring Gardens and Vauxhall Park) | - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. - Delivery of some planned transport | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, |

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| | Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | -sufficient health infrastructure currently exists and further improvements are planned (including CHP connections) - identified potential location for a new primary school as well as mixed use development: meet school places demand - retains public house (social infrastructure) | infrastructure improvements are uncertain, particularly before occupation of developments | EN6, EN7 and PN2 - Thames Tunnel |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Spring Gardens and Vauxhall Park) -sufficient health infrastructure currently exists and further improvements are planned (including CHP connections) - new primary school proposed on adjacent site (Keybridge House) | - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. - Delivery of some planned transport infrastructure improvements are uncertain, particularly before occupation of developments | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN2 - Thames Tunnel |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs; and retention of existing bus station - site is located within 400m of green space (Spring Gardens and Vauxhall Park) -sufficient health infrastructure currently exists and further improvements are planned (including CHP connections) - new primary school proposed on adjacent site (Keybridge House) | - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. - Delivery of some planned transport infrastructure improvements are uncertain, particularly before occupation of developments | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN2 - Thames Tunnel |
| 14 | Somerleyton Road SW9 | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Hilmead Nature Garden and Loughborough Park) -sufficient health infrastructure currently exists and further improvements are planned | - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. - Delivery of some planned transport infrastructure improvements are uncertain | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN3 - Thames Tunnel |
| 15 | Popes Road SW9 | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Max Roach Park) -sufficient health infrastructure currently exists and further improvements are planned | - Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Delivery of some planned transport infrastructure improvements are uncertain - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN3 - Thames Tunnel |
| 16 | Brixton Central (between the viaducts) SW9 | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs -sufficient health infrastructure currently exists and further | - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. | - Compliance with other Local Plan policies in particular policies D3, |

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| | | improvements are planned | - Delivery of some planned transport infrastructure improvements are uncertain | D4, S1 – S2, T1 – T6, EN6, EN7 and PN3 - Thames Tunnel |
| 17 | 'Your New Town Hall' SW2 | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (Rush Common) -sufficient health infrastructure currently exists and further improvements are planned | - Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Delivery of some planned transport infrastructure improvements are uncertain - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN3 - Thames Tunnel |
| 18 | 286 - 362 Norwood Road SE27 | - sufficient transport infrastructure exists and increased capacity is planned to accommodate the development and its future needs - site is located within 400m of green space (West Norwood Cemetery) -sufficient health infrastructure currently exists and further improvements are planned | - Allocation may lead to additional unmet skills or education needs, due to lack of capacity at existing schools - Water supply and sewerage capacity may be under increased pressure from extra demand although Thames Tunnel is planned. | - Compliance with other Local Plan policies in particular policies D3, D4, S1 – S3, T1 – T6, EN6, EN7 and PN8 - Thames Tunnel |

5C4.44 **Summary of Local Plan policies and site allocations**
Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will result in a mix of positive, and uncertain effects with regards to adequate infrastructure being in place in a timely manner to accommodate expected growth.

Table 22: Summary assessment of effects of Local Plan on Infrastructure

| Assessment of effects of Local Plan on SA objective 4 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|---|-------|---|--|--|
| To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands | ? | The Local Plan makes clear that housing growth, economic development and environmental sustainability cannot be achieved without a wide array of essential infrastructure. The Local Plan policies provide good context and provision for the different kinds of infrastructure required to meet current and future demands. Accordingly much required infrastructure is planned. Some infrastructure improvements such as upgrades of Northern and Victorian underground lines have recently been completed. However, there remain uncertainties about the <u>delivery</u> of essential infrastructure required for growth. These relate to timing – there is a real risk that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front before occupation of development (this will likely impact Vauxhall given the extent of planning permissions already granted and likely to be completed before the extension of the Northern Line to Nine Elms); funding required – for some of the proposed infrastructure funding has not yet been secured (e.g. school place provisions, new rail station at Brixton and/or Loughborough Junction, heat networks) and; proportion of open space per resident is likely to reduce as the population increases whilst new open space opportunities are extremely limited thus potentially worsening open space deficiency area rates. Insufficiencies in burial space are likely to continue. | Recently completed upgrade and improvement works of some underground lines and stations are providing some alleviation to capacity issues at some stations. Infrastructure required to meet demands of occupied new development will likely not be provided until at least the medium to long term, and in some cases may be delivered after occupation of major developments, in which negative impacts will likely be experienced in the interim. Delivery of several infrastructure projects considered necessary to support projected growth are unlikely until the long term, possibly at the earliest. | Permanent, however there will be temporary effects until necessary infrastructure is delivered (effects relating to construction and lack of infrastructure in the interim). |

Recommendations for monitoring likely uncertain effects

5C4.45 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § Annual update of infrastructure programmes schedule

5C5 EQUALITY AND DIVERSITY

5C5.1 This section of the SA relates to the sustainability performance of the Local Plan against:

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

5C5.2 To achieve this objective, plan policies should promote equity and fairness between population groups, improve environmental conditions for Lambeth's deprived areas and deprived communities, reduce poverty and social exclusion, promote social cohesion within and between population groups, and enable social integration between minority groups and wider society.

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

Relevant policy objectives

National Level

5C5.4 *National Planning Policy Framework 2012* states that planning policies and decisions should aim to achieve places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centre and active street frontages which bring together those who work, live and play in the vicinity.

5C5.5 A wide choice of high quality homes should be delivered that widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

Regional Level

5C5.6 The *London Plan 2011* contains a number of policies to tackle inequality and ensure equal life chances for all. Policies include appropriate social infrastructure for different groups, measures to improve health and addressing health inequalities. Boroughs should promote the effective management of places that are safe, accessible and encourage social cohesion, and planning, transport, housing, environmental, and health policies are integrated to promote the health and wellbeing of communities.

5C5.7 Policy 4.12 is on improving opportunities for all. In particular this policy seeks to improve employment opportunities for Londoners, to remove barriers to employment and progression and to tackle low participation in the labour market. The Plan acknowledges there are still large inequalities in access to jobs and levels of worklessness in the capital. Londoners from Black, Asian and minority ethnic (BAME) groups for instance are more than twice as likely to be unemployed as those from White groups.

5C5.8 Policy 7.2 on an inclusive environment require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design.

Baseline conditions and existing issues

5C5.9 Lambeth is an extremely ethnically diverse Borough. The proportion of white British

people has decreased from 50% to 39% in the last 10 years (Census 2011). It is among the most densely populated local authorities in England, with over 11,300 people per km². Lambeth's population is 303,100, which makes it the third largest population in inner London, after Newham (308,000) and Wandsworth (307,000) (Census 2011). The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. The borough is the 14th most deprived district in England, comparable with Southwark, Lewisham and Haringey, but less deprived than the most deprived London boroughs of Newham, Tower Hamlets and Hackney. The most deprived areas are spread throughout the borough but are particularly concentrated in Coldharbour ward, in Brixton, and in the Crown Lane area of Knights Hill ward, in the south of the Borough.

- 5C5.10 Lambeth ranks 5th for Black African people. The proportion of Lambeth residents with African passports is in the top 10% in the country. The Borough has the second highest proportion of black Caribbean people in the country and has the highest proportion of people identifying themselves as Other Black in the country (Census 2011). The Borough also has sizeable Portuguese, Polish and Vietnamese communities.

Potential issues affecting race / ethnicity

- § Accessing suitable affordable housing can be problematic.
- § Fear of crime, racial abuse and discrimination can prevent the enjoyment of the public realm and accessing open space.
- § Employment opportunities including affordable premises for small businesses and shops.
- § The London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (March 2008), identified a requirement for a maximum of 10 additional pitches for gypsies and travellers in Lambeth (evidence base requires updating).
- § Recently arrived communities can be more vulnerable to social isolation.

- 5C5.11 The gender split in Lambeth (49.8% male and 50.2% female) is similar to inner London and the country (both around 50-50).

Potential issues affecting gender

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

- 5C5.12 Overall not much is known about gender reassignment group in the Borough. People undergoing gender transition are more likely to be victims of hate crime and anti-social behaviour. Research conducted in the borough found that 29% of respondents avoided going to certain areas and 33% avoided going out at certain times of day/night (ESRO 2012). Lambeth is 6th highest in the country for registered same-sex civil partnerships (Census 2011).

Potential issues affecting gay, lesbian, bisexual and transgender groups

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

5C5.13 In August 2011, 12,690 Lambeth residents were in receipt of Disability Living Allowance, compared with 12,480 in May 2010. The PANSI system, produced by the Department of Health, that projects data from the Health Survey for England to a borough level suggests that there are 16,988 working age residents who have a moderate or severe physical disability in the borough, and 33,696 who have a common mental disorder. Of the 689 adults with learning disabilities receiving care and support in Lambeth, a very high proportion (334 people (higher than average for comparable local authorities)) are in residential care (Housing Strategy 2012).

Potential issues for people with disabilities

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

5C5.14 The age breakdown (sourced from State of the Borough Report 2011) for Lambeth is as follows:

- § Under 20 years: 22.6%
- § 20 – 44 years: 51.8%
- § 45 - 59 years: 14.6%
- § 60+ years: 10.9%

Potential Issues affecting Older People

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

Potential issues affecting children and young people

- § Those aged under 15 years make up almost one in five residents in the borough.
- § Child poverty and social exclusion is often caused by parents and guardians not having access to employment and training opportunities.
- § The provision of high quality social facilities, including childcare, play and informal recreation, youth services and meeting places, sport, leisure, culture and educational facilities. Space for young people is a particular priority in those parts of the borough where levels of youth unemployment, crime and gang activity are high.
- § A lack of access to free and inclusive play space and open space can hinder mental and physical development and independence. A recent audit highlighted geographical disparity in access to play across the borough, with a particular lack of facilities in the south of the borough, in West Norwood and Streatham. As the population of the borough increases, access to quality play provision will become an increasing priority across the borough as a whole.
- § Concerns relating to crime, safety and vulnerability particularly in relation to street crime and road accidents.
- § Reliable, safe and inexpensive (or free) public transport is required to enable young people to be independently mobile.
- § Obesity is a growing problem among children and young people in the borough.
- § For young people, concerns relating to anti-social behaviour focus on people using or dealing drugs.
- § Lambeth has a high number of young people Not in Employment, Education or Training (NEET)
- § There is current and future demand for additional school places in the borough at both primary and secondary level.
- § Lambeth currently has the highest teenage conception rate in the UK although this is decreasing.

- 5C5.15 In terms of religion, 53% of Lambeth residents identify themselves as Christian, 7% as Muslim and 28% say they do not have a religion (Census 2011). Muslim residents are likely to be younger, more ethnically diverse and less economically active than the population as a whole. They are more likely to have a main language that is not English. Muslim residents are more likely to prefer accessing council services in person, which may reflect lower confidence with written English and therefore on-line services (Customer survey 2012). Christian residents are more likely to be older, more settled residents, often in social housing, although there are also substantial smaller groups from, for example, Poland, Africa and Portugal who are younger and less settled. Services for older people could be targeted at Christians through churches and faith networks, including support and to encourage accessing services on-line (Customer survey 2012).

Potential issues affecting faith groups

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

- 5C5.16 Approximately 150 languages are spoken in the Borough. After English the main languages spoken are: Portuguese, Yoruba, French, Spanish and Twi (LBL 2012). Lambeth ranks 13th in the country for having no people in a household age over 16 with English as a main language and 20th for having no people of any age (Census 2011).

- 5C5.17 The Council owns and manages one gypsy and traveller site, located in Streatham Vale, which provides fifteen pitches. The Council is currently exploring options for

identifying a second site. Figure 3 illustrates extent of private sector dwellings in the Borough that are occupied by vulnerable (older, disabled) households (asset rich but cash poor). Further, it is estimated that 18% of households in the Borough are in fuel poverty (Housing Strategy 2012).

5C5.18 Appraisal of the Local Plan policies with respect to SA Objective 5 will include the following groups: race, religion and belief, age, language, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity, disability, socio-economic factors, and health, and these will herein be referred to as equalities groups.

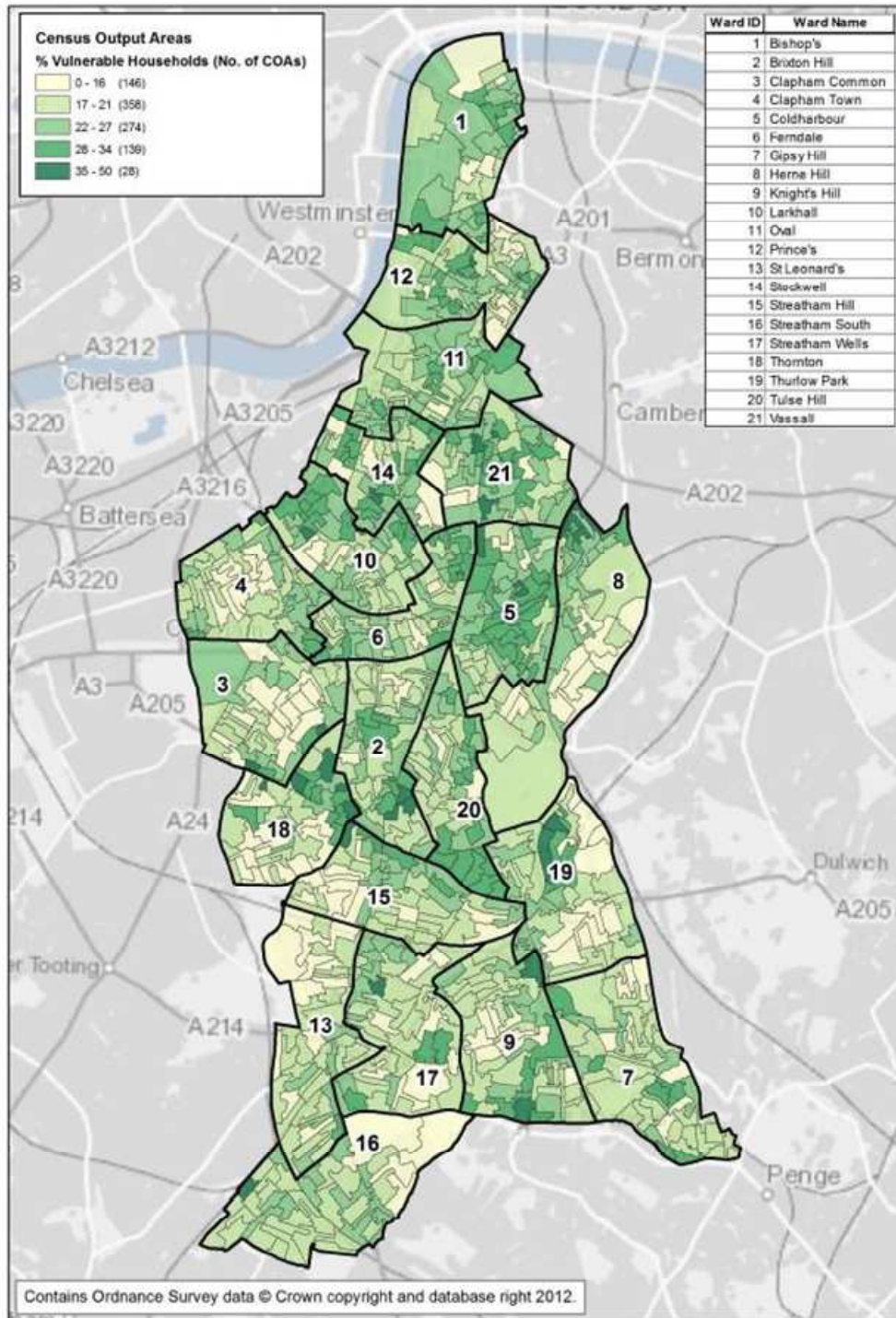


Figure 3: Percentage of private sector dwelling occupied by vulnerable households

Likely evolution without the Plan

- 5C5.19 The London Plan provides good provision of policies for ensuring equal opportunities and social cohesion; however the local context that the new Local Plan offers, in particular on improving job prospects for the young and/or unemployed residents, delivery of affordable housing, housing standards, access to infrastructure and environmental conditions for Lambeth's deprived areas and deprived communities, including regeneration will be lost in the absence of a new Local Plan for Lambeth (although it is recognised that the borough has several SPDs promoting regeneration of major areas).
- 5C5.20 Neighbourhood plans could be prepared. Provided these are in conformity with the National Planning Policy Framework and London Plan, they would likely be adopted and be a material consideration in assessing planning applications.

Assessment of Policies

- 5C5.21 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 5, Equalities. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.
- 5C5.22 The following policies have been screened as having potential for significant effects on this objective:

| | |
|---|---|
| D1 – Delivery and monitoring | T1 – Sustainable travel |
| D2 – Presumption in favour of sustainable development | T2 – Walking |
| D3 – Infrastructure | T3 – Cycling |
| D4 – Planning obligations | T4 – Public transport infrastructure |
| H1 – Maximising housing delivery | T7 – Parking |
| H2 – Delivering affordable housing | T9 – Mini-cabs, taxis and private hire vehicles |
| H3 – Safeguarding existing housing | EN1 – Open space |
| H4 – Housing mix in new developments | EN2 – Local food growing and production |
| H5 – Housing standards | EN3 – Low carbon and renewable energy |
| H6 – House conversions | EN4 – Sustainable design and construction |
| H7 – Student housing | EN5 – Flood risk |
| H8 – Housing to meet specific community needs | Q1 – Inclusive environments |
| H9 – Hostels and houses in multiple occupation | Q3 – Community safety |
| H10 – Gypsy and Traveller needs | Q6 – Urban design – public realm |
| ED1 - KIBAs | Q16 – Shop fronts and signage |
| ED2 – Business use outside KIBAs | PN1 – Waterloo |
| ED6 – Town centres | PN2 – Vauxhall |
| ED7 – Evening economy and food and drink uses | PN3 – Brixton |
| ED9 – A2 uses | PN4 – Streatham |
| ED14 Employment and training | PN5 – Clapham |
| SI1 – Safeguarding existing community facilities | PN6 – Stockwell |
| SI2 – New or improved community facilities | PN7 – West Norwood |
| | PN8 – Kennington / Oval |
| | PN9 - Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and monitoring policies D1 – D4

- 5C5.23 Policies D1- D4 will contribute towards the attainment of SA Objective 5 through

working with a range of partners, delivering regeneration defined in Opportunity Area Planning Frameworks and local area master-plans (and these contain areas of the most deprived parts of Lambeth such as Brixton), including helping to promote and maintain mixed, balanced and diverse communities within neighbourhoods. The Council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth that result in inclusivity and equality of the Borough. Section 106 funding will provide or fund local improvements to infrastructure, including access to facilities, access to employment and affordable housing.

Housing policies H1 – H10

5C5.24 Overall it is considered the housing policies should result in positive effects on SA Objective 5. By increasing the supply and range of housing, including affordable housing of mixed tenures and size, and including accommodation for people with care and support needs; housing provision will likely benefit all equality groups, particularly those on low income levels and requiring specialist housing through providing greater housing choice and availability. An increase in the diversity of housing is likely to contribute to a reduction in overcrowding, which often occurs in less advantaged communities, particularly BME communities, and where renting dominates housing ownership (Replacement London Plan IIA 2009), as it does in Lambeth. It is considered that policy H2 – affordable housing provides for a range of different income levels, from social rent, affordable rent and intermediate provision. 70% of new affordable housing needs to be social/affordable rent which will benefit the lowest income groups of the borough. Affordable housing should be provided on-site and be indistinguishable from other housing, and therefore should result in more equitable outcomes and feelings of social cohesion. However, if this cannot be 'practically achieved', policy states that off-site provision or even a payment in lieu may be permissible. Off site provision would need to be in the borough and within 1 mile of the principal site. This may not necessarily result in 'mixed and balanced communities' and therefore social cohesion may be compromised. A distance of 1 mile can result in a very different neighbourhood and environment. However, taking land values and viability considerations into account, the policy needs to allow some flexibility in the location and provision of affordable housing. Payments in lieu may not directly or immediately result in availability of affordable housing, although it is considered that such payments could contribute to comprehensive and integrated estate regenerations (for example the emerging Estate Regeneration Programme) and supplement the Lambeth Housing Standard fund which may result in more positive effects than developers providing affordable housing just to meet policy requirements.

5C5.25 Net loss of affordable units is resisted unless estate regeneration meets tests outlined in policy H3. Similarly net numbers of existing housing is safeguarded, unless the loss arises from creation of family sized units (which will benefit particular equality groups such as pregnancy and maternity, socio-economic and health groups (mitigating overcrowding) or nursery / childcare provision (which again will benefit parents / families and assist in the work/life balance). To ensure mixed and balanced communities, a range of dwelling types, sizes and tenure is required. Policy H5 expects that homes will be built to Lifetime Homes standards, which will ensure that new homes are suitable for people's changing needs over their lifetimes and that they are wheelchair accessible. Children's play areas will be required in new developments expected to have ten or more children. Policy H8(c) makes further provision for this. For more positive effects with regards to SA Objective 5 and equality outcomes; it is considered that policy encourage at least 10 percent of units as wheelchair accessible, although it is acknowledged that 10 percent is the London Plan standard.

- 5C5.26 While the Local Plan makes provision for student housing; the priority use of land is meeting conventional housing and employment needs. The development of sites for student housing will be carefully managed and specific criteria will need to be met. However, it is not considered that the policy adversely affects student groups.
- 5C5.27 Policy H9 makes provision for new hostels and Houses in Multiple Occupation, and policy H10 sets out a commitment to safeguard the existing site for gypsy and traveller needs, and identify a new site for additional facilities for this group. In response to previous SA recommendation any loss of housing for specific needs/hostels or HMO's needs to be re-provided within the borough which better seeks to enable social cohesion and inclusion in Lambeth. It is considered that these policies contribute positively to achieving SA Objective 5 and the targets set out in Table 4.
- Economic Development policies ED1, ED2, ED6, ED7, ED9, ED10, ED13, ED14***
- 5C5.28 Policies ED1 and ED2 seek to protect and maintain sites and premises in business use thereby maintaining and/or increasing employment opportunities in the Borough and help address worklessness and poverty. Major redevelopment proposals in town centres will also need to re-provide small shop premises on affordable terms, which will contribute to maintaining locally owned businesses and cultural and social values in the retail offer they provide. The policies contribute to increased access to localised employment which will benefit many equalities groups including women and parents in terms of offering a better work and domestic life balance.
- 5C5.29 Policy ED6 seeks to safeguard local shops, specialist shopping and markets to meet community needs, which will support different cultural retail sectors. Through this the policy will assist those who are less mobile, such as older people, disabled people and those on low incomes by having these services accessible and local thereby reducing need to travel. Encouraging new residential development on appropriate sites in town centres and residential above shops also reduces the need to travel, increases accessibility to fresh, local and cultural food, and promotes social cohesion and therefore works to benefit equality groups provided these available on affordable terms. New policy ED10 will have similar positive impacts on equality groups as it seeks to have key local retail uses such as newsagents, chemists, grocers and bakers within walking distance of home, thereby providing increased accessibility for low income groups, the elderly and people with mobility difficulties. The protection of existing indoor and street markets in the borough (policy ED13) provides continued opportunity for access to cheap, fresh and healthy food; supports market holders; and will likely result in positive outcomes for various equality groups.
- 5C5.30 Policy ED7 includes a clause directed at school aged children attending primary or secondary schools and aims to reduce childhood obesity levels. While this particular group has been identified and singled out and it may be argued that the policy does not promote equity or fairness between population groups (i.e. compared against other age groups); it is considered that the wider benefits to children and society generally outweigh any perceived unfairness. In response to previous SA recommendations hot food takeaways within 400m of the primary or secondary school, regardless of their location (i.e. within town centres or not) will not be supported. As a result the policy more positively contributes to the health equality group. A further improvement to the policy as a result of previous SA work is that stopping up of public highway to provide outdoor seating areas for food and drink uses will be resisted, thereby benefiting a number of equality groups (such as elderly, disabled, parents with prams) through appropriate accessibility.

5C5.31 Policy ED9 aims to manage over-concentration of A2 uses, particularly betting shops, pawn brokers and money 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 (i.e. betting shops).

5C5.32 It is considered that policy ED14 should result in positive effects on attainment of SA Objective 5 by helping to ensure local jobs go to local people, and that these people have the necessary skills to partake in the employment opportunities offered by major development in the Borough. It will address worklessness, and poverty, including child poverty as well as provide opportunities for young people (but not limited to just the young) to get work through apprenticeships. It should also help women and caregivers in providing localised employment which can assist in maintaining or improving a better work/life domestic balance.

Social infrastructure policies S1 and S2

5C5.33 Policies S1 and S2 support the provision of social infrastructure which should impact positively on poorer communities and on equality groups. The exception and tests to allow residential accommodation for nursery or childcare use should benefit pregnancy and maternity, facilitating mothers and fathers back into work, tackling worklessness and poverty. Policy S2 states that large residential schemes and comprehensive housing estate regeneration should include social infrastructure and local shops to meet local need and this should result in positive effects for all equality groups, particularly BME groups and those less mobile (disabled, older residents, and low income groups). It is considered the policies provide environments conducive for improved social cohesion and a more inclusive environment for those of different faith, race and language.

Transport policies T1 – T4, T7, T9

5C5.34 Transport policies T1 – T4 promote sustainable travel, including walking, cycling and use of accessible public transport. Policies seek to minimise the need to travel and reduce dependence on the private car which will benefit poorer residents (including those 50% of residents that do not have access to a private vehicle) and those less able to travel. The policies support improvements to public transport services which will be focused on maximising its use especially by people with disabilities, the elderly, young children and others for whom public transport accessibility is a barrier. Other barriers to public transport use will arise if it is too expensive, inconvenient, and unreliable or is felt to be unsafe so it is important the Council lobbies for improvements in these regards as well. In so far as planning policy is able; it is considered that policies T1 – T4 seek to address most of these barriers. Improvements to public transport infrastructure should have positive impacts on equality groups especially if they link deprived neighbourhoods with area of employment opportunity. There is a funding gap for the new station at Brixton and/or Loughborough Junction connecting to the London Overground so effects on equality groups and the wider population of Brixton are less likely to be maximised. The provision of safe (included as result of previous SA recommendation) and secure walking routes should have a positive impact on those who are more likely to suffer harassment in the streets, such as LGBT and BME groups. However, the whole journey experience needs to be accessible from leaving the house to arriving at the desired destination. As paragraph 8.4 states, all journeys, particularly those made by public transport, involve an element of walking. People with disabilities, and powered mobility scooters and wheelchairs users all use (or should be able to use) footpaths as part of their journeys. Pleasingly, previous SA recommendation to include all users of footpaths has been incorporated into the supporting text making clear the policy applies to everyone, including those with disabilities.

5C5.35 Policy T7 on parking makes provision for disabled car parking in line with London Plan requirements. Supporting text paragraph 8.27 has been strengthened in response to previous SA recommendation and makes clear provision of parking spaces for car clubs and pool cars is preferred. Provision of car clubs (aim is for a car club space within 400m of each other) will impact positively on equalities groups, particularly those with no access to a car, those that live in areas of poor public transport accessibility, disabled, older residents, and those on lower incomes / cannot afford to own and run a car. The policy also requires new development to ensure disabled accessible parking is prioritised for lifetime of the development, where in-site parking is provided. Again this provides positive benefits for disability parking permit holders. For those groups that require it, the Local Plan makes provision of mini-cabs, taxis and private hire vehicles which will help address accessibility and safe travel.

Environment policies EN1 - EN5

5C5.36 Policy EN1 seeks to protect existing open spaces, and increase the quantity of open space through proposals including within new development, and contributing to creation of green corridors. Major development in areas of open space deficiency or access to nature deficiency will need to provide on-site provision (or make financial contribution), although it is uncertain whether the policy will directly benefit equality groups living in areas of open space deficiency (outside of new developments). Protection of existing open space and increasing quantity of open space in the Borough helps encourage healthy lifestyles and mental well-being for those equalities groups at greater risk of ill-health (e.g. some children and young people, some older people, some women, some members of ethnic minority communities, people with a history of mental illness). The policy also safeguards cemeteries and burial space in the Borough, which will benefit particular faith groups.

5C5.37 Policy EN2 enables access to cheaper or even free fruit and vegetables which will benefit lower socio-economic groups, reduce poverty and improve health and social inclusion / sense of community. Previous SA recommendation to allow food growing and production on land other than residential have been taken on board to strengthen the policy which results in more positive impacts on equality groups. It is possible under policy EN2 for faith groups to have an area for food growing on their site.

5C5.38 Fuel poverty can be addressed through policies EN3 and EN4 which will help reduce energy bills and benefit lower socio-economic groups, the elderly and other groups struggling to provide a warmer home. In terms of flood risk; the location of housing in relation to health hazards is an important consideration for those who are less able to deal with the impacts of flooding, for example older people, people with disabilities, and children and young people. A key issue will be assessing the potential vulnerability of occupiers in flood risk areas including arrangements for safe access and egress.

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

5C5.39 Policy Q1 inclusive environments is considered a key policy for achieving SA objective 5 and is likely to result in significant positive impacts for disabled people, older people, other people with mobility constraints and children. The Council may wish to clarify that the policy applies to all new development as well as the wider public realm. However, previous SA recommendation for policy Q6 – urban design and public realm (that legibility, permeability and convenient access is for all users) ensures public realm is improved for all users and offers positive benefits in terms of equality groups.

- 5C5.40 Development and alterations to the built environment to create safe and secure environments that reduce crime, fear of crime and anti-social behaviour will benefit all groups but particularly women, the elderly, LBGT and BME groups (policy Q3).
- Places and neighbourhoods policies PN1 – PN10***
- 5C5.41 Waterloo lies to the north of Lambeth's most deprived areas. Policy PN1 should result in positive effects on all equalities groups. The policy aim to promote equitable outcomes and social cohesion through affordable housing, local jobs and training, improving public transport capacity, provision of social infrastructure including health, education, childcare, leisure, and promotion of mixed use developments.
- 5C5.42 Policy PN2 for Vauxhall seeks to create new jobs and homes, opportunities for affordable retail, the establishment of a well-funded community development trust that will further strengthen social infrastructure and play a lead role in nurturing a strong sense of distinctive character in this neighbourhood, and improved transport accessibility and connectivity. While the supporting text to the policy refers to the area supporting a number of LBGT nightlife venues, the needs of this (particularly addressing homophobic crime) and other target equality groups are not specifically referred to in the policy (although designs need be accessible for all, safe and sustainable and accommodate a rich mix of uses and comply with other local plan policies). Similarly the policy itself makes no mention of the active Portuguese community and their independent specialist food and retail outlets.
- 5C5.43 Brixton contains the highest levels of deprivation in the Borough and suffers from high levels of crime and fear of crime. It is also a place of significance to London's African and Caribbean communities. It is considered that Policy PN3 for Brixton should result in positive effects on all equality groups, but particularly for race and faith groups as the distinctive multicultural and diverse town centre is to be safeguarded and promoted through careful and sensitive regeneration. The Brixton market is supported; and there will also be expansion of arts, creative and cultural industries, mixed use developments, protection of employment opportunities, community uses, affordable and flexible workspace and improvements to public realm and public transport. Brixton is an area known for its significant levels of deprivation and the policy seeks to address this in so far as planning policy can influence environmental factors on deprivation levels.
- 5C5.44 Policy PN4 for Streatham should result in positive effects on all equality groups, particularly those in the local area. Accessibility and use of public transport, walking and cycling will be supported through public realm and transport improvements. The policy also supports additional housing to provide a mix of tenures and range of new residential accommodation for new and local residents which suggests this includes C2 class. Additional cultural spaces and outdoor public space sufficient for a market is envisaged for Streatham Central, as well as refurbishment and extension of community facilities which will result in positive impacts for equality groups. Overall it is considered that the policy has a strong community focus.
- 5C5.45 Clapham has issues of deprivation (including Clapham Park Estate, the largest housing estate in the Borough). Clapham also has some of the most expensive housing. The policy for Clapham has a strong cultural, creative and community focus which will help contribute to more equitable outcomes, and achieve better social cohesion, sense of place and identity for local residents which will likely result in positive effects on equality groups.
- 5C5.46 Similarly policy PN6 on Stockwell seeks to create a distinguishable community focus

and heart and a clear physical sense of place supported by its heritage assets. Improvements to and connections between housing estates are proposed which will benefit equality groups, particularly lower socio-economic groups in Stockwell.

- 5C5.47 Policy PN8 also seeks to improve the range and quality of employment and housing, and improve public realm linkages and quality. Policy PN7 for West Norwood seeks to increase the amount and quality of social infrastructure, like education and healthcare. Regeneration and improvement of existing housing estates will be supported as will development that meets educational needs in the Borough. The centre also seeks to provide training and investment schemes, traffic and transport improvements, employment, and community and cultural intensification at the Library and Norwood Hall. This policy has a strong community focus and should result in improved social cohesion and sense of place. Policy PN9 on Herne Hill supports the area as a small community focused district centre. A sense of place through its historic character is encouraged and there are public realm improvements proposed.
- 5C5.48 Policy PN10 for Loughborough Junction seeks to radically improve the physical environment of this deprived community. The policy has been co-produced with the Loughborough Junction Action Group (LJAG). Through the policy the Group aspire to creating an environment where all necessary services are within close walking distance of every home. Local energy efficiency initiatives are proposed which will help combat fuel poverty and other adverse effects this causes (for example physical health, mental wellbeing, reduced productivity).
- 5C5.49 Policy PN11 for Upper Norwood seeks to improve public transport accessibility in the south of the borough by supporting the extension of the Tramlink to Crystal Palace. Currently, delivery of this infrastructure remains uncertain due to funding gaps; however the Local Plan states support for it and should it be delivered would significantly benefits various equality groups.
- 5C5.50 An observation made for all policies (PN1 – PN11) is the reference to improving the environment for pedestrians. Interpretation of this would need to include all users of footpaths, including those in powered wheelchairs or scooters, and not just limited to those literally travelling by foot. The Plan makes mention of this in the supporting text of policy T2.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C5.51 All sites in Table 24 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 5.

Table 23: Significance criteria for SA Objective 5: Equality

| Positive | Negative |
|---|---|
| <ul style="list-style-type: none"> The allocation has the potential to provide new/improved services/facilities, including local employment for deprived areas and areas of opportunity. | <ul style="list-style-type: none"> The allocation will compete with services in deprived areas or in areas of opportunity. |

TABLE 24: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 5: EQUALITY

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|---|---|--|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | <ul style="list-style-type: none"> provides improved services and facilities with regards to health affordable housing provision | | |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | <ul style="list-style-type: none"> provides improved services and facilities in terms of education (school places) | | |
| 3 | Vale Street Depot, Vale Street SE27 | <ul style="list-style-type: none"> preferred use of site is education or housing and retention of reuse and recycling centre. The site is in an area of identified need for additional school places so this use would provide improved services and facilities with regards to education. Housing would also benefit equalities groups | | |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> Preferred use of site is education and therefore improves access to services and facilities, particularly for young people and families. | | |
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> mixed use development of residential and office further enhances area of opportunity | <ul style="list-style-type: none"> does not specifically state affordable housing* | Compliance with other Local Plan policies including H2 |
| 6 | Shell Centre, 2-8 York Road SE1 | <ul style="list-style-type: none"> mixed use development of office, residential, including affordable housing, cultural, sport, leisure and police facility enhances area of opportunity | | |
| 7 | Waterloo Station, Waterloo Road SE1 | <ul style="list-style-type: none"> enhances area of opportunity and seeks to increase transport capacity | | |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | <ul style="list-style-type: none"> mixed use development including residential and commercial and replacement bus garage | <ul style="list-style-type: none"> does not specifically state affordable housing | Compliance with other Local Plan policies including H2 |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | <ul style="list-style-type: none"> mixed use development of office, residential, including affordable housing, new playground | | |

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|----|--|--|---|--|
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | - provides improved services and facilities with regards to community facilities (fire service) and residential and employment in an area with some deprivation | | |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | - mixed use development site with employment and residential and potential location for a new primary school - provides improved services and facilities with regards to school places - site in an area with some deprivation | - does not specifically states affordable housing | Compliance with other Local Plan policies including H2 |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | - mixed use development site – town centre led with employment, community uses and residential - new hostel provision - Site provides improved services and facilities to deprived area and seeks to create an area of opportunity | - does not specifically states affordable housing | Compliance with other Local Plan policies including H2 |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | - town centre led mixed use development site with retail and residential in deprived area and the site seeks to create an area of opportunity - local employment opportunities in retail provision | - does not specifically states affordable housing | Compliance with other Local Plan policies including H2 |
| 14 | Somerleyton Road SW9 | - mixed use development site of residential, employment, community facilities, social enterprise in a very deprived area of the Borough. - provides improved services and facilities - local employment potential in deprived area | - does not specifically states affordable housing | Compliance with other Local Plan policies including H2 |
| 15 | Popes Road SW9 | - mixed use development site of residential, commercial, community facilities, and leisure in a very deprived area of the Borough. - local employment opportunities in deprived area - provides improved services and facilities | - does not specifically states affordable housing | Compliance with other Local Plan policies including H2 |
| 16 | Brixton Central (between the viaducts) SW9 | - provides improved services and facilities in terms of public realm, mixed use retail and workspace, food and drink, leisure and recreation - provision of student housing | | |
| 17 | 'Your New Town Hall' SW2 | - redevelopment of site to provide additional community facilities, retail, residential and employment floorspace - provides improved services and facilities - local employment opportunities in deprived area | - does not specifically states affordable housing | Compliance with other Local Plan policies including H2 |
| 18 | 286 - 362 Norwood Road SE27 | - retail led mixed use development of housing, community uses and start up accommodation for small businesses | - does not specifically states affordable housing | Compliance with other Local Plan policies including H2 |

*Some of the site allocations specifically mention provision of affordable housing where residential use is proposed for the site, while other site allocations do not. All site allocations will be subject to Local Plan policies. It is recommended that the Council review this inconsistency.
Council response: The Affordable Housing policy applies across the borough, including all site allocations. For consistency and improved clarity, reference to affordable housing in site allocations is now removed.

Summary of Local Plan policies and site allocations

5C5.52 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan policies and site allocations will have a positive effect albeit with some element of uncertainty on the recognising the existing baseline and in encouraging a sense of place, community identity and belonging.

Table 25: Summary assessment of effects of Local Plan on Equality

| Assessment of effects of Local Plan on SA objective 5 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|--|-------|--|--|---|
| To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion | + / ? | <p>Generally, it is considered that the Local Plan contains good provisions for ensuring equitable outcomes for all communities and achieving mixed and balanced communities. However, there is some uncertainty in the timely delivery of necessary infrastructure to support development. The Local Plan seeks to improve environmental conditions for Lambeth's deprived communities and areas, for example Brixton, Stockwell, Loughborough Junction. Policies seek to reduce poverty through a number of measures such as affordable housing, energy efficient homes and buildings, improved access to local employment and skills and training schemes and improved access to transport and daily amenities.</p> <p>It is also considered that the Plan contains good provisions for ensuring community services and facilities are provided and accessible to everyone. Perhaps the temporary exception to this involves construction works and development that may cause an element of temporary disruption to those with disabilities.</p> <p>Most of the site allocations promote mixed use developments which will help foster mixed and balanced communities as well as provide accessible services, facilities and opportunities for employment.</p> | <p>It is likely that positive effects on equality groups, particularly on improved housing (combating fuel poverty) and affordable housing as well as wider housing choices (specific to individual needs (i.e. vulnerable people) and demands (more family sized housing combating overcrowded conditions)) will be evident as new developments and are delivered. Supporting infrastructure (schools, health, transport, community facilities, open space) will be required but this needs to be delivered ahead of developments being occupied, and there is some uncertainty given the economic climate whether developers will be able to deliver this in such a timely manner.</p> | <p>Permanent</p> <p>Possible temporary disruption to those with disabilities with improvements to public realm.</p> |

Recommendations for monitoring likely uncertain effects

5C5.53 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

§ Annual update of infrastructure programmes schedule.

6. HOUSING

5C6.1 This section of the SA relates to the sustainability performance of the Local Plan against:

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

5C6.2 To achieve objective 6 plan policies should increase access to good housing, meet affordable housing targets, meet sustainable housing standards, increase the mix and type of housing, including family units, reduce actual noise level and disturbances from noise, and tackle homelessness.

Relevant Policy Objectives

National Level

5C6.3 Paragraphs 47 to 53 of the *National Planning Policy Framework 2012* contain housing policies applicable to the Lambeth Borough. They provide policy on significantly boosting the supply of housing; Local Plans need to meet the full objectively assessed needs for market and affordable housing, and identify a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%.

5C6.4 The *Code for Sustainable Homes* is the national standard for the sustainable design and construction of new homes. The Government sets out standards in terms of energy efficiency (above those in the current building regulations) and sustainability. Standards include matters with respect to CO2 emissions, water, materials, waste, health and well-being, ecology and management.

Regional Level

5C6.5 The *London Plan 2011* contains a raft of housing policies on minimum borough housing annual average targets, optimising housing potential, housing design, choice (including gypsies and travellers), tenures, and affordability targets (including how to negotiate affordable housing on private and mixed use schemes).

5C6.6 The Mayor of London is producing a revised London Housing Strategy. This was published for consultation in December 2011 and consultations closed March 2012. The revised strategy looks further at enhancing mobility and choice, tackling housing need and rough sleeping, and improving options for home ownership.

5C6.7 The London Housing Design Guide 2010 sets out the Mayor of London's aspirations for the design of new housing in the capital. It clarifies, consolidates and sets new minimum space standards in a number of key policy areas. It promotes better neighbourhoods, high environmental standards, better accessibility and better design and includes new minimum standards for the amount of floor space and private outdoor space, as well as guidance on natural light and ceiling heights.

Local Level

5C6.8 The Lambeth Housing Strategy 2012-2016 sets out the priorities for housing in Lambeth for the next four years as well as year one's delivery plan. The Strategy focuses on three priority areas: Place - the role housing plays in making Lambeth a great place to live, work and visit; Property - the importance of good quality homes in Lambeth; and People - The role housing plays in improving the lives of those who live in it. The strategy is also underpinned by an updated Housing Needs Assessment.

Baseline conditions and existing issues

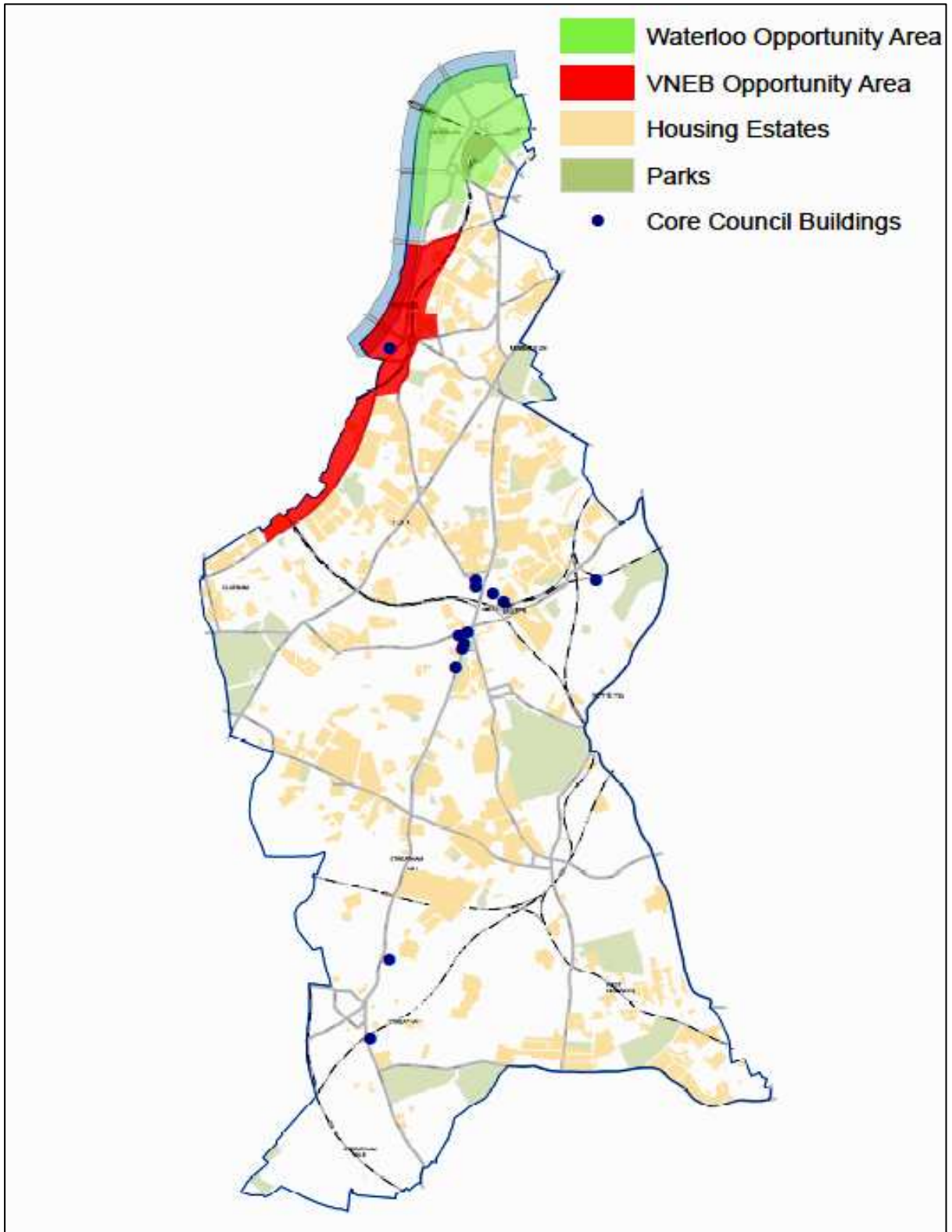
- 5C6.9 Lambeth's housing stock is typical of inner London, with a large proportion of flats – 73% in total of which about two thirds are purpose built and one third conversions – and a correspondingly small proportion of houses (Lambeth Residential Conversions Study 2009). Lambeth is in the top 20 districts nationally for proportion of shared ownership, council rented and private rented, and amongst the lowest for owner occupiers and mortgagees (Census 2011). There has been a marked decrease in the proportion of households renting from the Council from 29% (2001) to 20% (2011) and an increase in the proportion renting privately from 18% to 28%.
- 5C6.10 Lambeth's household composition profile is very similar to Inner London generally, with a high proportion of single person households, non-family households, and lone parents with dependent children. It has a low proportion of married / civil partnership families with children, and a low proportion of households wholly of people aged 65+. It is the highest number of non-family households (e.g. young people sharing flats) (Census 2011). There are around 130,000 households in Lambeth (Census 2011). Average household size in London increased from 2.35 persons in 2001 to 2.47 persons in 2011, buckling assumptions that average household size is generally in decline. Average household size increased in every London borough (Census 2011).
- 5C6.11 There is an urgent need for more affordable housing in Lambeth, especially for families. Over 1,750 new build affordable units have been completed over the past five years, yet there remains a significant shortfall in the availability of affordable accommodation, and a particularly pressing need to increase the amount of family sized affordable housing. In 2010/11 a total of 1,289 dwellings were completed. In addition 313 vacant dwellings were returned to use. The development 'pipeline' consisting of homes under construction and sites with unimplemented planning permissions totalled 5,545 at the end of 2010/11. Of the 1289 net completions, 694 were affordable, representing 54 per cent of net completions, and 50 per cent of gross completions, being affordable.
- 5C6.12 The number of people who have applied for social housing in Lambeth (excluding transfers from Council own and/or housing association stock) has increased by over 75% since 2006 – to 27,000 in March 2012. In December 2011 just over 9,000 households in Lambeth (6.8%) received housing benefit support to live in the private rented sector. The number of housing benefit claimants in the private rented sector increased by close to 200 people between February and December 2011, when changes to the Local Housing Allowance started to take effect. Over 60% of those living in council stock receive housing benefit.
- 5C6.13 Lambeth's 2012 Housing Needs Survey identifies an overall housing requirement across all tenures of 23,900 homes, to 2030. Of this, 67% is a need for social rented housing. In terms of mix, the survey suggests that the greatest overall requirement is for smaller (1 and 2 bed units) units (39% and 32% respectively). This reflects changing household composition, with one person households expected to account for 71% of household growth from 2011-31 (Lambeth Housing Strategy 2012).
- 5C6.14 While overcrowding has reduced from 26% to 22% over the last 10 years; Lambeth is amongst the worst nationally for households with too few rooms (Census 2011). There has also been a reduction in the proportion of terraced houses from 19% to 16%, and an increase in converted or shared flats from 45% to 49% over the last 10 years (Census 2011).

- 5C6.15 The average house price in Lambeth in March 2012 was £355,000. The average weekly private rent for a two-bed property in Lambeth is £288. Medium-high income households make up 26% of Lambeth's households. Low-medium income households make up 41% of all households. 32% of households are low income. Over 31% of all non homeowners in Lambeth have annual incomes of less than £20,000 (Lambeth Housing Strategy 2012).
- 5C6.16 Currently there are very few supported housing options available for adults with physical and / or sensory impairment who live in Lambeth, and limited access to specialised housing through, for example, shared ownership options. This has resulted in Lambeth having one of the highest levels of adults with physical and / or sensory impairment living in residential and nursing care homes in London (Housing Strategy 2012).
- 5C6.17 Lambeth Council owns 14% of land in the Borough and Figure 4 illustrates housing estates in the Borough. 969 households were accepted as homeless in 2011/12. Since April 2011 80-90% of new rough sleepers have not had more than one night sleeping rough (Housing Strategy 2012).
- 5C6.18 Existing purpose-built student accommodation in Lambeth provides 760 bedspaces at four locations, all of which are in the north of the borough. Over the past two years Lambeth has experienced an increasing number of development proposals for purpose built student accommodation.

Likely evolution without the Plan

- 5C6.19 It is considered that the housing information in the Core Strategy is out of date with regards to student accommodation and affordable housing. Changing development pressures, such as several major proposals in recent months for student housing, particularly in Vauxhall (for example Tinworth Street, South Lambeth Road); the reality of negotiating affordable housing contributions on major sites (for example Elizabeth House in Waterloo, Sainsbury's on Wandsworth Road, Eastbury House on Albert Embankment); and the ongoing need to balance the supply of land for both housing delivery and economic growth has strengthened the need for an updated Local Plan. The London Plan sets a housing delivery target of 11950 new dwellings until 2021, and in the absence of a new Local Plan the target is unlikely to be achieved, delivery is likely to be ad hoc and may not necessarily deliver the type and size of housing needed for the Borough, in the right locations.
- 5C6.20 There is an increasing demand for housing and especially affordable and sustainable housing within the Borough. Absence of the Local Plan would not likely deliver the amount of affordable housing needed in the right locations in the Borough. There are a high proportion of apartments within Lambeth. Different types and sizes of housing are needed and intervention would be required in order to deliver this.

Figure 4: Housing Estates in the Borough and Opportunity Areas



Housing Strategy 2012

Assessment of Policies

5C6.21 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 6, Housing. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.

5C6.22 The following policies have been screened as having potential for significant effects on this objective:

| | |
|---|---|
| D1 – Delivery and monitoring | T9 – Mini-cabs, taxis and private hire vehicles |
| D2 – Presumption in favour of sustainable development | EN4 – Sustainable design and construction |
| D3 – Infrastructure | Q1 – Access for disabled people |
| D4 – Planning obligations | Q2 – Amenity |
| H1 – Maximising housing delivery | Q7 – Urban design / new development |
| H2 – Delivering affordable housing | Q9 – Landscaping |
| H3 – Safeguarding existing housing | Q11 – Building alternations and extensions |
| H4 – Housing mix in new developments | Q12 – Refuse / recycling storage |
| H5 – Housing standards | Q14 – Development in gardens |
| H6 – House conversions | Q20 – Statutory listed buildings |
| H7 – Student housing | Q22 – Conservation Areas |
| H8 – Housing to meet specific community needs | PN1 – Waterloo |
| H9 – Hostels and houses in multiple occupation | PN2 – Vauxhall |
| H10 – Gypsy and Traveller needs | PN3 – Brixton |
| ED2 – Business uses outside KIBAs | PN4 – Streatham |
| ED4 – Work-live development | PN5 – Clapham |
| ED6 – Town centres | PN6 – Stockwell |
| ED12 – Hotels and other visitor accommodation | PN7 – West Norwood |
| SI2 – New or improved community facilities | PN8 – Kennington / Oval |
| T8 – Servicing | PN9 – Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and monitoring policies D1 – D4

5C6.23 Overall policies D1 – D4 should result in positive effects on SA Objective 6, in particular use of previously developed land and vacant buildings, and planning obligations that secure affordable housing.

Housing policies H1 – H10

5C6.24 Policy H1 seeks to maximise the number of additional housing in the Borough to meet and exceed London Plan targets. This will include estate renewal and regeneration schemes as well as maximising affordable housing delivery. Accordingly, it is considered that the policy should result in significant positive effects for SA Objective 6, in particular increasing access to good housing; however the success of the policy is dependent on delivery of completions, which is somewhat questionable under current economic conditions. From 2005/06 to 2010/11 housing targets have been consistently met. However in 2011/12 the target of 1195 additional units was not met by 347 residential units. In addition there were 2150 outstanding unimplemented planning permissions for residential units.

5C6.25 Policy H2 states that on sites of at least 0.1 hectares or capable of accommodating 10 or more homes at least 50 percent of units (with public subsidy) and at least 40 percent (without public subsidy) should be affordable. In response the previous SA recommendation, clarification is provided in the Plan on how a site is defined as being capable of accommodating such dwellings. The policy also distinguishes between social and affordable rent and intermediate provision thereby seeking to make provision for a greater range of people to afford a decent home.

- 5C6.26 Clause (a)(ii) of policy H2 helps secure even more affordable housing in the Borough by seeking financial contributions from sites providing fewer than 10 residential units. In response to previous SA recommendation, clause (e) has been strengthened to ensure affordable housing complies with the preferred mix of housing and appropriate rental levels for low income households.
- 5C6.27 The comments made in the appraisal against SA Objective 5 on the challenges of achieving mixed and balanced communities if affordable housing is provided off-site (within 1 mile of development site) remain relevant against SA Objective 6. Affordable housing provided off-site should be supported by appropriate social, physical and green infrastructure and in response to this previous SA recommendation, green infrastructure has now been included to policy H2.
- 5C6.28 Overall it is considered that policy H2 will result in everyone having the opportunity for an affordable home. Through the policy, affordable housing targets should be met however; deliverability of housing completions may be uncertain, at least in the short term with the current economic climate.
- 5C6.29 Policy H3 makes provision for existing housing including affordable housing to be safeguarded and loss to be resisted except if specific tests are met. It is considered that policy H3 should result in significant positive effects in attaining SA Objective 6, particularly by increasing access to good housing, meeting affordable housing targets, and increasing the mix and type of housing including family units. This policy also supports proposals that bring back into use long term empty or derelict homes. This helps ensure sufficient housing is provided and will also maximise use of existing infrastructure and minimise resource consumption.
- 5C6.30 Policy H4 seeks to increase the mix and type of housing, including family housing, and overall should result in significant positive effects in attaining SA Objective 6. The value of the word 'normally' in clause (a)(ii) on market housing was questioned in the previous SA. Clause (a)(ii) states that a balanced mix of unit sizes including family sized accommodation *should normally* be provided (emphasis added). Paragraph 5.21 states 'in all cases proposals will be expected to demonstrate that the provision of family units has been *maximised* (emphasis added) and paragraph 5.20 states a range of dwelling sizes *including family sized housing will be sought* from all new developments. The council response to the previous SA recommendation was that the current wording ("normally") recognises there may be instances where family-sized market accommodation is not appropriate – for example due to site constraints, or where due to scheme viability smaller market units would deliver higher levels of affordable housing. While this is noted, it is considered that use of the word 'should' in clause (ii) allows for the flexibility in the mix of unit sizes (as provided for in the first sentence of paragraph 5.21). It is considered that by removing the word 'normally', clause (a)(ii) better reflects the supporting text of paragraph 5.21 and will ensure family sized housing is provided in all market housing schemes. SA Objective 6 targets set out in Table 4 seek to increase mix and type of housing, including family units.

SA Recommendation: It is considered that more positive effects for housing, particularly the mix and type – specifically family housing, if the word 'normally' is removed from the policy.

Council response: Agreed – the word normally has been removed from policy H4(a)(ii).

5C6.4.9 Policy H5 is on housing standards and applies to new residential development including new-build dwellings, conversions and change of use scheme where new dwellings are created. Location dependent, the provision of the children's play space may impact adversely on some residents in terms of noise levels. This will need to be carefully managed as children's play space should be located in areas of good and safe accessibility and surveillance.

5C6.31 It is considered that policy H6 on house conversions effectively seeks to retain family sized homes, and manage environmental effects such as noise, refuse storage, parking that result from conversions into smaller flats.

5C6.32 Policy H7 seeks to ensure that students have the opportunity for an affordable decent home. Rental levels of the accommodation will need to be supported by the Higher Education Institution to which the housing is linked to. The policy seeks to protect areas from overconcentration of student and similar housing that may be detrimental to residential amenity.

5C6.33 Policy H8 will likely result in significant positive effects as it provides housing specific to community needs and to those most disadvantaged and vulnerable, such as sheltered housing with care support, people with mental health or learning difficulties, residential care and nursing care homes, and extra care housing. The policy also seeks to provide housing capable of adaptations to enable residents to live independently and safely in their own homes. Where there is a loss of this housing proposed, the existing accommodation should be re-provided on site or elsewhere within the Borough.

5C6.34 Policy H9 will also likely result in significant positive effects as it makes provision for those people who cannot afford self-contained accommodation and therefore seeks to address homelessness provided such housing proposals are delivered. Policy H10 for gypsy and traveller needs recognises that an additional site is required, however such a site has not yet been identified. Given the limited supply of land in the Borough, additional provision for gypsy and traveller pitches will be challenging. However, the policy itself provides good criteria to identify a suitable site, both for intended occupiers, and existing residents in the local area of any future pitch site.

Economic development policies ED4, ED6 and ED12

5C6.35 Policy ED4 provides for work-live developments offering flexible use of buildings and space to allow both work and living within them. Previous SA recommendations to improve residential amenity have been incorporated, strengthening the policy and increasing the likelihood of positive effects results in terms of SA Objective 6. The policy states that work-live development will not be supported in KIBAs. This approach is considered reasonable given other policies in the Local Plan and makes sense in terms of achieving SA Objective 6. In response to previous SA recommendation, provision for residential development within town centres (policy ED6) is provided for in certain circumstances (for example appropriate sites or underused space above shops). In terms of managing effects it is considered that residential uses is appropriate above ground floor, rather than limited to 'above shops'. This would provide a raft of significant positive effects including housing targets, accessibility to key services and facilities, improved safety and reduced crime (passive surveillance), improved economy and viability of town centres. It is therefore recommended that 'shops' is replaced with 'ground floor' in policy ED6(a) last bullet point.

SA Recommendation: more positive effects would result in terms of SA Objective 6 (and also other SA objectives such as 7, 2, 3) if provision of residential accommodation was provided above ground floor, rather than just 'shops'.

Council response: Agreed – the policy has been changed with 'shops' replaced with 'ground floor units'.

5C6.36 It is recommended that the Local Plan make provision and promote residential above ground floor in town centres provided that the primary retail core and commercial functions are not prejudiced. This complements places and neighbourhoods policies which promote mixed use development in town centres including housing. If this is the intention of clause (c) policy ED7 then the supporting text should make this clearer.

5C6.37 Policy ED12 is on hotels and other visitor accommodation (C1 use class). Previous SA recommendation has clarified and strengthened the policy so that hotel, apart-hotels and other visitor accommodation (C1) are supported in the main centres of the borough, and other smaller scale provision is supported elsewhere in the borough with PTAL 4 or more.

Social Infrastructure policy S2

5C6.38 In exceptional cases, loss of residential accommodation for a nursery or childcare use may be acceptable provided certain tests are met (policy H3 makes reference to this also). A concern of this policy is the noise effects that may result from the change in use and its associated impact of residential amenity and 'quiet enjoyment' of the home. However, development proposals would need to comply with policy Q2 Amenity, although the Council may wish include reference / acknowledgement of this in the supporting text of policy S2.

Transport policies T8 and T9

5C6.39 Servicing of sites / developments can impact adversely the amenity of an area and these effects may not be limited to just adjoining properties, for example, noise or lighting effects. To protect amenity and in particular residential and other sensitive uses of the wider area previous SA work recommended that the last part of clause (a) of policy T8 applied to adjacent properties rather than adjoining. Council response to this recommendation was *'the policy wording covers the concern to protect residential amenity of adjacent properties – the supporting text explains the reason. No need to change.'* However this SA analysis again considers that negative impacts on adjacent properties could result with current wording. 'Adjoining properties' means those sharing a boundary with the site and does not include across road or properties one site away from the development site. If the adjoining properties are not sensitive uses or are unaffected from servicing and the effects this generates, then the policy will be deemed as met. Policies Q2 Amenity and Q7 urban design of new development may be useful to protect amenity of adjacent properties, but it is considered that previous SA recommendation remains relevant and necessary to more effectively reduce the likelihood of adverse effects on the surrounding area amenity. Accordingly the word 'adjoining' should be replaced with 'adjacent'. This would make the policy more consistent with policy Q7(viii).

5C6.40 Additionally, previous SA recommendation regarding 'location' in clause (a) and application of clause (c) remain relevant. Use of the word 'location' also suggests consideration of an area wider than those adjoining the subject site. Similarly, the

spatial extent of clause (c) is unclear. In line with the above recommendation the Construction Logistics Plan should demonstrate how environmental, traffic and amenity impacts will be minimised for the surrounding area. This may need to be explicitly stated in the supporting text.

- 5C6.41 Policy T9 on mini-cabs, taxis and private hire vehicles also seeks to protect residential amenity, and the supporting text states that traffic impacts will not be diverted onto surrounding streets, particularly residential areas. This further supports the above recommendations on managing impact on amenity of adjacent properties rather than adjoining properties only.

SA Recommendation: It is recommended that the last part of clause (a) of policy T8 is amended as follows:

‘...appropriate and acceptable in terms of impact on amenity of *adjacent* properties and road and traffic conditions of the location.’

Council response: Agreed policy T8(a) has been changed

SA Recommendation: Proposals for new taxi ranks should not be permitted where they would cause unacceptable harm to areas other than residential.

Council response: Agreed, ‘or wider area’ has been inserted to policy T9(b)

Environment and green infrastructure policy EN4

- 5C6.42 Policy EN4 has been significantly improved in response to previous SA recommendations and now expects higher standards of sustainability in developments. The policy states that all new homes approved before April 2014 are required to meet at least Code for Sustainable Homes Level 4 with a minimum score of 76%. BREEAM Domestic Refurbishment and new build standards have been increased to ‘Excellent’ rating unless demonstrated technically infeasible or unviable. Given the plan period of 15 years, these standards are considered much more appropriate and in line with governments target of zero carbon buildings. These higher quality more sustainable homes are likely to result in more positive effects for residents in terms of SA Objective 6 and providing warm, decent homes. Previous SA recommendation that ‘the supporting text should make clear that the policy will be regularly reviewed during the plan period with the aim of increasing standards’ has been considered by the Council and the response was that further detailed guidance will be provided in the Sustainable Design and Construction SPD. It is questioned whether the policy allows the flexibility of seeking higher standards, for example BREEAM ‘Outstanding’. Inserting the words ‘at least’ may result in more positive effects in terms of sustainability than current wording. It is recommended this is reviewed by the Council.

SA Recommendation: Ensure the policy has flexibility to seek highest standards of sustainability (e.g. BREEAM Outstanding) if the Sustainable Design and Construction SPD suggests this, particularly during later stages of plan period as technologies evolve and costs decrease.

Council response: Agreed, the words ‘at least’ have been added to clauses (b)(ii)-(iv)

Quality of Built Environment policies Q1, Q2, Q9, Q11, Q12, Q14, Q20, Q22

- 5C6.43 Policy Q1 ensures that new dwellings are built to lifetime homes standards and are in

line with GLA best guidance for wheelchair housing. In response to previous SA recommendations policy Q2 has been improved with regards to privacy, outlooks, odour and disturbance (from service equipment) and the policy now is more likely to result in more positive effects in terms of SA Objective 6 and quiet enjoyment of homes and better local amenity. Policy Q9 makes provision for landscape design scheme and management and maintenance programmes for all residential developments (although it is considered that such schemes should be required for all applications not just residential developments). Landscaping improves residential amenity and enjoyment of homes and neighbourhoods and therefore policy Q9 will result in positive effects on SA Objective 6. Similarly policy Q11 should ensure extensions and building alterations are sympathetic to the design and character of the host building, locally distinct forms and heritage assets, including front gardens. Policy Q12 on refuse and recycling storage also seeks to protect residential amenity as does policy Q14 which does not support development in front gardens or prominent corner or side gardens; and there are specific requirements for proposals in rear gardens and undeveloped back-land sites in order to protect amenity and habitat values of these spaces.

5C6.44 The vast majority of listed buildings in Lambeth are residential terraces, semidetached houses and villas. Policy Q20 seeks to preserve and sustain the special interest and settings of these listed buildings, allowing people to enjoy their home and the local amenity in which they bought into. Policy Q22 on conservation areas also seeks to preserve and enhance the character or appearance of conservation areas, and will therefore result in positive effects on SA Objective 6, particularly for residents who have chosen to live within conservation areas because of the character and amenity that the environment offers. However, for some people, the policies may prohibit or impose limitations on any expansion of their home and therefore for some people the policies may not necessarily lead to enjoyment of their home. Overall, it is considered that the policies appropriately protect local amenity of residential areas.

Places and neighbourhoods policies PN1 – PN11

5C6.45 All places and neighbourhoods will need to comply with housing policies of the Local Plan. In Waterloo it is noted there may be tensions between the cultural / tourism / entertainment uses of the area and residential amenity, although it is considered this can be appropriately managed, for example, through suitable design and partnership working.

5C6.46 Housing is potentially an appropriate use within town centres, subject to relevant town centre policies. Some places and neighbourhoods policies specifically include provision of additional housing for example Waterloo, Vauxhall (3500 new homes), Brixton and Streatham support the inclusion of housing as part of a mixed use development is supported. Housing is supported to provide a vibrant district centre role in West Norwood area. Opportunities for new housing development will be supported on suitable sites.

5C6.47 Coupled with all housing policies, it is considered that the places and neighbourhoods policies should result in positive effects for SA Objective 6, particularly in increasing access to good housing.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C6.48 All sites in Table 27 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 6.

Table 26: Significance criteria for SA Objective 6: Housing

| Positive | Negative |
|--|--|
| <ul style="list-style-type: none">Provides new housing, including affordable housing, and a mix of housing types (including family units) in sustainable locations and sustainably designed. | <ul style="list-style-type: none">Is likely to restrict the provision and variety of new sustainable affordable housing. |

TABLE 27: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 6: HOUSING

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|---|--|---|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | <ul style="list-style-type: none"> - health use with replacement of affordable housing - sustainable location with exceptional public transport links | <ul style="list-style-type: none"> - no net increase in housing - housing mix not stipulated | <ul style="list-style-type: none"> - compliance with housing policies in particular H4 on housing mix |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | <ul style="list-style-type: none"> - While preferred use is for education; site has been included in the SHLAA as a potential housing site (part of the site has planning permission for 100% affordable housing) - development on the site need to respect the amenity of the adjoining residential properties - design principles requires due consideration to the protection of the neighbouring residents in terms of visual intrusion, overbearing impact, loss of light, privacy, noise and disturbance | <ul style="list-style-type: none"> - preferred use of site is not for housing | <ul style="list-style-type: none"> - it is recommended that key design principles are amended so that adjacent properties are protected from impacts of education use in terms of amenity (rather than just the adjoining residents). - compliance with Local Plan housing and quality of built environment policies |
| 3 | Vale Street Depot, Vale Street SE27 | <ul style="list-style-type: none"> - preferred use of site is for education or housing and retention of the reuse and recycling centre - design principles requires due consideration to the protection of the neighbouring residents in terms of visual intrusion, overbearing impact, loss of light, privacy, noise and disturbance; and respects the amenity of the adjoining residential properties | <ul style="list-style-type: none"> - housing may not be delivered on the site but school places are also a priority planning issues for the Borough - should the site be developed for housing; the site allocation does not specifically mention affordable housing provision nor housing mix | <ul style="list-style-type: none"> - it is recommended that key design principles are amended so that adjacent properties are protected in terms of amenity (rather than just the adjoining residents). - compliance with Local Plan housing and quality of built environment policies, in particular policies H2 and H4. |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> - Preferred use for education with potential for enabling residential development. | <ul style="list-style-type: none"> - housing may not necessarily be delivered on the site (or at least in short term) but school places are also a priority planning - preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size | <ul style="list-style-type: none"> - compliance with Local Plan housing and quality of built environment policies, in particular policies H2 and H4. |
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> - preferred use of site is office led development with residential so would provide new housing provision - sustainable location with good access to community facilities and public transport | <ul style="list-style-type: none"> - preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size | <ul style="list-style-type: none"> - compliance with Local Plan housing and quality of built environment policies, in particular policies H2 and H4. |
| 6 | Shell Centre, 2-8 | <ul style="list-style-type: none"> - preferred use of site is mixed use employment led development | <ul style="list-style-type: none"> - preferred amount of residential not provided | <ul style="list-style-type: none"> - compliance with Local Plan |

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| | | | | |
|----|--|---|--|--|
| | York Road SE1 | with residential, including affordable housing, so new housing provision - sustainable location with good access to community facilities and public transport | - does not specifically states provision mixed tenure and size | housing and quality of built environment policies, in particular policy H4. |
| 7 | Waterloo Station, Waterloo Road SE1 | - site identified as a potential housing site in the SHLAA | - preferred use of site is for railway terminal and transport interchange, ground floor active uses, retail and office with a new city square - no housing provision proposed but site is not necessarily suited to housing | |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | - preferred use of site is mix of central London activities including residential (at rear and on upper floors) - sustainable location with good access to community facilities and public transport | - preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size | - compliance with Local Plan housing and quality of built environment policies, in particular policies H2 and H4. |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | - preferred use is mixed use development including residential and affordable housing | | |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | - preferred use of site is retention of operational fire station and mixed of uses including residential and employment - design principles seek to ensure both existing and new residential amenity is protected and new dwellings are located away from the viaduct; and that the development provides a mixed and balanced community with an acceptable mix, tenure split/distribution of residential accommodation - sustainable location with good access to community facilities and public transport | - preferred amount of residential not provided - potential conflicts with fire station and residential uses on same site/in close proximity | - compliance with Local Plan housing and quality of built environment policies - site allocation makes clear that residential amenity should be protected |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | - preferred use is mixed use development including residential, and potential location for a school - design principles seek to ensure amenity of new residential development is protected from noise, pollution and vibration from the railway viaduct; and dual aspect residential units in blocks adjacent to the railway viaduct; and protects the amenity of existing residential development - sustainable location with good access to community facilities and public transport | - preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size | - compliance with Local Plan housing and quality of built environment policies, in particular policies H2 and H4. |
| 12 | Land bounded by Wandsworth Road to the west, | - preferred use is town centre led mixed use development with residential on the upper floors - design principles seek to ensure amenity of new residential | - preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size | - compliance with Local Plan housing and quality of built environment policies, in |

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| | | | | |
|----|---|--|---|---|
| | Parry Street to the north, Bondway and the railway viaduct to the east SW8 | development is protected from noise, pollution and vibration from the railway viaduct; and dual aspect residential units in blocks adjacent to the railway viaduct - sustainable location with good access to community facilities and public transport | | particular policies H2 and H4. |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | - preferred use of site is town centre mixed use development with residential on upper floors - sustainable location with good access to community facilities and public transport | - preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size | - compliance with Local Plan housing and quality of built environment policies, in particular policies H2 and H4. |
| 14 | Somerleyton Road SW9 | - preferred use of site includes mixed use development of residential, employment, community facilities and open space - sustainable location with good access to community facilities and public transport - key design principles support development that protects amenity of existing residential developments, and ensures any new dwellings are dual aspect | - potential for housing decant on part of the site - preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size | - new housing development should result in net increase of housing provision on the site - compliance with Local Plan housing and quality of built environment policies, in particular policies H2 and H4. |
| 15 | Popes Road SW9 | - preferred use of the site is for mixed use development with retail, commercial, community, leisure, residential, and town centre car and cycle parking - sustainable location with good access to community facilities and public transport - key design principles support development that provides dual aspect residential units fronting onto Brixton Station Road; protects the residential amenity of the adjoining Canterbury Gardens estate; and protects the character of the adjoining conservation area and setting of the listed former St John's School | - preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size | - compliance with Local Plan housing and quality of built environment policies, in particular policies H2 and H4. |
| 16 | Brixton Central (between the viaducts) SW9 | - site identified as having potential for student housing - sustainable location with good access to community facilities and public transport - design principles will support development that proposes low building to protect the amenity of new residential development on Coldharbour Lane adjoining the site | - no housing provision proposed but site is not necessarily suited to housing | |
| 17 | 'Your New Town Hall' SW2 | - preferred use of site includes residential as well as community facilities and employment floorspace - sustainable location with good access to community facilities | - preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size | - compliance with Local Plan housing and quality of built environment policies, in |

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| | | | | |
|----|-----------------------------------|--|--|---|
| | | and public transport - design considerations include respecting the amenity of adjoining residential occupants and the setting of St Matthew's Church | | particular policies H2 and H4. |
| 18 | 286 - 362 Norwood Road SE27 | -preferred use of site is retail led mixed use development including housing - sustainable location with good access to community facilities and public transport | - preferred amount of residential not provided - does not specifically states provision of affordable housing or mixed tenure and size - no specific design considerations mentioned that recognise existing residential environment | - compliance with Local Plan housing and quality of built environment policies, in particular policies H2 and H4. |

*As highlighted above, some of the site allocations specifically mention provision of affordable housing where residential use is proposed for the site, while other site allocations do not. All site allocations will be subject to Local Plan policies. In light of SA recommendations, this point has been addressed and references to affordable housing in site allocations has been removed.

Summary of Policies and Site Allocations

5C6.49 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will have significant positive effects albeit with some element of uncertainty on improving the existing baseline conditions, and ensuring everyone has access to decent, appropriate and affordable housing.

Table 28: Summary assessment of effects of Local Plan for housing

| Assessment of effects of the Local Plan on SA objective 6 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|--|-------|--|---|--|
| Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity. | ++/? | <p>On the whole, and incorporating SA recommendations; it is considered that the Local Plan will generally have significant positive effects on the SA Objective. This is because the Local Plan makes provision for new housing that will be of appropriate housing mix, type and size enabling social inclusion and the ability to remain in a community for a life time if so desired. Housing will be well designed both individually and with other buildings and the surrounding environment and all developments will need to incorporate or provide for affordable housing. It is considered that the housing policies make a significant contribution to positively addressing the key sustainability issues for housing, outlined in Table 3. Deliverability of housing completions (particularly in the short term and more likely in locations outside of Opportunity Areas) is somewhat uncertain given the current economic climate but this is expected to be rectified in future years. Similarly, delivery of necessary infrastructure to support housing and associated population growth is uncertain. Provision of infrastructure or lack of will have significant impact on people's enjoyment of their home.</p> <p>To help meet housing targets and improve local economy, it is considered that residential above ground floor in town centres is appropriate (subject to marketing tests demonstrating no demand for business use).</p> | <p>It is considered that the Local Plan provides the essential planning framework to accommodate housing that is decent, appropriate and affordable. However, there remains uncertainty on the delivery of the extent of housing proposed by the Local Plan, particularly in the short term. This is mainly in response to the current economic climate and depressed state of new house building trends of recent years. Given this, it is considered unlikely that significant amounts of new housing will be available in the short term (except perhaps in Vauxhall Opportunity Area), despite the extent of planning permissions for housing developments already granted. Therefore, access to decent, appropriate and affordable housing is likely to be a medium to long-term achievement; however delivery of new housing remains uncertain.</p> | <p>Permanent, provided affordable housing assigned as socially rented and intermediate housing remains so in perpetuity.</p> |

Recommendations for monitoring likely significant and uncertain effects

5C6.50 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § Number of new dwellings permitted
- § Number of new dwellings completed each year
- § Number of new affordable dwellings completed each year

5C7 LIVEABILITY AND PLACE

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

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

5C7.2 To achieve this objective, plan policies should enhance the quality and quantity of open space and the public realm; reduce the proportion of the public realm where noise precludes conversation or where other environmental factors (e.g. fumes) make it unpleasant to be; promote community engagement; promote interactions between different sectors of the community; promote good governance, promote wellbeing and help to make people feel positive about the area where they live; promote child-friendly buildings; and promote Lambeth as a place that people want to put down roots rather than just pass through.

Relevant policy objectives

National Level

5C7.3 The *NPPF 2012* seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Planning policies should offer a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Further, planning policies should establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.

Regional Level

5C7.4 The 'London's People' chapter of the *London Plan (2011)* contains a raft of policies that all work together to help create a sense of place and community belonging. For example policies addressing equal life chances, health inequalities, communities mixed and balanced by tenure and income, housing affordability, accessibility, shared space principles, inclusive environments and improved public realm.

Baseline conditions and existing issues

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

5C7.6 The total population change – that is, the proportion of people moving in and out of the borough – is often referred to as population churn. Official levels of population churn have been stable at around 22-24% for the last few years; this means that approximately 12% of the population leave each year and are replaced by around 10% new arrivals. In other words, around 88% of the population each year remains the same. In 2008-9, 34,400 people moved into the borough, and 35,700 moved out, a total churn of 70,100. This is 24% of the 2008 population. The population churn gives rise to significant pupil mobility within Lambeth schools. The average pupil mobility is 8.1% in primary schools and 4.5% in secondary schools. These rates of change are typical of inner London (SOB 2011).

5C7.7 Although levels of churn are relatively high, Lambeth is a largely residential borough with many long term residents. Data from the Lambeth residents' survey indicates

that 80% of Lambeth's population has been resident for over two years, and 65% over five years. High population turnover is not an inherently negative phenomenon, nor is it always caused by movement of transient, heavy users of public services. As well as short term international visitors, there are also many young, qualified migrants who work for a short time before returning home (who are often in the UK on two year working holiday visas). For example, one in six of all National Insurance numbers allocated to non-UK residents in Lambeth between 2002 and 2010 was to someone from Australia, New Zealand or South Africa, and a further one in seven was from Poland (SOB 2011).

5C7.8 The Borough is the 14th most deprived in England. This is worse than 2004, when the borough was ranked 23rd in England. This is a result of relative improvements in other boroughs and a decline in Lambeth in four of the seven areas that comprise overall IMD (Indices of Multiple Deprivation): income; health and disability; living environment; and access to housing and barriers to services. The other three areas are employment; education, skills and training; and crime and disorder, all of which remained the same or improved (SOB report 2008).

5C7.9 Many of Lambeth's neighbourhoods are already known and valued for their mixed communities that include both young and old, people with and without disabilities, a variety of income levels and the full range of ethnic and cultural backgrounds. The neighbourhoods of the future need to maintain and improve this mix while providing high quality, well serviced residential environments with a sense of place, in which people and families wish to settle and prosper.

5C7.10 At present, some communities feel that their neighbourhoods lack stability and that not enough households stay long enough to put down roots and contribute positively to community life. Residents in some parts of the borough feel particularly strongly that families are an essential part of a stable community and that the loss of family housing to flat conversions is damaging this (Core Strategy 2011).

Likely evolution without the Plan

5C7.11 The current Core Strategy contains good provisions rejuvenating town centres, providing affordable housing, accessibility and protection of open spaces, all of which contribute to encouraging a sense of place, community identity and belonging. The National and Regional policies provide a good framework for promoting developments enhancing social inclusion, however they lack detail, for example, precise numbers of affordable housing and design characteristics appropriate for Lambeth. In the absence of a new Local Plan, Core Strategy policies could be considered out-of-date with National Planning Policy Framework, and Neighbourhood Plans could be prepared that propose a level or type of development that is consistent with national policy but may not be consistent with the Council's vision for Lambeth, or what the Council has traditionally supported.

Assessment of Policies

5C7.12 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 7 Liveability and Place. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.

5C7.13 The following policies have been screened as having potential for significant effects on this objective:

| | |
|---|--|
| D1 – Delivery and monitoring | EN1 – Open space |
| D2 – Presumption in favour of sustainable development | EN2 – Local food growing and production |
| D3 – Infrastructure | EN5 – Flood risk |
| D4 – Planning obligations | EN7 – Sustainable waste management |
| D5 - Enforcement | Q1 – Access for disabled people |
| H1 – Maximising housing delivery | Q2 – Amenity |
| H2 – Delivering affordable housing | Q3 – Community safety / crime |
| H3 – Safeguarding existing housing | Q4 – Public art |
| H4 – Housing mix in new developments | Q5 – Local distinctiveness |
| H5 – Housing standards | Q6 – Urban design / public realm |
| H6 – House conversions | Q7 – Urban design / new development |
| H7 – Student housing | Q8 – Design quality / construction detailing |
| H8 – Housing to meet specific community needs | Q9 – Landscaping |
| H10 – Gypsy and Traveller needs | Q10 - Trees |
| ED4 – Work-live development | Q11 – Building alternations and extensions |
| ED6 – Town centres | Q12 – Refuse / recycling storage |
| ED7 – Evening economy and food and drink uses | Q13 – Development in gardens |
| ED8 – Public Houses | Q15 – Boundary treatments |
| ED9 – A2 uses | Q16 – Shop fronts and signage |
| ED10 – Local centres and dispersed local shops | Q17 – Advertisement panels and hoardings |
| ED11 – Visitor attractions, leisure, arts and culture uses | Q18 – Historic environment strategy |
| ED12 – Hotels and other visitor accommodation | Q19 – Westminster world heritage site |
| ED13 – Markets | Q20 – Statutory listed buildings |
| S1 – Safeguarding existing community facilities | Q21 – Registered parks and gardens |
| S2 – New or improved community facilities | Q22 – Conservation Areas |
| S3 - Schools | Q23 – Undesignated heritage assets |
| T1 – Sustainable travel | Q24 – River Thames |
| T2 – Walking | Q25 - Views |
| T3 – Cycling | Q26 – Tall buildings |
| T4 – Public transport infrastructure | PN1 – Waterloo |
| T5 – River transport | PN2 – Vauxhall |
| T6 – Assessing impacts of development on transport capacity | PN3 – Brixton |
| T10 – Telecommunications | PN4 – Streatham |
| | PN5 – Clapham |
| | PN6 – Stockwell |
| | PN7 – West Norwood |
| | PN8 – Kennington / Oval |
| | PN9 - Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and Monitoring policies D1 – D5

5C7.14 Overall it is considered that policies, in particular D1, D3 and D4, will result in significant positive effects on SA Objective 7. This is because the policies seek to ensure partners are involved in delivering sustainable development, that local distinctiveness is enhanced, infrastructure is in place to support growth (although actual delivery can be uncertain) and planning obligations are used for local improvements for example infrastructure, public realm improvements, and highways and traffic works. However, policy D5 states that enforcement will be prioritised according to the harm to amenity caused and resources available, and that investigations will be carried out proportionately in relation to the breach of planning control identified. It is arguable whether this promotes good governance, as identified in the sustainability framework as an appraisal prompt question for SA Objective 7. There is some concern that cumulative impacts may not always be avoided with this proposed policy approach.

Housing policies

5C7.15 It is considered that the housing policies should result in significant positive effects on SA Objective 7. New housing, including estate renewal and regeneration schemes, affordable housing, mix of dwelling sizes (including protection of family sized homes

from conversion), as well as outdoor amenity spaces provided with housing, dwellings designed and built to lifetime home standards (policies H1 – H6), and provision of children’s play space in residential developments all work to promote long-term social cohesion, sense of place, and help encourage people to put down roots in Lambeth.

5C7.16 The Local Plan also makes provision of housing to meet specified community needs, across a range of tenures. Policy H8 should result in more sustainable, mixed use social environments that promote social cohesion and where residents of this accommodation type can feel a sense of place to the local area. Previous SA recommendation ensuring any loss of housing specific to community needs is re-provided on site or elsewhere within the Borough has been taken on board and strengthens to policy in terms of achieving SA Objective 7. Continued safeguarding of the existing gypsy and traveller site should also result in sense of place feelings for gypsies and travellers, coupled with the Council’s commitment to identify a new site for additional facilities.

Economic Development and Town Centres policies ED4, ED6 – ED13

5C7.17 Overall it is considered that the economic development and town centre policies should result in positive effects on SA Objective 7. In response to previous SA recommendations, the Plan makes provision for residential use in appropriate parts of town centres. Allowing residential above ground floor in town centres helps provide sustainable, liveable mixed use physical and social environments that promote long-term sustainable living, sense of place and social cohesion. Policy ED6 seeking to support the vitality and viability of town centres, for example protecting markets and areas of specialist shops, local shops and other local services will help promote interactions between sectors of the community and contribute to feelings of sense of place and social cohesion. The policy also contains design guidance in addition to the design policies in Section 10 of the Local Plan which further assists in producing well designed and liveable town centres.

5C7.18 More positive effects would likely result in terms of SA Objective 7 if residential uses were provided for above ground floor of town centres rather than just shops (emphasis added).

5C7.19 Previous SA recommendations for policy ED7 Evening economy and food and drink uses have been taken on board and more effectively seek to promote a more pleasant environment that people feel positive about in terms of community safety and amenity of neighbouring residential areas or sensitive uses. The policy also seeks to avoid stopping up of public highway with outdoor seating (rather than prohibiting it), thereby contributing to achieving SA Objective 7. It is noted that this management of public highway only applies for food and drink uses even though sandwich boards associated with A1 uses can result in the same or similar effects for people using pavements. The Plan does not contain policy on this, but it is expected this is managed by the Council through public highway permits. Policy ED8 on Public Houses is new to the Local Plan and will likely provide significant positive effects in terms of SA Objective 7. Pubs often play a valuable role in local community life, providing a hub for social interaction, and contributing to the identity and character of an area. If a public house is considered to have townscape or heritage value, the Council will seek to retain the building and special features, also contributing positively towards the attainment of SA Objective 7. ,

5C7.20 Previous SA work highlighted concern with a blanket, across- borough approach to limiting food and drink uses to no more than 2 in 5 consecutive premises outside primary shopping areas and in local centres. In response to this (and other

representations on the Local Plan) management of food and drink uses is now provided in each places and neighbourhoods policy, specific to the centre itself. This area specific approach will likely lead to more positive outcomes in terms of SA Objective 7 than the previous blanket approach as food and drink uses (includes cafes, pubs, restaurants) do provide opportunities for community engagement, social cohesion, and interactions, but equally these should be managed in an area specific way.

- 5C7.21 Overall it is considered that policy ED9 will result in positive effects on SA Objective 7. It seeks to control the number of A2 use premises in town centres, particularly betting shops, pawn shops and money shops which can lead to a negative impact on the vitality and viability of town centres, and/or increased perception of crime or fear of crime, including anti-social behaviour. It is considered that the policy contributes to making people feel more positive about the area they live, and a sense of pride and place for their local town centre. Previous SA recommendation on this policy has been taken on board to make clear that any of clauses (i) – (iii) can be reason for planning permission refusal.
- 5C7.22 Policies ED10 – ED13 are also likely to result in positive effects on liveability and place. Policy 10 recognises the role local centres play for residents and seeks to ensure key local retail uses are retained at a very local scale to meet day to day needs of communities, particularly more vulnerable groups with reduced accessibility and/or mobility. Any loss of local centre premises must be justified through stringent marketing requirements. Policy ED11 seeks to safeguard and improve leisure, recreation, arts and cultural facilities in the Borough, particularly in CAZ, Vauxhall and Waterloo Opportunity Areas and town centres, all of which provide good social environments and promote community engagement and interaction. Improvements to public realm associated with this use may be sought through planning obligations, further seeking to meet targets of SA Objective 7. Policy ED13 makes provision for new markets provided that existing shopping facilities or markets located within town centres are not harmed and local amenity and traffic is not adversely affected. The policy protects existing indoor and street markets which in some areas of the Borough, such as Brixton, will likely result in significant positive effects on liveability and place and the targets set out in Table 4.
- Social Infrastructure policies S1, S2 and S3**
- 5C7.23 Policies S1, S2 and S3 will likely result in significant positive effects on liveability and place. Policy S1 offers provision for safeguarding existing community premises, promotes the most effective use of community premises for different and changing priorities and needs, and supports change of use between D1 and D2 use classes to provide flexible stock of land and premises. Policy S2 supports proposals for new community premises, subject to criteria including the need for buildings and facilities to be designed to be flexible, adaptable and sited to maximise shared community use of premises. The policy also makes provision for residential accommodation to be used for a nursery or childcare use in exceptional circumstances subject to specified criteria. Policy S3 on schools makes provision for the shared use of schools for wider community use. School places are an important part of liveability and providing a place where people want to put down roots rather than just pass through. Provision of social infrastructure is considered crucial in producing successful social environments and improved social cohesion.
- Transport policies T1 – T6 and T10**
- 5C7.24 Appropriate transport infrastructure, particularly public transport and active travel networks given the low car ownership levels in Lambeth, are critical components in designing liveable places and communities. Sustainable patterns of development that

minimise the need to travel and reduce dependence on the private car are supported in the Borough. Overall it is considered that policies T1 – T6 will likely result in significant positive effects on SA Objective 7. These policies seek to increase walking and cycling journeys and improve their infrastructure, improve public transport infrastructure including accessibility, capacity, and connectivity, promote effective use of the River Thames and manage transport impacts which all (individually and cumulatively) work towards providing more sustainable living options, and reduce the proportion of public realm where environmental factors such as car fumes make it unpleasant to be and enhance quality of public realm.

5C7.25 Policy T10 on Telecommunications ensures that the siting, height and design of equipment is minimised and does not cause unacceptable harm to the character or appearance of the area and is not visually intrusive in street scene or creates unacceptable clutter. Previous SA recommendation has been taken on board so that any noise or vibration arising from telecommunication operation is mitigated. This amendment to policy seeks to provide a more liveable physical environment for adjacent properties.

Environment and Green Infrastructure policies EN1, EN2, EN5, EN7

5C7.26 Overall, the environment policies will likely result in positive effects on SA Objective 7. Policy EN2 has been improved in response to previous SA recommendation so there is provision for food growing areas outside of residential only land use developments. Local food growing initiatives have substantial potential to bring different communities together, promote social engagement, interaction and learning, provide opportunities for more sustainable living and help people for more positive of the area they live.

Quality of the Built Environment policies Q1 – Q25

5C7.27 Generally, all policies (Q1 – Q25) seek to provide a well designed, liveable, physical and social environment that will contribute to sense of place, and are therefore likely to result in positive effects. Previous SA recommendations (many already mentioned in this report but also including preference for dual aspect residential units (policy H5)) have been incorporated which provide positive effects for achieving SA Objective 7.

5C7.28 Policy Q3 on community safety and particularly supporting text paragraph 10.6 outlines design responses which will not be considered appropriate and positive design responses that will be encouraged. These effectively contribute to creating an environment conducive to achieving liveability and sense of place in Lambeth.

5C7.29 Policy Q4 addresses public art, which has potential to create significant positive effects on liveability and place. Previous SA recommendations have been incorporated to maximise positive effects for liveability and place objectives, for example decommissioned public art is expected to be relocated to a public place within the borough; and all large scale redevelopment schemes are expected to include new public art.

5C7.30 Policies Q5 to Q8 should result in positive effects for design of developments and surrounding environments. Previous SA recommendations to policies Q6, Q7, Q8 and Q11 have been incorporated to improve their sustainability and better manage effects (for example in relation to plant equipment and infrastructure cabinets and design of vehicular access).

5C7.31 Landscaping and trees contribute to positive feelings of sense of place and pride for people and often provide an environment conducive to social interactions. Policy Q9

landscaping has been significantly improved so that opportunities for greening are maximised such as through tree planting and soft landscaping and hard landscaping features provide sustainable drainage. These amendments to policy are in response to previous SA work which highlighted the draft Local Plan policy emphasis on retention rather than new provision (i.e. net increase in trees and greenery) and encouragement of hard landscaping but silent on use of permeable surfaces. Policy Q10 has also been improved in light of SA comments whereby planting of additional trees in new developments should be included. These changes to policy seek to maximise positive effects in terms of SA Objective 7, but also other objectives such as 2 (health), 10 (biodiversity), 11 (climate change), 12 (water), and 14 (air quality).

- 5C7.32 Previous SA work recommended that the updated Supplementary Planning Document proposed for Residential Alterations and Extensions includes detailed guidance, in particular with regards to clause (h)(i) of policy Q12, as the determination of 'sufficient' side space that maintains the 'value' of the gap is quite subjective, and if interpreted or implemented inappropriately will likely result in adverse impacts, particularly on the physical and built environment. This recommendation has been accepted by the Council.
- 5C 7.33 Policy Q15 seeks to limit development in gardens and backland sites and it is considered this policy effectively maintains liveable physical and social environment, protects amenity, and helps people feel positive about where they live. Car parking in front gardens is allowable for disabled people which means that all dwellings built to Lifetime Homes standards will likely have car parking and this could be provided for in front gardens.
- 5C7.34 Policies Q18 to Q23 seek to preserve or enhance heritage assets in the Borough. Heritage contributes to feelings of sense of place and belonging, liveability and place but also may place development restrictions on buildings which may adversely impact on owners / occupiers. However it is generally considered that buyers into such areas / buildings are likely drawn by the heritage values. It is considered that these policies will likely result in positive effects with respect to SA Objective 7.
- 5C7.35 Providing a continuous river walkway supports SA Objective 7 and enhancing the quality and quantity of open space and public realm. Policies Q25 (views) and Q26 (tall and large buildings) should also result in positive impacts for liveability and place. However, it is unclear how a tall building will be defined and where some places and neighbourhoods policies set out expected heights in some specific local areas; not all do. The previous draft Local Plan contained a definition; however SA work considered this definition needed revisiting for less ambiguity and inconsistency with consented schemes along the River Thames. Nonetheless, policies Q2, Q6 and Q7 should manage any adverse effect on amenity that result from tall buildings such as overlooking, shadowing, privacy and scale and bulk relative to surrounding area.

SA Recommendation: There is some uncertainty over when the policy will be triggered/how a tall building is defined.

Council response: Accepted – in line with London Plan supporting text, para 10.113 has been changed to clarify how a tall or large building will be determined.

Places and Neighbourhoods policies PN1 – PN9

- 5C7.36 Policy PN1 on Waterloo will likely result in significant positive effects on liveability and place. It promotes social interactions between different sectors of community, and community engagement through its role for culture and arts, as well as tourist, leisure and entertainment facilities. Mixed uses developments, including affordable housing, coupled with measures such as safeguarding Lower Marsh/The Cut for its local needs services and specialist retailing are encouraged which further promotes social environments conducive to supporting social cohesion and sense of place. The area has good transport links, and the policy supports improvements to transport capacity and accessibility, as well as improved healthcare facilities, all of which support long-term sustainable living. Part of Hungerford Carpark is proposed to be redeveloped into open space as an extension to the Jubilee gardens. This will deliver enhanced quality and quantity of open space provision in this area of the Borough. The remainder of the carpark is to be used for arts and cultural uses. The loss of the car park is considered very positive for the area in terms of liveability and place, as well as other sustainability benefits such as improved air quality, and visual effects.
- 5C7.37 Policy PN2 on Vauxhall will also likely result in a mix of significant positive effects and uncertain or possibly negative effects (regarding tall buildings and dependent on the degree adverse effects are mitigated through other design policies) in terms of SA Objective 7. A new district centre will be created that will include mixed use development for the range of town centre uses. The policy also seeks to respect local distinctiveness of existing neighbourhood destinations, and consolidate and expand cultural and evening economy uses between places of interest. Public realm improvements are proposed, particularly in terms of public transport infrastructure, walking and cycling, as well as removal of the gyratory which should result in significant positive impacts on the physical environment of the area. The policy states that heights of up to 150m will be acceptable in and around Vauxhall Cross and along the Embankment up to 80 metres. It is noted that the heights of 150m and 80 are derived from key principles outlined in the Vauxhall Opportunity Area Framework and some schemes of these heights have already been consented. There are amenity concerns with heights of this scale, including overshadowing, restricted views of the Thames and wind tunnel effects, as well as visual effects that could be perceived by some as 'skyscrapers'. However, effective implementation of policies Q26 and amenity and urban design policies Q2, 6 and Q7 should seek to manage or mitigate such adverse impacts on the environment. 150m is the highest height mentioned in the Local Plan and in the absence of any other definition for tall building, might be deemed to provide an indication to developers that buildings 150m are considered to be a tall building (or at least 80-90m as this figure is also mentioned). Adverse effects on surrounding communities resulting from tall buildings will need to be mitigated. Delivery of necessary infrastructure prior to occupation will be an important determinant of achieving a district centre that is liveable, promotes social cohesion and sense of place, and delivery of such infrastructure (for example schools and health provision) is currently uncertain, as is delivery of the northern line extension prior to occupations of surrounding developments.
- 5C7.38 Policy PN3 for Brixton should result in significant positive effects for SA Objective 7. It seeks to safeguard and promote the multicultural and diverse town centre through sensitive regeneration and details specific levels of A1 retail and A3/4/5 uses which are considered to be effective for achieving SA Objective 7. Local heritage and historic built environment and different character areas will be respected, public spaces improved and mixed used developments including residential, employment, cultural industries, leisure and entertainment, as well as new school places.
- 5C7.39 Policy PN4 for Streatham will also likely result significant positive effects through

improved accessibility and use of public transport, walking and cycling with measures to reduce impact and dominance of road traffic. Improved vitality, viability and local distinctiveness of the four distinct hubs of Streatham will be supported and specific levels of A1 retail and A3/4/5 uses are sought. Landmark buildings providing destinations for people of the wider catchment, enhancement of community facilities, mixed use developments including housing, and new markets in Streatham Central and Streatham Village will likely promote community engagement and result in people feeling positive about where they live.

- 5C7.40 Policy PN5 for Clapham seeks to provide a district centre that reinforces its distinct character and historic environment and encourage provision for cultural, creative, visual and performing arts, street markets and other forms of community innovation while managing food and drink uses and impact of evening economy (compliance with policy ED7). The policy will likely result in improved liveability and feelings of sense of place.
- 5C7.41 Improvements to housing estates and connections between housing estates as well as improved traffic and environmental conditions for pedestrians and cyclists (in response to previous SA recommendation) will likely result in enhanced sense of place and improved community cohesion for Stockwell, as provided for in policy PN6.
- 5C7.42 It is considered that liveable, mixed use physical and social environments should result in the West Norwood district centre as a result of policy PN7. Shopping floor-space, education and other community facilities including healthcare, commercial uses and housing are proposed for the centre. Regeneration and improvement of existing housing estates will be supported, as will development to meet education need in the area. Overall it is considered that positive effects should result from policy PN7.
- 5C7.43 Policy PN8 for Kennington/Oval seeks to improve the relationship of the stadium with the adjoining area, particularly improved linkages and public realm. The policy also seeks to improve the quality and extent of shopping and other town centre uses, including reuse of the Oval House Theatre, housing and employment. It is considered that the policy should result in significant positive effects on the current baseline of the environment.
- 5C7.44 Policy PN9 for Herne Hill also seeks to enhance the quality of the public realm, particularly between the station and adjoining areas. The historic character will be protected and enhanced, also contributing to a sense of place.
- 5C7.45 Loughborough Junction policy PN10 has been co-produced with the LJAG and seeks a clear identity and sense of place for the local centre. Public realm improvements and well designed schemes will be supported to engender a sense of place in Loughborough Junction. Improved access, better use of underused spaces and places and improved public safety measures are proposed. The policy seeks to provide all necessary services and access to employment within close walking distance of every home which demonstrates a desire to achieve sustainable lifestyles and improved social cohesion for the area. The seven bridges project will significantly improve the railway bridges which are a key feature of the area resulting in a real sense of identity and pride for the area.
- 5C7.46 Policy PN11 for Upper Norwood also supports opportunities for physical improvements that will enhance and improve the centres character and improve conditions for traffic and pedestrians in the area as well as transport links to other parts of London. It is recommended that cyclists are considered in environmental

improvements and therefore also mentioned in the policy. This will likely result in more positive effects for SA Objective 7, including promoting sustainable lifestyles.

SA Recommendation: More positive effects will result from policy PN11 if provision of cyclists and their needs are considered as part of improved environmental conditions.

Council response: Agreed – this change has been made to policy PN11

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C7.47 All sites in Table 30 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 7.

Table 29: Significance criteria for SA Objective 7: Liveability and Place

| Positive | Negative |
|---|---|
| <ul style="list-style-type: none"> • Allocation contributes positively to open space provision and the quality of the public realm • Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion • Allocation provides additional shops and services in town and other centres • Housing or mixed use site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre. | <ul style="list-style-type: none"> • *Site is protected open space, including MOL or Green Belt • Site would reduce open space provision or impact adversely on the public realm. • Allocation likely to increase private car use (and worsen modal shift). • Out of 'centre' site likely to compete with shops and services in town and other centres |

* Indicates high level constraint

TABLE 30: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 7: LIVEABILITY AND PLACE

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|---|---|---|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | <ul style="list-style-type: none"> - Housing site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre - allocation provides healthcare facilities as preferred use - allocation contributes positively to quality of public realm, respected conservation area and registered park | | |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | <ul style="list-style-type: none"> - education use is the preferred use which promotes improved social cohesion locally (local children can attend local school – helps people ‘put down roots’) - allocation ensures due consideration of neighbouring residents in terms of amenity such as noise, privacy | <ul style="list-style-type: none"> - potential for increased vehicle movements associated with school drop-off / pick up which may impact adversely on public realm | <ul style="list-style-type: none"> - site has good public transport accessibility, particularly from Acre Lane - compliance with other Local Plan policies, particularly transport policies |
| 3 | Vale Street Depot, Vale Street SE27 | <ul style="list-style-type: none"> - preferred use is education or housing (see above if used for education) - allocation ensures due consideration of neighbouring residents in terms of amenity such as noise, privacy - allocation respects adjoining conservation area | <ul style="list-style-type: none"> - if used for education: potential for increased vehicle movements associated with school drop-off / pick up which may impact adversely on public realm - potential for increased private vehicle use given public transport accessibility is classified as very poor and site proposed to retain reuse and recycling centre | <ul style="list-style-type: none"> - compliance with other Local Plan policies, particularly transport policies |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> - preferred use is education with housing potential – promotes better sense of place for locals - if used for education: potential for increased vehicle movements associated with school drop-off / pick up which may impact adversely on public realm - Very good public transport accessibility – within 20mins door to door to town or other centre | | <ul style="list-style-type: none"> - compliance with other Local Plan policies, particularly transport policies |
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> - Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion - Allocation provides additional shops and services - Housing or mixed use site within 20 minutes of door-to-door journey time by public | | |

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| | | | | |
|----|--|---|---|--|
| | | <p>transport, walk, or cycle modes to town or other centre</p> <ul style="list-style-type: none"> - Allocation contributes positively to open space provision and the quality of the public realm | | |
| 6 | Shell Centre, 2-8 York Road SE1 | <ul style="list-style-type: none"> - Mixed use development, including community, cultural, sport facilities that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion - Allocation provides additional shops and services - site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre - Allocation contributes positively to open space provision and the quality of the public realm | | |
| 7 | Waterloo Station, Waterloo Road SE1 | <ul style="list-style-type: none"> - Allocation contributes positively to open space provision and the quality of the public realm - preferred use is railway terminal and transport interchange with retail and office uses - Allocation provides additional shops and services - mixed use site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre | | |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | <ul style="list-style-type: none"> - Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion - site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre - Allocation contributes positively to open space provision and the quality of the public realm | | |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | <ul style="list-style-type: none"> - Allocation contributes positively to open space provision and the quality of the public realm - mixed use site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre - allocation provides additional shops and services (active frontage) in CAZ | | |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | <ul style="list-style-type: none"> - preferred use mix of uses including residential, employment and retention of operation fire station - mixed and balanced community with acceptable mix is a key development consideration for the site - site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre - Allocation contributes positively to open space provision (new internal publically accessible square) and the quality of the public realm | <ul style="list-style-type: none"> - noise and disturbance issues may arise with the retention of an operational fire station along with residential | <ul style="list-style-type: none"> - Compliance with other Local Plan policies (in particular those addressing amenity) |
| 11 | Keybridge House, 80 South Lambeth Road, | <ul style="list-style-type: none"> - Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion | <ul style="list-style-type: none"> - noise, pollution and vibration associated with railway viaduct may impact on liveability unless | <ul style="list-style-type: none"> - Compliance with other Local Plan policies (in |

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| | | | | |
|----|---|--|--|---|
| | 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | <ul style="list-style-type: none"> - Allocation provides additional shops and services - provision for new primary school also contributes to social cohesion - site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre - Allocation contributes positively to open space provision and the quality of the public realm | appropriately designed and mitigated against | particular those addressing amenity) |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | <ul style="list-style-type: none"> - Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion (public art provision included in allocation) - site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre - Allocation provides additional shops and services - Allocation contributes positively to open space provision and the quality of the public realm | - noise, pollution and vibration associated with railway viaduct may impact on liveability unless appropriately designed and mitigated against | - Compliance with other Local Plan policies (in particular those addressing amenity |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | <ul style="list-style-type: none"> - Mixed use development that promotes walking and cycling and sense of place, promoting social interaction and improved cohesion - Allocation provides additional shops and services - site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre - Allocation contributes positively to open space provision and the quality of the public realm | | |
| 14 | Somerleyton Road SW9 | <ul style="list-style-type: none"> - site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre - mixed use development site, promoting social cohesion and interaction - allocation provides additional services - Allocation contributes positively to open space provision and the quality of the public realm | | |
| 15 | Popes Road SW9 | <ul style="list-style-type: none"> - mixed use development including retail, commercial, community, leisure, residential and town centre car and cycling parking - Allocation contributes positively to open space provision and the quality of the public realm - allocation re-provides adequate market facilities which contributes to social cohesion and interaction - site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre - allocation provides additional shops and services | - provision of car parking promotes private vehicles use | - compliance with other Local Plan policies, particularly transport |
| 16 | Brixton Central (between the viaducts) SW9 | <ul style="list-style-type: none"> - mixed use retail, workspace, food and drink, community leisure and recreation uses, as well as creative and cultural industries hub and market support centre and facilities will likely result in social interaction and cohesion - allocation provides additional shops and services | | |

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| | | - Allocation contributes positively to open space provision and the quality of the public realm (including improvement to Brixton Station) | | |
| 17 | 'Your New Town Hall' SW2 | <ul style="list-style-type: none"> - redevelopment to provide community facilities, retail, residential and employment floorspace as well as civic uses will result in social cohesion, interaction and improved liveability - allocation provides additional shops and services - Allocation contributes positively to open space provision and the quality of the public realm - site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre | | |
| 18 | 286 - 362 Norwood Road SE27 | <ul style="list-style-type: none"> - mixed use development including supermarket, housing, community uses will result in social interactions and cohesion - allocation provides additional shops and services - Allocation contributes positively to open space provision and the quality of the public realm - site within 20 minutes of door-to-door journey time by public transport, walk, or cycle modes to town or other centre | | |

Summary of Local Plan policies and site allocations

5C7.48 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan policies and site allocations will have a significant positive effect albeit with some element of uncertainty on recognising the existing baseline and in promoting social cohesion, sustainable lifestyles and sense of place.

Table 31: Summary of assessment of effects of Local Plan on liveability and place

| Assessment of effects of the Local Plan on SA objective 7 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|---|-------|--|---|--|
| To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place. | ++/? | <p>Generally, it is considered that the Local Plan contains good provisions that work well together to encourage a sense of place, community identity and belonging. Not one policy will solely achieve this; but each contributes an aspect that will result in significant cumulative positive effects in creating a Borough where communities feel they belong, where they identify with and wish to put down roots and where they feel a sense of place.</p> <p>Mixed-use developments, including housing are proposed for Opportunity Areas, major centres and most site allocations where public transport accessibility is generally good. These areas will likely result in increased densities and population. Necessary infrastructure to support this growth will need to be in place before occupation of developments in order to effectively achieve SA Objective 7 in a timely manner. There is uncertainty whether such infrastructure will be delivered in time (see Infrastructure Schedule Annex 2 of Local Plan), particularly in relation to Vauxhall. The Plan seeks to ensure services and facilities are accessible and there continues to be opportunities for local employment.</p> <p>Public realm improvements are proposed for all town centres including new open space provision where possible and improved connectivity and accessibility by active travel and public transport is promoted through transport policies.</p> | <p>It is considered that as areas of the Borough are regenerated, and buildings are redeveloped it is likely that actions will be taken to help improve the sense of place and community identity and belonging. Therefore small scale achievements (e.g. redevelopment of a town centre park or square) and small scale new housing developments may be made in the short term. Commencement of development of Vauxhall Opportunity Area is likely in the short term and will continue during the whole plan period.</p> <p>In the medium to long term, it is likely that house building rates will increase (particularly outside of Opportunity Areas) and town centres will be redeveloped in a manner that results in increased sense of place, identity and belonging. Similarly, as population grows due to new housing building, community facilities will need to be provided to reflect demand.</p> <p>Major transport developments are unlikely to be evident until the medium to long-term.</p> | Permanent and ongoing in terms of recognising and providing for specific needs of the community as population increases. |

Recommendations for monitoring likely significant and uncertain effects

5C7.49 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § Diversity of resident ethnicity
- § Resident surveys on satisfaction parks and open spaces
- § Resident surveys on perception of crime and level of safety in public
- § Level of population churn
- § Annual update of Infrastructure Schedule

5C8. BUILT AND HISTORIC ENVIRONMENT

5C8.1 This section of the SA relates to the sustainability performance of the Local Plan against:

SA Objective 8: Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets.

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

Relevant Policy Objectives

National Level

5C8.3 Paragraphs 126 – 141 of the National Planning Policy Framework 2012 relate to Conserving and Enhancing the Historic Environment. It states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In terms of design, paragraphs 56 – 68 provides guidance. The Government attaches great importance to the design of the built environment.

5C8.4 *English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)*

The aim of this document is to set out a logical approach to making decisions and offering guidance about all aspects of the historic environment, and for reconciling its protection with the economic and social needs and aspirations of the people who live in it. The document contains conservation principles, policies and guidance that make a contribution to addressing the challenges of modernising heritage protection by proposing an integrated approach to making decisions, based on a common process.

Regional Level

5C8.5 Chapter 7 of the *London Plan 2011*, London's Living Places and Spaces, contains a raft of design, character and architecture related policies. For example, architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. Areas that are appropriate, sensitive or inappropriate for tall and large buildings should be identified in Local Development Frameworks and meet criteria outlined in the London Plan.

Baseline conditions and existing issues

5C8.6 Lambeth has approximately 2,500 listed buildings. The vast majority of these are nineteenth century residential dwellings reflecting the historical development of the borough. Typically two or three structures are added to the statutory list each year. A local list of historically significant buildings (not on the national list) is being prepared.

5C8.7 There are 62 conservation areas in Lambeth covering approximately 30 per cent of the borough. Eighteen conservation areas have up-to-date character appraisals. The first area was designated in 1969 and the most recent in 2009. These are also mostly residential in character, with the notable exceptions of the South Bank, characterised by post-war cultural and civic buildings, and West Norwood with its nineteenth century cemetery and

many fine monuments. The borough also has seventeen Archaeological Priority Zones and eight historic Registered Parks and Gardens (of which two are private), and has protected strategic views in the north of the borough of St Paul's Cathedral and the Palace of Westminster (a World Heritage site).

- 5C8.8 In 2012 there were 40 buildings on the 'Heritage at Risk Register' – a net increase on the previous year, but this may be attributable to a more thorough inspection of many of the tombs and monuments in the borough and therefore a better understanding of the condition of these.

Likely future evolution without the Plan

- 5C8.9 The council will need to continue to work to reduce the number of buildings and structures on the 'at Risk' register. Without the new Local Plan, the NPPF deems current saved UDP and Core Strategy policies to be out-of-date. Applicable planning policies would be those contained within the London Plan and NPPF, both of which would not provide for the local character and context of Lambeth.

Assessment of Policies

- 5C8.10 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 8 Built and Historic Environment. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.

- 5C8.11 The following policies have been screened as having potential for significant effects on this objective:

| | |
|---|---------------------------------------|
| D1 – Delivery and monitoring | Q18 – Historic environment strategy |
| D2 – Presumption in favour of sustainable development | Q19 – Westminster world heritage site |
| D3 – Infrastructure | Q20 – Statutory listed buildings |
| D4 – Planning obligations | Q21 – Registered parks and gardens |
| ED2 – Business uses outside KIBAs | Q22 – Conservation Areas |
| ED6 – Town centres | Q23 – Undesignated heritage assets |
| ED7 – Evening economy and food and drink uses | Q24 – River Thames |
| ED8 – Public Houses | Q2 5- Views |
| ED11 – Visitor attractions, leisure, arts and culture | Q26 – Tall buildings |
| ED13 – Markets | PN1 – Waterloo |
| T2 – Walking | PN2 – Vauxhall |
| T3 - Cycling | PN3 – Brixton |
| T5 – River transport | PN4 – Streatham |
| T10 – Telecommunications | PN5 – Clapham |
| EN1 – Open space | PN6 – Stockwell |
| EN2 – Local food growing and production | PN7 – West Norwood |
| Q2 – Amenity | PN8 – Kennington / Oval |
| Q3 – Community safety / crime | PN9 - Herne Hill |
| Q4 – Public art | PN 10 – Loughborough Junction |
| Q5 – Local distinctiveness | PN11 – Upper Norwood |
| Q6 – Urban design / public realm | |
| Q7 – Urban design / new development | |
| Q8 – Design quality / construction detailing | |
| Q9 – Landscaping | |
| Q10 - Trees | |
| Q11 – Building alternations and extensions | |
| Q12 – Refuse / recycling storage | |
| Q14 – Development in gardens | |
| Q15 – Boundary treatments | |
| Q16– Shop fronts and signage | |
| Q17 – Advertisement panels and hoardings | |

Delivery and Monitoring policies D1 – D4

5C8.12 Overall it is considered that policies, in particular policies D1, D3 and D4, will result in significant positive effects on SA Objective 8. This is because the policies seek to ensure partners are involved in delivering sustainable development, that local distinctiveness is enhanced, infrastructure is in place to support growth and planning obligations are used for local improvements for example infrastructure, public realm improvements, and highways and traffic works. However achievement of SA Objective 8 and significant positive effects is dependent on delivery of necessary infrastructure in place prior to occupied new development for example the northern line extension to Nine Elms, and increased school places and health provision, particularly in new district centre of Vauxhall.

Economic development and town centre policies ED2, ED6, ED8, ED11, ED13

5C8.13 It is considered that the economic development and town centre policies will result in significant positive effects on SA Objective 8, in particular on conserving and enhancing the townscape/cityscape character and its contribution to local distinctiveness. Policy ED2 allows the loss of employment generating floorspace in very limiting circumstances, one of which is the restoration to its original use of a listed building or a building of significant architectural merit. Development in town centres will need to avoid blank walls and facades, provide shop windows, be designed to add to the physical attractiveness of the area and provide for active frontages at ground floor level, all of which conserve and enhance townscape / cityscape character. Major redevelopment proposals will also need to re-provide small shop premises on affordable terms, which will contribute to maintaining cultural value and its contribution to local distinctiveness of townscapes in the retail offer they provide. Use of pavements for food and drink uses can positively contribute to townscape / cityscape character, and policy ED7 ensures the width of the footway is adequate for this use without obstructing pedestrian flow or result in hazard for users. Policy ED8 seeks to protect public houses for their economic and social roles, but also seek to retain these buildings where appropriate for their architectural / townscape character / heritage and cultural merit too.

5C8.14 Policy ED11 should result in significant positive effects on SA Objective 8. It seeks to safeguard visitor attractions, leisure, arts and culture uses and lends itself to support possibilities for cultural events / activities, contributing to enjoyment of cultural and historical sites. The policy enhances townscape/cityscape character, particularly for its cultural value. The markets policy (ED13) has been improved in response to previous SA recommendation and now more positively contributes to enhancing cultural diversity and value in the Borough by protecting existing markets and supporting new market proposals. It is considered that existing markets in the Borough contribute valuably to townscape/cityscape characters, cultural diversity, cultural value and social cohesion. Markets may also have a (undesignated) historical value to people.

Transport policies T2, T3, T5, T7, T10

5C8.15 Policies T2 on Walking and T3 of Cycling seek to provide physical environments (i.e. walking and cycling routes) conducive for active travel and therefore contribute to the sustainability and quality of the built environment. Existing and new piers support use of the River Thames for transport which contributes to a sustainable built environment; however care must be taken to ensure the number of new piers does not result in adverse visual effects on the river setting itself. The Council response to this is that design policies elsewhere in the Plan address this concern.

5C8.16 Policy T7 on parking seeks to restrict car parking in developments, and promotes car free and low car developments which will help to improve attractiveness, character and sustainability of the built environment. While not stated in policy T7; policy Q7 on design of new developments states that vehicular access and parking need be visually attractive.

Policy T10 supports telecommunications that do not cause unacceptable harm to the character and appearance of an area or building.

Environment policies EN1, EN2, EN4

- 5C8.17 Policies EN1 and EN2 should result in significant positive effects on SA Objective 8, as policy EN1 seeks to protect open spaces and increase provision, and policy EN2 provides for food growing spaces including temporary use of vacant or derelict land or buildings. Policy EN4 is on sustainable design and construction and as a result of previous SA recommendations the policy now seeks much more ambitious sustainability standards, including CEEQUAL (Civil Engineering Environmental Quality Assessment) excellent rating for infrastructure, public realm and open space projects. Improved local air quality and reductions in CO₂ emissions will likely have a positive impact on the existing historic environment and townscape of the Borough.

Quality of Built Environment policies Q2 – Q26

- 5C8.18 Overall, it is considered that the above policies should result in significant positive effects on the built and historic environment. Many recommendations from previous SA work have been incorporated for a more robust policy approach to improve quality, character and sustainability of the built environment. Policies emphasise the need for well designed buildings with use of quality materials where local distinctiveness is sustained and reinforced. This will include both local character and reflecting the cultural diversity of the Borough through appropriate architecture.
- 5C8.19 Refuse/recycling storage and cycle storage (policies Q13 and Q14) areas are expected to be fully integrated into the design of development from the outset, helping to achieve a quality built environment that is sustainable and previous SA recommendation has been taken on board so that cycle storage facilities are provided in non-residential developments.
- 5C8.20 Policies Q15 to Q17 should result in significant positive effects on the built environment. Policies Q18 to Q23 should result in significant positive effects on the historic environment, including archaeology and green spaces of heritage value. Views in and out are protected in these policies, as well as through policy Q25 which protects strategic views including panoramas, landmark silhouettes and roofscape views. Policy Q25 acknowledges the important role roofscape plays in a viewer's appreciation of the wider cityscape. Green roofs should be supported to enhance these views of roofscapes.
- 5C8.21 Policies Q24 (River Thames) and Q26 (Tall and large buildings) should also result in positive effects on SA Objective 8. The supporting text of policy Q26 identifies potential locations where tall buildings are acceptable although the policy may benefit from a definition for 'tall' and 'large' building (i.e. height and square metres).

Places and Neighbourhoods policies PN1 – PN10

- 5C8.22 Policy PN1 on Waterloo will result in significant positive effects on the built and historic environment. The policy protects features and areas of historic and cultural value and their settings. The provision of cultural facilities and cultural events will be enhanced, particularly in the South Bank area, and the policy seeks to improve access and enjoyment of these areas as well. Locations for tall building are identified and it is clear there will need to be due regard to strategic views.
- 5C8.23 It is considered that policy PN2 for Vauxhall will also result in significant positive effects on SA Objective 8. Guidance on building heights acceptable for the Northern Gateway, Miles Street and Pascal Place would be helpful. The policy effectively enhances local character

and distinctiveness through proposed use of railway arches as an active spine, seeks to expand and consolidate cultural and evening economy and make improvements to open space provision. Design of the transport experiences will be improved, with removal of the gyratory and remodelling of the bus station which will result in significant improvements to the built environment as well as liveability and place. Proximity to the River Thames is maximised and respected in the policy to ensure improved use and design of the built and physical environment. Strategic views and local contextual consideration including heritage assets will be protected through high quality design. Given a new district centre will be created, it may be worth emphasising that buildings and architecture that reflect the cultural diversity, including equalities groups will be supported (although this is encapsulated in policy Q5). This will also help improve outcomes in relation to SA Objective 5 on equalities.

- 5C8.24 Policy PN3 for Brixton should result in significant positive effects for the built and historic environment. A number of public realm improvements are proposed (including provision for public art), and sensitive regeneration that recognises local heritage and the distinctive multicultural, diverse town centre and its specific character areas will be supported. Clause (i) supports preserving and enhancing all historic *frontages* along Brixton Road (emphasis added). This area is within a Conservation Area and thus there appears to be a conflict with this statement and policy Q23 which states that façade retention with the demolition of the remaining building is not considered appropriate in conservation areas. It is recommended this potential anomaly is reviewed by the Council. New spaces for creative and cultural industries are included in the policy, as are areas for theatre and arts facilities. The policy does not specifically identify locations where tall buildings within Brixton town centre would be acceptable; however the Brixton SPD contains this level of detail.

SA Recommendation: review interactions/conformity of policies Q22 Conservation Areas and PN3 Brixton in light of above.

Council response: Accepted. '...preserving and enhancing all historic frontages along Brixton Road and Electric Avenue' has been replaced with '...preserving and enhancing the Conservation Area; improving the range...'

- 5C8.25 Similarly, policy PN4 for Streatham supports regeneration that is sensitive to the centres conservation area status and valued heritage assets. Unlike Brixton policy PN3, the policy for Streatham identifies areas where taller landmark buildings of 'four storeys and above' are preferred (Streatham Hill and Streatham South). A maximum height has not been provided, however 'the scale and form of development will need to be appropriate to its location and relationship with the conservation area. Although not referred to in policy PN4, policy Q26 will also apply (as indeed all other Local Plan policies). In clause (b) it states that redevelopment of appropriate sites with buildings up to six storeys will be sought. The purpose of the landmark buildings in Streatham Hill and Streatham South is to reinforce a sense of destination. It is uncertain whether a six storey building in Streatham Central will detract in any way from the purpose of the landmark buildings (i.e. destination) in Streatham Hill to the north and Streatham South should these landmark buildings be four to six storeys in height, or indeed if they are not at least a few storeys taller than a six storey building proposed for Streatham Central. The likelihood of this scenario arising is also uncertain. The Council may wish to review this policy in terms of pursuing an improved quality, attractiveness and character of the built environment / urban design for Streatham.

- 5C8.26 It is considered that policies PN5 Clapham, PN6 Stockwell, PN8 Kennington/ Oval, PN9 Herne Hill, PN10 Loughborough Junction and PN11 Upper Norwood will likely result in significant positive effects for the built and historic environment. All these policies seek to

respect and reinforce the historic character and assets of the centres and ensure they are community centres for people with improvements to public realm. It is further recommended that reference to cyclists is included in improvements to environmental conditions of policy PN11.

- 5C8.27 Policy P7 for West Norwood should also result in significant positive effects for SA Objective 8. Taller buildings are supported in specific locations and are proposed to act as focal points and destination. The policy also seeks to respect the heritage environment and interest of West Norwood cemetery and the many listed buildings of the area. The policy also recognises locally important views and supports improvements to the public realm.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

- 5C8.28 All sites in Table 33 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 8.

Table 32: Significance criteria for SA Objective 8: Built and Historic Environment

| Positive | Negative |
|---|--|
| <ul style="list-style-type: none"> • Site will not impact on conservation areas, listed buildings and features of cultural and archaeological interest or their settings, and will contribute to protecting these features and their settings. • For tall buildings, site located in opportunity area identified for tall buildings and valued view protected. • Allocation contributes positively to open space provision and the quality of the public realm | <ul style="list-style-type: none"> • *Site contains a nationally important archaeological site (Scheduled Ancient Monument) • Potential impact on conservation areas, listed buildings and features of cultural and archaeological interest or their settings. • For tall buildings, site not located in opportunity area identified for tall buildings or impacts upon valued views. • Site would reduce open space provision or impact adversely on the public realm. |

* Indicates high level constraint

TABLE 33: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 8: BUILT AND HISTORIC ENVIRONMENT

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|---|--|---|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | <ul style="list-style-type: none"> - allocation retains 10 Royal Street and Holy Trinity Urban Centre that are considered to make a positive contribution to the conservation area - Allocation contributes positively to open space provision and the quality of the public realm by restricting building heights in the southern part of the site due to its proximity to Archbishop Park | <ul style="list-style-type: none"> - may impact on conservation areas, listed buildings and features of cultural and archaeological interest or their settings - site is in an archaeological priority area | <p>Design principles include:</p> <ul style="list-style-type: none"> --a layout that includes gaps between buildings to allow views through to the conservation area and registered park -- fronts onto and creates clear pattern of streets -- does not appear dominant from the south (where heritage assets are) - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | | <ul style="list-style-type: none"> - may impact on Grade II listed building on adjoining site | <p>Design principles include:</p> <ul style="list-style-type: none"> --building form with a stepped approach with building height of 2-4 storeys -- due consideration to neighbours in terms of overbearing impact, loss of light, privacy, noise and disturbance - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 3 | Vale Street Depot, Vale Street SE27 | | <ul style="list-style-type: none"> - Site allocation may potentially impact on the West Norwood Conservation Area to the west. - Site may impact on the Grade II listed cemetery adjoining the west of the site. - Site may impact on Grade II and II* listed monuments and boundaries of West Norwood Cemetery which adjoin to the west. - Site may impact on locally listed sites to the north and the north west of the site. | <p>Design principles include:</p> <ul style="list-style-type: none"> --respect setting of adjoining conservation area and listed monuments and the adjoining locally listed building -- ensure buildings do not impinge on the view of West Norwood Cemetery to St Stephens Church, Sydenham Hill -- due consideration to neighbours in terms of visual intrusion overbearing impact, loss of light, privacy, noise and disturbance - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> -Site will not impact on Conservation Area - contributes positively to open space provision (play space) | | <p>Design principles include:</p> <ul style="list-style-type: none"> --high quality design and appearance |
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> - Allocation contributes positively to open space provision and the quality of the public realm - site is within an opportunity area, however no desired building height for the site is provided, | <ul style="list-style-type: none"> - May potentially impact on conservation areas - May potentially impact Grade II and locally listed buildings near the site. | <p>Design principles include:</p> <ul style="list-style-type: none"> --varied footprint and skyline with development broken up to avoid replicating the wall like separation of York Rd from Waterloo Station |

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| | | <p>although varied skyline is preferred.</p> <ul style="list-style-type: none"> - design principles seek to maximise high quality design specific to the site and setting | | <ul style="list-style-type: none"> --<i>active frontages</i> - <i>improves/treats exposed flank wall of Victory Arch</i> - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 6 | Shell Centre, 2-8 York Road SE1 | <ul style="list-style-type: none"> - Allocation contributes positively to the quality of the public realm, including setting of Jubilee Gardens and improved links to Waterloo Station - site is within an opportunity area and allocation states that subject to impact on views and residential amenity taller buildings towards the north of the site may be acceptable - design principles seek to maximise high quality design specific to the site and setting -- design principles and key considerations relate to historic and built environment | <ul style="list-style-type: none"> - Site allocation is within the South Bank Conservation Area. - Site will impact on the locally listed Shell Garage within the area. - Site may potentially impact on the locally listed County Hall North Block to the south of the site. - The site is within an Archaeological Priority Area. | <p>Design principles include:</p> <ul style="list-style-type: none"> -- <i>retaining Shell Centre as a landmark</i> -- <i>frame and enhance setting of Jubilee Gardens</i> -- <i>retains view of London Eye from York Road</i> -- <i>addresses perceived canyon-like character to York Road</i> - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 7 | Waterloo Station, Waterloo Road SE1 | <ul style="list-style-type: none"> - allocation contributes positively to public realm - Site is within opportunity area however no guidance on height limits is provided except that design principles include consideration of impact on views and heritage assets on provision of any tall buildings over the station - design principles and key considerations relate to historic and built environment | <ul style="list-style-type: none"> - the site itself is locally listed - Site will impact on surrounding conservation areas and locally listed buildings. - Site may impact on surrounding locally listed buildings. | <p>Design principles include:</p> <ul style="list-style-type: none"> -- <i>sympathetic retention of listed Victory Arch and careful integration into new scheme</i> -- <i>sets back and steps back development from Lower marsh to address the setting of the conservation area and listed Fire Station</i> -- <i>active frontages</i> - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | <ul style="list-style-type: none"> - Site is within opportunity area and new development is of similar height to surrounding residential development - site provide public realm improvements particularly for cyclists and pedestrians | <ul style="list-style-type: none"> - site is close to grade II listed buildings | <ul style="list-style-type: none"> - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | <ul style="list-style-type: none"> - Within an Opportunity Area but allocation recognises site is inappropriate for tall buildings - Allocation contributes positively to open space provision and quality of public realm | <ul style="list-style-type: none"> - Site within South Bank Conservation Area and adjacent to locally listed buildings and protected views but design principles seek to avoid this | <ul style="list-style-type: none"> - Compliance with other Local Plan policies, particularly Quality of Built Environment policies - Appropriate, respectful and sympathetic design principles recognising historic assets |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, | <ul style="list-style-type: none"> - site is within an opportunity area and design principles seek to manage height, bulk, views and historic built form of area - allocations supports sympathetic reuse of the listed buildings without radical alteration or extension | <ul style="list-style-type: none"> - Impact on Grade II* listed buildings on site. - Site allocation will impact on the Albert Embankment conservation area. - Potential impact on Grade II* listed buildings to the East and the West of the Site. - The site is within an Archaeological Priority | <p>Design principles include:</p> <ul style="list-style-type: none"> --<i>silhouette of head quarters protected as viewed from across river</i> -- <i>ventilation obelisk retained</i> -- <i>does not obscure views of headquarters from Lambeth High Street</i> |

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|----|---|---|--|--|
| | Whitgift Street, the railway viaduct and Southbank House SE11 | <ul style="list-style-type: none"> - design principles and key considerations relate to historic and built environment specific for the site - creating of new publically accessible internal square | <p>Area.</p> <ul style="list-style-type: none"> - site within 'background areas' of strategic views from Primrose Hill to the Palace of Westminster and from Parliament Hill to the Palace of Westminster | <ul style="list-style-type: none"> -- ensures site continues to make positive contribution to townscape - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | <ul style="list-style-type: none"> - site within an opportunity area and allocation limits building height to 150m 'with buildings to the east of the viaduct reducing in scale to relate to existing residential buildings'; however the whole site is east of the viaduct. - allocation provides for public realm improvements and open space provision through new urban square and linear park - design principles and key considerations relate to historic and built environment specific for the site | <ul style="list-style-type: none"> - Impact on heritage assets within the vicinity. - Potential impact on the Vauxhall Conservation Area to the north east. - Potential impact on Grade II* listed buildings to the East of the Site. | <p>Design principles include:</p> <ul style="list-style-type: none"> -- protecting setting of adjoining conservation area and St Anne's Church -- avoids unacceptable canyon like development to the railway viaduct and allows views between buildings to provide views to the south - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | <ul style="list-style-type: none"> - site within an opportunity area and allocation limits building height to 150m - allocation provides for public realm improvements and open space provision through new urban square and linear park - retains listed building fronting Wandsworth Road | <ul style="list-style-type: none"> - site is within an Archaeological Priority Area - potential impact on grade II listed buildings in surrounding area | <p>Design principles include:</p> <ul style="list-style-type: none"> -- sets out buildings to define the street and spaces to be built to the back edge of pavements -- provides opportunities for public art -- avoids unacceptable canyon like development to the railway viaduct and allows views between buildings to provide views to the south - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | <ul style="list-style-type: none"> - site is within opportunity area and building heights are restricted to 150m - allocation provides for public realm improvements and new public square to north of site | <ul style="list-style-type: none"> - Site may potentially impact of Grade II listed building to the west of the site. - Site is within an Archaeological Priority Area. | <p>Design principles include:</p> <ul style="list-style-type: none"> -- sets out buildings to define the street and spaces to be built to the back edge of pavements and establishes a sense of place --river linkages - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 14 | Somerleyton Road SW9 | <ul style="list-style-type: none"> - allocation supports development that retains Carlton Mansions and allows continued public appreciation of the mural Nuclear Dawn | <ul style="list-style-type: none"> - Site may impact on conservation areas to the north of the site. - Site may impact on the Grade II listed Brixton | <p>Design principles include:</p> <ul style="list-style-type: none"> -- has an appearance from the railway line with significant gaps between buildings to give views |

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|----|--|--|--|---|
| | | | Village to the north of the site. - Site may impact on locally listed sites to the north and the north west of the site. | <i>across the site</i> -- <i>protects line of plane trees</i> -- <i>avoids monotony along frontage</i> - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 15 | Popes Road SW9 | - allocation provides public realm improvements and integration with development on Brixton Central site | - Site allocation may potential impact on the Brixton Conservation Area to the north and west. - Site may impact on the Grade II listed former St John's School to the north of the site | Design principles include: -- <i>provides a tall building with adequate public space at its base</i> - <i>protects character of adjoining conservation area and setting of listed former St John's school</i> - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 16 | Brixton Central (between the viaducts) SW9 | - allocation provides for public realm improvements - allocation consider low development as appropriate | - Brixton Station is within the Brixton Conservation Area. - site may impact on nearby Grade II listed Brixton Village and locally listed Walton Lodge Laundry | - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 17 | 'Your New Town Hall' SW2 | - allocation provides for public realm improvements and new outdoor civic open space | - Site contains listed Grade II (Town Hall) and locally listed (Ivor House and Electric Brixton) buildings - site will impact on Brixton Conservation Area as most of site is within it - site may impact on adjoining conservation areas and there are other important listed building nearby | Design principles include: -- <i>careful consideration of heritage assets and guidance on specific facades and external envelopes</i> - <i>building heights require careful consideration, especially if proposed as higher than existing</i> -- <i>redevelopment of Hambrook House should respect St Matthews Church and impact on townscape, street scene and conservation area</i> - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |
| 18 | 286 - 362 Norwood Road SE27 | - There are no heritage assets on or close to this site - allocation provides for public realm improvements and a new public square | - Potential impact on surround conservation areas | Design principles include: -- <i>respect rich conservation value and heritage of the town centre taking account building heights, setting and locally important views</i> -- <i>finer grain development rather than single block</i> - Compliance with other Local Plan policies, particularly Quality of Built Environment policies |

– In light of previous SA recommendations, site allocation 10 has been improved with respect to building heights and how the site allocation relates to surrounding historic area. These revisions to the site allocation mean more positive effects are likely with respect to SA Objective 8.

Summary of Policies and Site Allocations

5C8.29 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the amended Local Plan policies and site allocations will have significant positive effects on the existing baseline and in preserving and enhancing areas and buildings for their historic and/or archaeological interest and in the protection of their settings.

Table 34: Summary assessment of effects of Local Plan on built and historic environment

| Assessment of effects of the Local Plan on SA objective 8 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|---|-------|---|---|------------------------|
| Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets. | ++ | <p>The Local Plan contains sound policy to ensure Conservation Areas, listed buildings and settings, locally listed buildings, areas of archaeological potential valued views are protected appropriately. It is therefore considered that the key sustainability issues identified in Table 3 relating to heritage and the built environment are well provided for in the Local Plan.</p> <p>The Local Plan also contains robust policies for the quality of the built environment including urban design of individual developments, public realm, and protection and enhancement of amenity values.</p> <p>While many site allocations are within Conservation Areas, it is considered that design principles have been well thought through to respect the surrounding built and natural character of each allocation. Coupled with design policies of the Local Plan, any potential adverse effects on SA Objective 8 resulting from development of site allocations should be avoided and/or mitigated.</p> | The positive impact of preserving areas and buildings designated for their historic and/or archaeological interest will be achieved immediately, and continue to be over the long term for the Boroughs Conservation Areas and listed buildings and locally listed buildings. The positive impacts of enhancing areas and buildings will likely be achieved in the medium to long term as funding becomes available and as sensitive development in surrounding areas occurs. | Permanent and ongoing |

Recommendations for monitoring likely significant and uncertain effects

5C8.30 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § The number of buildings on the English Heritage Listed Buildings at Risk Register and the risk levels
- § Number of listed buildings within the Borough
- § Number of registered parks and gardens
- § Number of conservation areas with up to date character appraisals
- § Number of approved Archaeological Assessment Statements
- § Annual update Infrastructure Schedule

5C9. TRANSPORT AND TRAVEL

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

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

5C9.2 To achieve this objective, plan policies should reduce travel; encourage a shift to more sustainable forms of travel: walking, cycling and public transport; encourage greater efficiency in the transport network, such as through higher load factors; and integrate new development, especially residential development, with sustainable transport choices.

Relevant policy objectives

National Level

5C9.3 Current national transport policy is set out in the government's *Transport White Paper: The Future of Transport – A Network for 2030*. It identifies a need for a transport network that can meet the challenges of a growing economy and the increasing demand for travel, but one that can also achieve environmental objectives. Overall the key thrust of national policy is to reduce demand for the need to travel, particularly by car, to better manage the road network and to promote greater use of public transport, walking and cycling.

5C9.4 The *NPPF 2012* states that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.

Regional Level

5C9.5 The strategic approach of integrating transport and development in the *London Plan (2011)* is to encourage patterns of development that reduce the need to travel, especially by car. Improved capacity and accessibility of public transport, walking and cycling should be encouraged. Chapter 6 of the Plan provides policy on transport provision.

5C9.6 Policy 6.5 is on funding Crossrail and other strategically important transport infrastructure. The London Plan identifies the extension of the Northern Line to serve the Battersea area as an example of such infrastructure. The London Plan states this would be needed to realise the full potential of the Vauxhall, Nine Elms and Battersea Opportunity Area, delivering at least 10,000 new homes, 15,000 jobs and regeneration of Battersea Power Station.

Baseline conditions and existing issues

5C9.7 There are fourteen over-ground railway stations spread evenly throughout the borough. There are also eight underground stations mainly in the north of the borough, and many bus routes, with major interchanges at Waterloo, Vauxhall and Brixton (see Figure 5). Waterloo is the busiest over-ground terminal in England by passenger numbers. Access to public transport is good in north and central Lambeth. However, residents in Streatham and West Norwood are dependent on rail and bus connections. These tend to be focussed on the main north-south radial routes into central London rather than east-west orbital routes, which means that some housing estates in particular continue to have low levels of public transport accessibility.

- 5C9.8 Accessibility to public transport is important to ensure that people can move around Lambeth with ease. As Lambeth is amongst the highest nationally for households with no car or van (in line with Inner London) (Census 2011), there is even more reliance on public transport. Lambeth residents have a total of 67,000 cars, compared to 73,000 in 2001. the proportion of households with no car of van has increased from 51% to 58% (Census 2011). However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. This situation will worsen with increasing living and working populations. Ultimately this will impact on access to jobs, Lambeth's economic wellbeing and the attractiveness of the borough to investors.
- 5C9.9 The Infrastructure Schedule provides details of proposed transport projects that seek to improve transport in the Borough. For example, the East London Line extension to Clapham Junction seeks to increase capacity of the London Over-ground network. A new station will be provide at Clapham High Street. Funding has been committed for this part of the project. The project offers opportunity to link Brixton to this Overground network, which would benefits the Borough, particularly residents of Brixton. However, funding has not been committed to provide a new station at Brixton for the East London Line Extension. An appropriate replacement for the former Cross River Tram is also proposed in the Schedule. This seeks to alleviate over-crowding on the Northern line and main line rail stations along its route. It would provide interchanges with twelve tube stations on nine different lines and four main-line stations. Again, funding has not been identified to further this proposal. The Northern Line Extension with a new station at Nine Elms will enable and support development and growth within the Vauxhall Nine Elms Battersea Area. It is expected to be funded by the private sector, although to date, full funding had not been committed and remains uncertain. Indeed the delivery of the extension is uncertain until it has been approved through the Transport Works Act Order and Treasury.
- 5C9.10 Journey times on buses have improved significantly in the borough over the last five years. Bus speeds have increased or remained stable across the AM-peak, Interpeak and PM-peak period, unlike other central London boroughs where speeds have decreased. Excess Wait Time (EWT) has reduced by 49% from 2.34 minutes (1999/00) to 1.18 mins (2008/09).
- 5C9.11 In 2001, approximately 90,000 people travelled out of Lambeth to work every day and another 61,500 travelled into Lambeth from other parts of London (2001 Census). Nearly 60 per cent of Lambeth workers travel to work by public transport, compared to just 14 per cent nationally. Much of the public transport infrastructure in Lambeth is currently operating at or over capacity during peak hours.
- 5C9.12 The Cross River Tram (CRT) project, for a new tram that would run from Brixton and Peckham to Camden and King's Cross via Euston and Waterloo was first proposed in 2002. Due to funding constraints this project is on hold and instead discussions with partners on potential alternatives to the scheme are occurring.
- 5C9.13 The Council operates three electric charge points in the Borough. The electric charge points are located in:
- Pulross Road, Brixton. SW9 8AA
 - Upper Ground, Waterloo SE1 9PP
 - Concert Hall Approach, Waterloo. SE1 8XU
- 5C9.14 Car owners in Lambeth are currently being given the opportunity to exchange their resident's parking permits for free car club membership and drive time.

- 5C9.15 The borough has an extensive network of footway's adjacent to the highway network and these are used for the majority of walking trips in Lambeth. Lambeth also has three strategic walking routes. These are the Capital Ring, Jubilee Walkway and the Thames Path. The borough also has a number of green spaces and parks that are used by pedestrians as a traffic free alternative.
- 5C9.16 There are more than 20 docking stations for the Barclays Cycle Hire Scheme in Lambeth Borough. Waterloo Station is the most frequently used docking station for both docking and hiring (TfL website July 2012). In addition the Borough has a good network of cycle routes including Cycle Superhighway Route 7 from Merton to the City (route 5 from Lewisham to Victoria via Vauxhall is expected to be in place by 2013), London Cycle Network routes 3, 5 and 25 and National Cycle Route 4.
- 5C9.17 There are many busy A-roads in Lambeth including the A23 main road from London to Brighton which runs the length of the borough, the A3 which runs south from Elephant and Castle through Kennington, Stockwell and Clapham, and the A205 South Circular Road which cuts East-West across the borough. The total length of road network in Lambeth is 390.2 km (Oct 2007). Traffic congestion is a serious concern for residents, with a perception that major roads can divide communities.
- 5C9.18 Whilst Crossrail does not affect the borough directly, it may allow a more convenient interchange for travel around London for certain journeys. It has the potential to move investment away from Lambeth and to areas which will be served by Crossrail, and also limits available funding for other schemes in the Capital.
- 5C9.19 Developments in the Vauxhall area are exempt from paying contributions as set out in the Mayor's Crossrail SPD, instead all contributions will be retained for local transport schemes as a reflection of the lack of benefit to Lambeth of the Crossrail scheme.
- 5C9.20 However, the Mayor has recently implemented the CIL Levy which is intended to provide up to £300M funding for Crossrail. This includes all developments within Lambeth including Waterloo and Vauxhall. This is on top of any local CIL and s106 requirements and has the potential to affect viability of development within Lambeth, meaning that it may not be possible to obtain appropriate mitigation measures from developers.

Likely evolution without the Plan

- 5C9.21 The Core Strategy and saved UDP policies will be considered out-of-date under the NPPF and accordingly reliance will be had to policy within the Local Plan and NPPF. Opportunities for local transport improvements (including walking, cycling and public transport) and an integrated approach to development may be lost in the absence of the Local Plan.

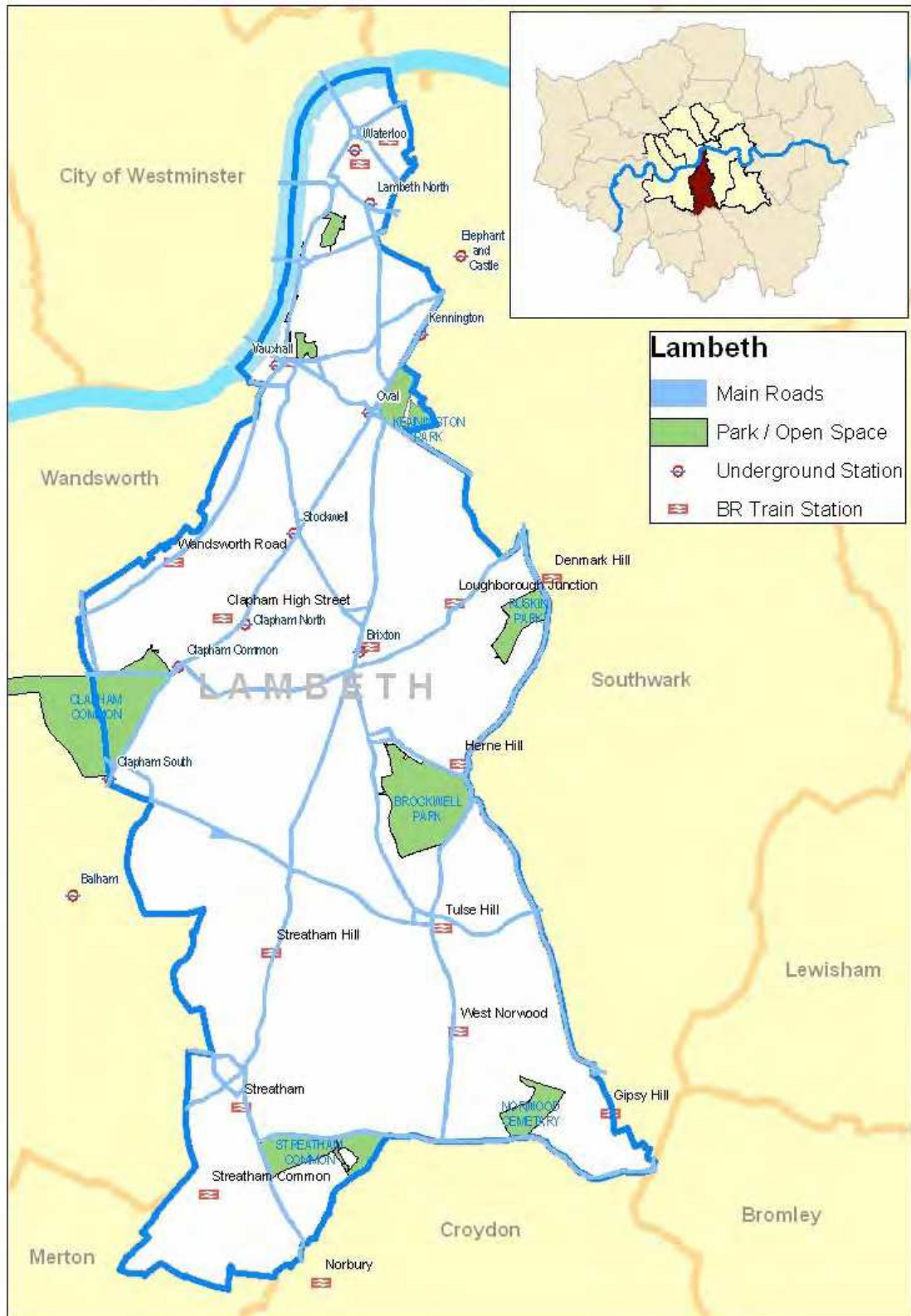


Figure 5: Main public transport provision in Lambeth

Assessment of Policies

5C9.22 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 9 Transport and Travel. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.

5C9.23 The following policies have been screened as having potential for significant effects on this objective:

| | |
|--|---|
| D1 – Delivery and monitoring | S2 – New or improved community facilities |
| D2 – Presumption in favour of sustainable development | T1 – Sustainable travel |
| D3 – Infrastructure | T2 – Walking |
| D4 – Planning obligations | T3 – Cycling |
| H1 – Maximising housing delivery | T4 – Public transport infrastructure |
| H6 – House conversions | T5 – River transport |
| H7 – Student housing | T6 – Assessing impacts of development on transport capacity |
| H8 – Housing to meet specific community needs | T7 – Parking |
| H9 – Hostels and houses in multiple occupation | T8 – Servicing |
| H10 – Gypsy and Traveller Needs | T9 – Mini-cabs, taxis and private hire vehicles |
| ED3 – Large offices | EN7 – Sustainable waste management |
| ED4 – Work-live development | PN1 – Waterloo |
| ED5 – Railway arches | PN2 – Vauxhall |
| ED 6 - Town centres | PN3 – Brixton |
| ED7 – Evening economy and food and drink uses | PN4 – Streatham |
| ED11 Local centres and dispersed local shops | PN5 – Clapham |
| ED12 – Visitor attractions, leisure, arts and culture uses | PN6 – Stockwell |
| ED12 – Hotels and other visitor accommodation | PN7 – West Norwood |
| ED13 – Markets | PN8 – Kennington / Oval |
| | PN9 - Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and Monitoring policies D1 – D4

5C9.24 Policies D1- D4 will contribute towards the attainment of SA Objective 9 through working with a range of partners (including Transport for London and Network Rail), delivering regeneration defined in Opportunity Area Planning Frameworks and local areas master-plans, including infrastructure to support growth. The Council will work with a range of partners and encourage dialogue between service providers and developers. Section 106 funding will provide or fund local improvements such as those to public realm, walking and cycling improvements, transport infrastructure, highways and traffic works, car clubs, parking restrictions and travel plans which will likely result in positive effects on travel and transport in the Borough. However, deliverability of major transport projects can be uncertain, for example replacement of the proposed Cross River Tram, timely delivery of Northern Line extensions (prior to occupation of new surrounding developments) and it is critical public transport capacity and infrastructure keeps pace with increased population resulting from proposed significant growth, including housing.

Housing policies H1, H6 – H10

5C9.25 Policy H6 seeks to protect family sized homes from conversions. The policy seems to allow conversions on the main road network, or for family homes that are larger than 150 sqm, provided a number of criteria are met, one being that the proposal does not have an unacceptable impact on parking conditions and traffic congestion in the area. Conversions on the main road network are likely to have good access to public transport (particularly buses) and it is considered that the policy seeks to avoid increases in the overall level of road traffic. Policy H7 provides for student housing which among other criteria, need be located in an area with good public transport access and easy access to local shops,

workplaces, services and community facilities. Previous recommendation to ensure PTAL 4 or more and easy access to shops seeks to result in more positive effects for students the environment and the road network in terms of attaining SA Objective 9.

- 5C9.26 Similarly, policies H8 (housing to meet specific community needs), H9 (hostels and houses in multiple occupation) and H10 (gypsy and traveller needs) seek to provide these housing types in locations that are accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended users (H8 and H9). These uses need be on a site and in a location suitable for the particular use having regard to amenity, transport and other environmental impacts. Previous SA recommendation sought to specify more guidance (i.e. a PTAL) on accessibility to local services / facilities for each of these uses. Council response to this is that accessibility needs to be appropriate to the needs of the intended occupiers and accordingly each proposal will be assess having regard to the PTAL level of the site.

Economic development and town centre policies ED3 – ED7, ED10 – ED13

- 5C9.27 Policies ED1 and ED2 seek to maintain a stock of employment generating land in the Borough and therefore provide some residents with a reduced need to travel outside of the borough for work. Policy ED3 states that outside of specific location (the major centres), large office development will only be supported where the PTAL level is 4 or above, and therefore seeks such development that encourages and integrates new development with sustainable transport choices and access. Policy 4 on work/live development provides opportunity for reduced need to travel by allowing a work element together with residential use. Policy ED5 ensures that railway arches are not normally used for parking. Policy ED6 on town centres provides provision for residential use above shops and on other appropriate sites, thereby reducing demand on public transport infrastructure for some in accessing daily goods, services, facilities. The policy also supports the vitality and viability of a mix of town centre uses, increasing the likelihood that more residents have access to their everyday needs within the borough, and therefore reducing the need to travel outside the borough and reducing demand on the transport infrastructure. Promoting local economies in town centres supports a 'star and cluster' development approach (rather than traditional 'centre and spoke' form of linear development, that helps reduces the need for people to travel.

- 5C9.28 Like policy ED6, policy ED10 seeks to protect the role of local centres and local shops in meeting the day to day needs of communities. These local centres provide good accessibility (either by walking or cycling) to residents for their daily needs and therefore are consistent with the aim of SA objective 9. Visitor attractions, leisure, arts and cultural uses are supported in specific locations in the Borough (policy ED11) and any such proposals require a visitor management plan on how the potential impacts of high volumes of visitors will be managed. While not explicitly, it is expected that in addition to coach parking, an element of the visitor management plan would also relate to more general travel and transport, including public transport, walking and cycling. Policy ED12 seeks to integrate planning and transport by stating that hotels and other visitor accommodation outside of specified locations should be located in areas with PTAL 'good' (4) or above. In addition to transport policies promoting active travel, it is considered that positive effects on SA 9 should result from the economic development and town centre policies.

Social infrastructure policies S2

- 5C9.29 Policy S2 on new or improved community premises states that 'the site or buildings are appropriate for their intended use and *accessible* to the community'. In response to previous SA recommendation, the supporting text clarifies that new community premises should be conveniently located and easily reached on foot, by bicycle or public transport. Clause (a)(ii) seeks to minimise traffic generation, congestion, parking and negative impacts in road safety. The supporting text states that places of worship are encouraged in

areas of high public transport accessibility, such as town centres, given their potential impact on highways. Clause (c) of the policy states that large residential schemes and housing estate regenerations should include appropriate provision of social infrastructure and local shops to meet local demand where this cannot be met through existing facilities. This is commended as it seeks to reduce the need to travel.

Transport policies T1 – T9

5C9.30 Overall it is considered that all transport policies (T1 – T9) will likely result in significant positive effects on SA Objective 9, particularly policy T1 that makes clear the Council will promote a sustainable pattern of development in the borough, minimising the need to travel and reducing dependence on the private car. Policies T2 and T3 seek to improve conditions for active travel. In response to previous SA recommendations, policies T2, T3, T4, T5 and T6 have been improved to take account of desire lines, ensure safe active travel environments, covered and appropriate numbers of cycle parking facilities, and avoiding unacceptable impacts on traffic generation, impact on traffic flows and local parking.

5C9.31 It is further recommended that planning applications do not have unacceptable transport impacts on the environment, or amenity of an area through air quality, noise and disturbance and accordingly this should be reinstated to Policy T6(a). Servicing is covered within policy T8.

Environment policy EN7

5C9.32 Waste management does not necessarily reduce travel as waste vehicles are needed to collect and dispose of Borough waste. However, proposals for new and improved waste facilities will be assessed against Annex E of PPS 10 which includes traffic and access, and policy T8 on servicing will also apply for waste vehicles.

Places and neighbourhoods policies

5C9.33 Policy PN1 on Waterloo maximises its strategic location and high public transport accessibility by providing for a range of uses including tourist / leisure / entertainment, offices, hotels, healthcare, housing, services and shopping. The policy also supports improvements in transport capacity and interchange quality of Waterloo Station, including improved permeability for pedestrians. Improvements in capacity will be necessary with projected population growth. Overall it is considered that policy PN1 will result in positive effects on SA Objective 9.

5C9.34 Similarly, policy PN2 for Vauxhall maximises the potential of its location by supporting a range of mixed uses including retail, employment, housing, hotel, leisure, entertainment and community uses that will enable reduced need to travel. Additionally, the policy seeks to improve the transport experience including public transport capacity, walking and cycling. It is proposed that the bus station will be remodelled and the gyratory will be removed, thereby improving public realm, connectivity and more simplified road junctions and crossings for walkers, cyclists, public transport users and motorists alike. It is considered that policy PN2 will result in significant positive effects on SA Objective 9. However, delivery of necessary transport infrastructure to support projected growth in this area is unlikely to be in place before developments are occupied. There is also currently a funding gap for the much needed capacity improvements for Vauxhall Rail Station. Additionally, policy ED14 seeks to provide local jobs to local people and this will include the many construction jobs in Vauxhall. There is some risk that workers are or will travel by private car, particularly if they live south in the Borough where public transport is less well served in terms of choice.

5C9.35 Brixton policy PN3 also seeks to capitalise on its transport infrastructure and major town centre status by providing for mixed use development. The policy also seeks to improve

the environment for cyclists and pedestrian movements and improve the quality of public transport provision, accessibility and interchange. The policy promotes sustainable forms of travel and will reduce the need to travel by local people. However an opportunity to maximise positive effects on SA Objective 9 may be lost if funding cannot be secured for a new London Overground station at Brixton.

- 5C9.36 Accessibility and use of public transport, walking and cycling are all supported in Streatham through improvements to public transport facilities, the public realm, and measures to reduce the impact and dominance of road traffic. As a major centre, Streatham also capitalises on its function as a town centre by encouraging mixed use developments. The policy acknowledges the need for a level of car parking appropriate to the nature and scale of development, although the policy does not seek a level of car parking in excess of maximum levels set out in policy T7 (i.e. London Plan maximum parking standards).
- 5C9.37 Policy PN5 for Clapham supports enhancements to the public realm of the town centre to improve vehicle movements and the environment for pedestrians and cyclists. This should encourage more active travel and greater efficiency of the transport network on roads. Policy PN6 for Stockwell seeks to enhance sense of place by improvement to traffic and environmental conditions for pedestrians and cyclists (in response to previous SA recommendation). Policy PN10 on Loughborough Junction seeks to maximise positive effects on SA Objective 9 as it proposes a number of sustainable transport measures such as bike hire stations, all necessary services including access to employment within close walking distance of every home, reduce the number of people driving through the area particularly for journeys less than two miles and improving walking and cycling routes.
- 5C9.38 On balance, it is considered the places and neighbourhoods policies seek to improve traffic and environmental conditions for pedestrians and cyclists and maximise public transport use and accessibility by encouraging mixed use developments in town centres. It is considered that the places and neighbourhoods policies effectively contribute to attaining SA Objective 9.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C9.39 All sites in Table 36 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 9.

Table 35: Significance criteria for SA Objective 9: Transport and Travel

| Positive | Negative |
|--|--|
| <ul style="list-style-type: none"> • Site location reduces the need to travel and promotes walking, cycling and public transport. • Promotes integrated transport. • Promotes mixed use development. • Promotes easy access to local services and facilities. • Promotes low carbon fuel technology. • Reduces congestion. • Allocations that generate high levels of trips located with high levels of public transport accessibility (i.e. less than 400m from a bus stop or train/tube station). • Existing transport capacity sufficient to cater for allocation/ or plans for an increase in capacity to cater for development. | <ul style="list-style-type: none"> • Promotes unsustainable travel patterns like private car use. • Segregates land uses to a degree that promotes longer trips by unsustainable modes. • Worsens access to key local services and facilities. • Fails to promote low carbon fuel technology. • Worsens congestion. • Allocations that generate high levels of trips not located with high levels of public transport accessibility. • Existing transport capacity insufficient to cater for allocation/ no plans for increase in capacity. |

TABLE 36: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 9: TRANSPORT AND TRAVEL

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|--|---|---|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | <ul style="list-style-type: none"> - Allocations that generate high levels of trips located with high levels of public transport accessibility (i.e. less than 400m from a bus stop or train/tube station). - Site location reduces the need to travel and promotes walking, cycling and public transport. - Existing transport capacity sufficient to cater for allocation/ or plans for an increase in capacity to cater for development - Promotes mixed use development. | | Compliance with Local Plan policies |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | <ul style="list-style-type: none"> - site within 400m of bus and rail access | | Compliance with Local Plan policies |
| 3 | Vale Street Depot, Vale Street SE27 | | <ul style="list-style-type: none"> - Allocations (school) may generate high levels of trips and site is not located with high levels of public transport accessibility. - allocation result in private car usage through recycle centre and may include drop-off and pick-up from school. | Compliance with Local Plan policies |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> - Site promotes sustainable travel through school travel plan - Very good public transport accessibility | <ul style="list-style-type: none"> - Allocations (school) may generate high levels of trips but has very good public transport accessibility - allocation may include drop-off and pick-up from school | Compliance with Local Plan policies School Travel Plan |
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m from public transport - promotes easy access to local services and facilities - plans to increase capacity at Waterloo to cater for development | | Compliance with Local Plan policies |
| 6 | Shell Centre, 2-8 York Road SE1 | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m from public transport - promotes easy access to local services and facilities - plans to increase capacity at Waterloo to cater for development | | Compliance with Local Plan policies |

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| | | | | |
|----|--|--|---|-------------------------------------|
| 7 | Waterloo Station, Waterloo Road SE1 | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m from public transport - promotes easy access to local services and facilities - plans to increase capacity at Waterloo to cater for development | | Compliance with Local Plan policies |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m from public transport - promotes easy access to local services and facilities - plans to increase capacity at Waterloo and Cornwall Road Bus Garage to cater for development | | Compliance with Local Plan policies |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m from public transport - promotes easy access to local services and facilities - plans to increase capacity at Waterloo to cater for development | | Compliance with Local Plan policies |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site close to public transport - promotes easy access to local services and facilities - plans to increase capacity at Waterloo and Vauxhall to cater for development | | Compliance with Local Plan policies |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m public transport - promotes easy access to local services and facilities - plans to increase capacity at Vauxhall and extension to Northern Line to cater for new developments in area | - new primary school could increase vehicle journeys associated with drop-off and pick-up of children | Compliance with Local Plan policies |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m from public transport | | Compliance with Local Plan policies |

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| | | | | |
|----|---|---|--|-------------------------------------|
| | viaduct to the east SW8 | <ul style="list-style-type: none"> - promotes easy access to local services and facilities - plans to increase capacity at Vauxhall and extension to Northern Line to cater for new developments in area | | |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m from public transport - promotes easy access to local services and facilities - plans to increase capacity at Vauxhall and extension to Northern Line to cater for new developments in area | | Compliance with Local Plan policies |
| 14 | Somerleyton Road SW9 | <ul style="list-style-type: none"> - site location reduces need to travel - promotes mixed use development - promotes easy access to local services and facilities - existing transport capacity sufficient to cater for allocations - Part of Site within 400m of bus and rail links. | | Compliance with Local Plan policies |
| 15 | Popes Road SW9 | <ul style="list-style-type: none"> - site allocation provides for cycle parking - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m from public transport - promotes easy access to local services and facilities | <ul style="list-style-type: none"> - site allocation provides for car parking which will increase traffic and congestion - fails to promote low carbon fuel technology | Compliance with Local Plan policies |
| 16 | Brixton Central (between the viaducts) SW9 | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m from public transport - promotes easy access to local services and facilities - Site allocation improves public transport infrastructure through new station entrance and pedestrian links | | Compliance with Local Plan policies |
| 17 | 'Your New Town Hall' SW2 | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development - site less than 400m from public transport - promotes easy access to local services and facilities | | Compliance with Local Plan policies |
| 18 | 286 - 362 Norwood Road SE27 | <ul style="list-style-type: none"> - site location reduces need to travel and promotes walking, cycling and public transport - promotes integrated transport - promotes mixed use development | <ul style="list-style-type: none"> - site allocation provision for car parking - promotes unsustainable travel patterns of using private car - may increase traffic and congestion | Compliance with Local Plan policies |

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| | | | | |
|--|--|--|---|--|
| | | - site less than 400m from public transport - promotes easy access to local services and facilities | - fails to promote low carbon fuel technology | |
|--|--|--|---|--|

Summary of Policies and Site Allocations

5C9.40 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will have significant positive effects albeit with some level of uncertainty on improving baseline public transport use; and reducing the need to travel by promoting sustainable patterns of urban development (table overleaf).

Recommendations for monitoring likely significant and uncertain effects

5C9.41 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § Mode of travel, particularly commute to and from work
- § Number of people who work locally
- § Walking mode share based on all trips originating within Lambeth - target 32% by 2026
- § Cycling mode share based on all trips originating within Lambeth - target 8% by 2026
- § Annual update of Infrastructure Schedule.

| Assessment of effects of the Local Plan on SA objective 9 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|--|-------------|---|---|---|
| <p>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>++/?</p> | <p>On the whole it is considered that the Local Plan has been produced with the premise of sustainable patterns of urban development actively borne in mind. Sites earmarked for future comprehensive redevelopment are in locations that have potential to facilitate efficient accessibility to both areas within and outside of the Borough.</p> <p>Similarly, appropriate town centres are allocated for higher levels of growth in mixed developments, making use of current (and future) accessible transport networks. Policies effectively seek to address key transport issues in Lambeth.</p> <p>All site allocations should result in significant positive effects on SA Objective 9 although the provision of schools may increase journeys related to school drop off and pick up. However, school travel plans should help mitigate this and encourage more active travel.</p> <p>However, while the Local Plan theoretically makes provision for reduced need to travel through more sustainable patterns of urban development; the difficulty and uncertainty lies in the timely delivery of necessary improved public transport infrastructure and capacity through identified and committed funding sources (for example a new station at Brixton for London Overground line, the northern line extension to Nine Elms, and an appropriate replacement for the former Cross River Tram, and Vauxhall overground capacity improvements).</p> | <p>Comprehensive achievement of this objective may be evident in the longer term as larger scale developments are completed.</p> <p>Positive effects from more local measures, such as improving cycle and pedestrians paths are more likely to be evident in the short to medium term.</p> <p>The Local Plan is reliant on the delivery of improved public transport infrastructure, particularly on increasing capacity during peak times. It is likely that the extension of the northern line to Nine Elms will be delivered, however it is the timing of this relative to occupied new developments that is uncertain. To maximise sustainability outcomes and enable sustainable lifestyles and achievement of SA Objective 9 such infrastructure needs to be in place before occupation of the Opportunity Area.</p> <p>Currently there is no commitment to the necessary funding for a new station at Brixton for the London Overground. It is uncertain if this will be delivered as it does not appear in the current TfL Business Plan. Therefore, it is recommended that the Council works to include the new station in the next TfL Business Plan, which will cover ten years from 2018.</p> <p>Annex 2 of the Local Plan sets out expected timescales for infrastructure delivery.</p> | <p>Temporary effects associated with construction of new northern line extension and other infrastructure and capacity improvements; however it is considered that these temporary effects can be managed on-site, and through agreement on working hours and days.</p> <p>Once the extension of the northern line is in place and operating, the significant positive effects for Vauxhall area in particular will be permanent but it is recognised that capacity levels will need to be regularly reviewed and improved thereafter as necessary.</p> |

5C10. BIODIVERSITY

5C10.1 This section of the SA relates to the sustainability performance of the Local Plan against:

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

5C10.2 To achieve this objective, plan policies should conserve and enhance habitats and provide for the long-term management of natural habitats and wildlife, protect and enhance access to open space and improve the quality of publicly accessible green space; increase and enhance the resilience of Lambeth's key priority habitats and species in line with its Biodiversity Action Plan's long term vision and objectives; encourage replacement of valuable lost habitat; and bring nature closer to people i.e. help conserve local nature conservation amenity, including gardens.

5C10.3 Specifically designated wildlife sites, sites of special scientific interest, local and metropolitan open spaces should also be protected.

Relevant policy objectives

International Level

5C10.4 The *Directive 92/43/EEC* on the Conservation of Natural Habitats and Wild Flora and Fauna – the 'Habitats Directive' provides legal protection for habitats and species of European importance. It requires the maintenance or restoration of habitats and species of interest to the EU in a favourable condition.

National Level

5C10.5 *Working with the grain of nature: a biodiversity strategy for England (2002)* sets out the Government's vision for conserving and enhancing biological diversity in England, together with a programme of work to achieve it. It includes the broad aim that planning, construction, development and regeneration should have minimal impacts on biodiversity and enhance it wherever possible.

5C10.6 Paragraphs 109 – 119 of the *National Planning Policy Framework 2012* relate to conserving and enhancing the natural environment. The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible.

Regional Level

5C10.7 Policy 7.19 of the *London Plan (2011)* covers Biodiversity and access to nature. The policy seeks development to make a positive contribution to the protection, promotion and management of biodiversity, including enhancement of London BAP habitat targets and improving access to wildlife sites. Other policies seek to promote and protect biodiversity and green infrastructure; make provision for green roofs and; protection of open spaces.

Local Level

5C10.8 The *Lambeth Biodiversity Action Plan (2006)* contains a set of action plans for priority habitats and species which are important to Lambeth and the people who live and work in the Borough. Priority habitats are woodlands; tidal Thames; built environment; railway line sides; private gardens; ponds and open water; parks and greenspace; churchyards and cemeteries; allotments and community gardens and;

acid grassland. Priority species include stag beetle; reptiles; mistletoe; house sparrow; crucian carp; blackbird and bats.

Baseline conditions and existing issues

- 5C10.9 Lambeth has identified 10 priority habitats and seven priority species for the Borough. Lambeth has many highly valued areas of open space, but in some parts of the Borough, particularly in the north, this is in short supply relative to the level of resident population. Pressures on open spaces are expected to become more intense with population growth. There are very limited opportunities to create new public open space in the Borough, but two are the creation of the new Waterloo City Square and an extension to Jubilee Gardens.
- 5C10.10 The Borough has four Local Nature Reserves, six Metropolitan Open Land spaces, 28 district and local opens spaces, as well as a number of other smaller areas of open space. Additionally the Borough has 45 designated Sites of Importance for Nature Conservation (SINCs). Of these, 43 sites (or 96%) are or have been in positive conservation management in 5 years prior to 31/3/2012.

Likely evolution without the Plan

- 5C10.11 Without the Local Plan, the Council would rely on the provisions of the London Plan, and the habitat and species action plans within the Lambeth Biodiversity Action Plan. There may be a greater risk that increased population and economic activity will place an increased demand on water, biodiversity and open space and without the Local Plan development may occur in areas that may disproportionately exacerbate issues with access to open space. Developers will still need to comply with legislation protecting biodiversity, for example Wildlife and Countryside Act.

Assessment of Policies

- 5C10.12 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 9 Transport and Travel. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.
- 5C10.13 The following policies have been screened as having potential for significant effects on this objective:

| | |
|---|------------------------------------|
| D1 – Delivery and monitoring | Q13 – Cycle storage |
| D2 – Presumption in favour of sustainable development | Q14 – Development in gardens |
| D3 – Infrastructure | Q21 – Registered parks and gardens |
| D4 – Planning obligations | Q23 – Undesignated heritage assets |
| D5 - Enforcement | Q25 – Views |
| H5 – Housing standards | PN1 – Waterloo |
| T5 – River transport | PN2 – Vauxhall |
| EN1 – Open space | PN3 – Brixton |
| EN2 – Local food growing and production | PN4 – Streatham |
| EN4 – Sustainable design and construction | PN5 – Clapham |
| EN6 – Sustainable drainage systems and water management | PN6 – Stockwell |
| Q9 – Landscaping | PN7 – West Norwood |
| Q10 - Trees | PN8 – Kennington / Oval |
| Q11 – Building alternations and extensions | PN9 - Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and Monitoring policies D1 – D5

5C10.14 In terms of biodiversity impacts, policy D1 that seeks to maximise use of previously developed land and vacant buildings, may result in adverse effects on local species such as bats (which roost in buildings and roofs) or black redstarts or reptiles (which make use of brownfield environments). However, such species are protected by law, and ecological surveys required as part of planning applications should avoid adverse impacts on such species and habitats. Measures such as brown roofs replicate brownfield environments. Growth, and infrastructure required to support such growth, can result in significant adverse effects upon local biodiversity unless appropriate avoidance and mitigation measures are implemented. The Local Plan contains policies to protect biodiversity, in addition to conditions attached to planning permissions to further protect and enhance biodiversity. Policy D4 on planning obligations also seeks to ensure that development proposals provide or fund local improvements to mitigate the impact of development. A list of improvements is then provided and as a result of previous SA recommendation, 'mitigation of impacts on and/or enhancements of biodiversity and wildlife habitats' is now included within policy D4. Given the importance of biodiversity, the vast benefits it provides (such as health, environmental, climate change adaptation, intrinsic and visual amenity), in particular its importance commensurate to the other improvements mentioned, and that 80% of the Borough is classified as built environment; it was considered important that the list specifically provide for biodiversity.

5C10.15 As highlighted previously (in the appraisal against SA Objective 7) there is some concern, particularly regarding cumulative impacts on biodiversity with the policy approach of policy D5 Enforcement.

Housing policy H5

5C10.16 The significant number of new dwellings proposed for the Borough has potential to adversely impact on biodiversity and open spaces. However, other policies actively seek to protect biodiversity and designated open spaces and create new open space in areas deficient. It is estimated that about 20% of Lambeth is covered in private gardens. To further maximise this, it was highlighted in previous SA work that the Housing Standards policy should provide opportunity to enhance and make a positive contribution to the Borough's biodiversity. Accordingly, the policy has been improved to contain reference to sustainable landscape principles including promotion of biodiversity and food growing.

Transport policy T5

5C10.17 This policy seeks to protect biodiversity of the River Thames where there are proposals for new piers or improvements to existing piers.

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

5C10.18 Open space is defined in supporting text paragraph 9.1 and it includes protecting and maintaining a wide range of parks and open spaces, including communal squares and gardens. The policy has been improved in terms of clarity in response to previous SA recommendation.

5C10.19 Policy EN1(b) seeks to conserve and enhance biodiversity, and has been positively improved with regards to achieving SA Objective 10 in response to previous SA recommendation. Previously the clause sought to protect, enhance, create and manage sites of nature conservation or biodiversity interest. Following SA recommendation the policy now more appropriately seeks to protect biodiversity generally (rather than identified sites) and therefore significantly mitigates potential adverse effects on biodiversity in the borough.

- 5C10.20 Previous SA recommendation to allow food growing on sites other than residential helps to improve biodiversity and bring nature closer to people. As mentioned above with regards to policy D1, use of vacant or derelict land or buildings for food growing will need to be mindful of species on site, for example bats in roof crevasses, and reptiles or stag beetles on vacant land or in derelict buildings (in line with EU legislation).
- 5C10.21 Policy EN4 makes reference to living roofs and walls 'where feasible and appropriate to the character and context of the development'. Previous SA work questioned how living roofs and walls could be inappropriate, with perhaps the exception to listed buildings. Supporting text paragraph 9.25 has been improved to clarify the policy intent and confirms that the design living roofs and walls should be appropriate to the character and context of the development. Also in response to previous SA recommendation, proposals for living roofs and walls should include a maintenance plan for the lifetime of the development. These amendments to policy result in positive effects with regards to SA Objective 10 but also SA Objectives 2 (health), 7 (liveability), 11 (climate change) and 14 (air quality).
- 5C10.22 It is considered that policy EN6 on sustainable drainage systems and water management should result in positive effects for biodiversity.

Quality of built environment policies Q9 - Q11, Q13, Q14, Q21, Q23, Q25

- 5C10.23 In response to previous SA recommendations, policies Q9 (landscaping) and Q10 (trees) have been amended to help achieve net increase in biodiversity. Landscaping should maximise opportunities for greening, and enhance existing planting and landscape features, and wherever appropriate provision of new trees should be included in new developments, in addition to taking account of existing trees on site and adjoining land. These amendments to policy help more effectively achieve SA Objective 10.
- 5C10.24 Similarly, policy Q11 Building Alterations and Extensions which applies to all buildings and not just those within conservation areas, has been improved in response to previous SA recommendation so that living roofs are generally supported in the policy.
- 5C10.25 Previous SA work sought to amend policy Q13 (b) (iii) to acknowledge gardens as a priority habitat in the Borough and therefore 'not accept cycle storage that compromises the visual amenity *or biodiversity* of front gardens / forecourts' (emphasis added). The Council is reluctant to include this amendment in policy as they are not convinced how much contribution front gardens make to priority habitats (larger rear gardens, away from noise and traffic are likely to be most important). The Lambeth Biodiversity Action Plan (BAP) identifies gardens as a priority habitat for the borough and does not differentiate between, rear, front, side or corner gardens. The London BAP also identifies private gardens as priority biodiversity habitat. In the interests of SA Objective 10, it is considered that cycle storage areas should not compromise biodiversity of front gardens, in addition to the visual amenity. It is further considered this better aligns with policy Q14 – development in gardens which takes account of biodiversity values.
- 5C10.26 Overall it is considered that policy Q14 on development in gardens and on backland sites should result in positive effects on SA Objective 10. Previous SA recommendations have been taken on board so that proposals will be resisted that result in loss of biodiversity, soft landscaping/permeable drainage or openness. This amendment results in significant positive effects on the objective.

5C10.27 Policies Q21 and 24 should result in positive effects for SA Objective 10. Policy 24 seeks to protect undesignated heritage assets. The Local Landscape Register will list designated spaces and landscapes, and a number of churchyards and gardens are proposed for inclusion, and these are likely to have significant biodiversity value. Supporting text has been improved in light of SA recommendation so that all features (including natural / ecological) of interest are sustained or enhanced, rather than just built features.

5C10.28 It should be noted that living roofs can improve roofscape views (policy Q25)

Places and Neighbourhoods policies PN1 – PN11

5C10.29 Overall it is considered that the places and neighbourhood policies should not result in significant adverse impacts on biodiversity. The policies generally seek to intensify landuse in established town centres through mixed use development schemes and also provide public realm improvements. All the major centres (Waterloo, Vauxhall, Brixton and Streatham) seek to improve the quality of publicly accessible green spaces and create new green spaces (pocket parks) and connect and improve existing green spaces where possible. Streatham and West Norwood policies specifically state that open space appropriate to the nature and scale of development will be sought. Given that most centres will be seeing significant regeneration / rebuilding, it may be appropriate for these policies to promote living roofs and walls. This will not only bring biodiversity benefits, but also improve local air quality. As most of the town centre policies seek to promote sustainable transport, public realm improvements, and reduce impact of road traffic; it is considered appropriate to further encourage living walls and roofs in town centre developments, particularly the major centres. In previous SA work it was suggested that living roofs and walls are specifically mentioned in these policies, however it was felt by the Council that living roofs and walls are appropriately accounted for in policy EN4 and need to repeating in this section of the Plan.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C10.30 All sites in Table 39 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 10.

Table 38: Significance criteria for SA Objective 10: Biodiversity

| Positive | Negative |
|---|---|
| <ul style="list-style-type: none"> • Doesn't impact upon any site of nature conservation importance or LBAP species/habitat. • Improves people's access to nature. • Overall net gain for biodiversity | <ul style="list-style-type: none"> • *Site contains a nationally/internationally designated site (SSSI, SPA, SAC or Ramsar site) or Site of Metropolitan Importance • Impacts on a site of nature conservation importance or LBAP species/habitat. • Increases areas of nature conservation deficiency. |

* Indicates high level constraint

TABLE 39: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 10: BIODIVERSITY

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|----|--|--|--|---|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | - Doesn't impact directly upon any site of nature conservation importance or LBAP species/habitat although the part of the site that is vacant will need to be checked for species presence. | - site development may impact on Archbishop park to the south | Compliance with legislation protecting species and habitats and local plan policies |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat. | - vacant building on site may be accommodating bats – surveys will be required | Compliance with legislation protecting species and habitats and local plan policies |
| 3 | Vale Street Depot, Vale Street SE27 | - site does not directly impact upon any site of nature conservation importance however the site abuts SINC 21 - West Norwood Cemetery | | Compliance with legislation protecting species and habitats and local plan policies |
| 4 | New Park Road SW2 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |
| 5 | Elizabeth House, York Road SE1 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat. - improves peoples access to open space | | |
| 6 | Shell Centre, 2-8 York Road SE1 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |
| 7 | Waterloo Station, Waterloo Road SE1 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |

| | | | | |
|----|---|--|---|--|
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat - allocation design consideration includes linking new urban square, linear park and Vauxhall Park, improving accessibility | | |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat - allocation design consideration includes linkages to new open spaces and to the east of the viaducts to Vauxhall Park, improving accessibility | - loss of temporary open space (although this isn't particularly useable) | |
| 14 | Somerleyton Road SW9 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat - allocation provides provision for open space - plane trees on grass verge at northern end of Somerleyton Road and Coldharbour Lane frontage protected | | |
| 15 | Popes Road SW9 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |
| 16 | Brixton Central (between the viaducts) SW9 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |
| 17 | 'Your New Town Hall' SW2 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |
| 18 | 286 - 362 Norwood Road SE27 | - Doesn't impact upon any site of nature conservation importance or LBAP species/habitat | | |

5C10.31 As demonstrated above, no sites directly impact on any site of nature conservation importance. While many of the allocations make provision for new public squares and public realm improvements; it is considered that these sites could more effectively promote biodiversity despite their urban environments. Use of living walls and roofs or landscaping that promotes biodiversity would help bring increased greenery to the sites and provide biodiversity, health and improved air quality benefits. Previous SA work highlighted this concern and allocations have since been reviewed by the Council. Provision for living roofs, where possible, has been included for Site 14 Somerleyton Road. More positive effects would result for local biodiversity, health and climate change if more sites specified in the allocations that living roofs and walls are expected. However, it is recognised that policy EN4 applies to all developments.

Summary of Local Plan policies and site allocations

5C10.32 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan policies and site allocations will have a significant positive effect on maintaining and enhancing existing baseline conditions on biodiversity. It is considered that the Local Plan seeks to conserve and enhance biodiversity, and bring nature closer to people while improving access to these areas where possible.

Table 40: Summary assessment of effects of Local Plan on biodiversity

| Assessment of effects of the Local Plan on SA objective 10 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|---|-------|---|--|---|
| To conserve and enhance biodiversity and to bring nature closer to people | ++ | <p>Taking into account existing baseline conditions of biodiversity, it is considered that the Local Plan generally provides well for SA objective 10 and significant positive effects are anticipated. Previous SA recommendations to policy have been incorporated to: recognise the importance gardens have for the Boroughs biodiversity; clarify that biodiversity generally is protected rather than identified areas with biodiversity status; and tweaks to policy have been made to strengthen biodiversity protection and enhancement.</p> <p>No site allocations directly impact on sites of conservation value or protected species or habitats. Site allocations will need to comply with Local Plan policies including EN4 for living roofs and walls.</p> <p>There is potential for positive cumulative effects on biodiversity in the predominately urban existing environment, as policies EN1, Q9, Q14, PN2 and site allocations (for example Vauxhall ones) promote creation of new habitats and creating better connections between spaces. Existing open space areas are protected and as a result of previous SA recommendations; proposals will now be resisted that result in loss of biodiversity.</p> <p>The Habitat Regulations Assessment – Screening Report concluded that the Local Plan will not result in any likely significant adverse effects on any European Site. Similarly, it found the Local Plan will not have an adverse impact on the integrity of the four Natura 2000 sites. Therefore, the Appropriate Assessment stage is not required on the Local Plan for Lambeth Borough. Natural England in their representation agreed with these conclusions.</p> | <p>The open space network is already protected, so this is already evident and will remain evident for the entire plan period.</p> <p>Biodiversity enhancement will begin to be evident in the short term as some development occurs. Increased improvements and restoration are likely in the short-medium term.</p> <p>New areas of useable open space will likely be evident in the medium to long terms as developments and public realm projects are completed.</p> <p>Construction effects may temporarily affect biodiversity in some locations (for example reuse of vacant buildings); however the law requires developers not to intentionally injure, capture or kill protected species such as bats or damage or destroy habitat such as bat roosts. It is considered that ecological surveys and advice from qualified ecologist can avoid or mitigate adverse effects on protected species / habitat. Any loss of brownfield habitat can be recreated in the form of a brown roof.</p> | <p>Permanent</p> <p>Any effects associated with construction are likely to be minimised through mitigation measures and are likely to be temporary in nature.</p> |

Recommendations for monitoring likely significant effects

5C10.33 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § Percentage of development planning approvals that have incorporated new biodiverse open space
- § Percentage of development planning approvals that have incorporated green infrastructure (which includes SUDs, green roofs, living walls)
- § The achievement of BAP targets
- § The change in area and condition of BAP habitats/species
- § The change in area and percentage in positive conservation management of Sites of Importance for Nature Conservation
- § Percentage of population located in an access to nature deficiency area.

5C11. CLIMATE CHANGE AND ENERGY

5C11.1 This section of the SA relates to the sustainability performance of the Local Plan against:

Objective 11: Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.

5C11.2 To achieve this objective, plan policies should seek to reduce emissions of greenhouse gases by reducing energy consumption; increase the proportion of energy both produced and used from renewable and sustainable resources; reduce the impacts of climate change (e.g. urban heat island effects, flooding, drought); ensure adaptation to the future impacts of climate change; ensure that new and retrofitted development and infrastructure is located, designed and constructed to withstand the effects of climate change over its design life; promote high quality, appropriate design and sustainable construction methods in all types of building, including new build and retrofit; promote the highest standards of energy and environmental performance for new and existing buildings and; minimise embedded carbon in new buildings and development.

Relevant policy objectives

National Level

5C11.3 *The National Planning Policy Framework 2012* states that planning plays a key role to helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.

5C11.4 The *Climate Change Act 2008* imposes a duty on the Government to ensure net carbon emissions in the UK are at least 80% lower than 1990 levels by 2050, and to set a 'carbon budget' limiting net carbon emission for each period of five years (budgets for 2008-2022 have already been set).

Regional Level

5C11.5 The *London Plan (2011)* seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 percent (below 1990 levels) by 2025 and sets out guidance as to the various ways to reduce emissions, and cover the whole development process from construction to energy use of the building.

5C11.6 *Delivering London's Energy Future: the Mayor's climate change mitigation and energy strategy, 2011* focuses on reducing CO₂ emissions to mitigate climate change, securing a low carbon energy supply for London, and moving London to a thriving low carbon capital.

Baseline conditions and existing issues

5C11.7 Lambeth's total CO₂ emissions that are within the scope of influence of the Local Authority (previously NI 186) was 1290.4 kilotonnes CO₂ for 2009 according to the Department of Energy and Climate Change. Industry and commercial uses accounted for 39%, domestic accounted for 41% and the remaining 20% was attributed to road transport. Lambeth has achieved a 12% per capita reduction in emissions since 2005 (Department of Energy and Climate Change).

5C11.8 The most recent government figures, from 2008, estimate that 11.5% of Lambeth residents are in fuel poverty, however the real figure is likely considerably higher due to the rises in fuel prices since 2008. Price rises in Lambeth are likely to be in line with the rest of London. Therefore it is possible that the level of fuel poverty in Lambeth in 2011 is around 19.5% (Fuel Poverty Strategy 2011). Figure 6 shows the percentage of households in fuel poverty.

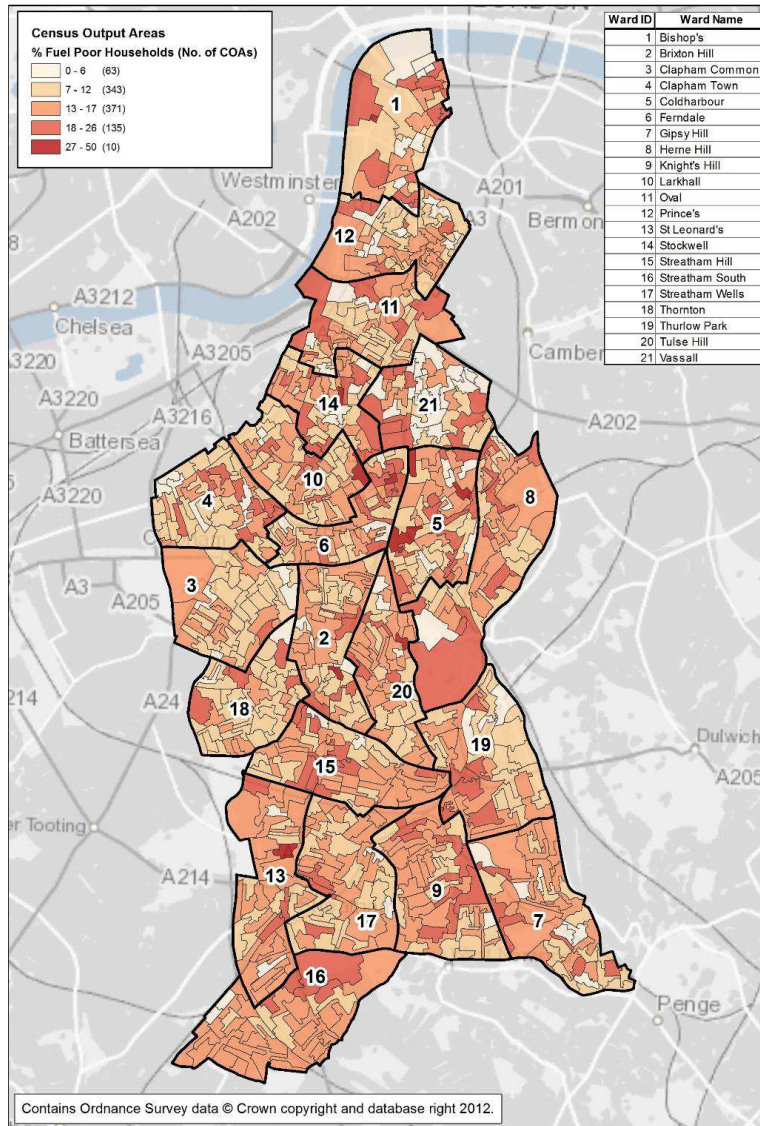


Figure 6: Percentage of households in fuel poverty

Likely evolution without the Plan

- 5C11.9 Carbon emissions are likely to rise with increasing development and could be exacerbated by proposed levels of growth if not managed in an appropriate way. Climate change could have severe ramifications for London and Lambeth's populations, economy, wildlife, cultural heritage and materials assets.
- 5C11.10 There is an increasing demand for use of energy arising from population growth and increased economic activity. Intervention is needed to make more efficient use of energy including placing requirements on new developments and finding ways to

improve the efficiency of existing buildings. There is a need to increase the proportion of energy from renewable sources and achieving this through new development is a major opportunity.

Assessment of Policies

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

5C11.12 The following policies have been screened as having potential for significant effects on this objective.

| | |
|---|---|
| D1 – Delivery and monitoring | EN2 – Local food growing and production |
| D2 – Presumption in favour of sustainable development | EN3 – Low carbon and energy |
| D3 – Infrastructure | EN4 – Sustainable design and construction |
| D4 – Planning obligations | EN5 – Flood risk |
| D5 - Enforcement | Q9 – Landscaping |
| H1 – Maximising housing delivery | Q10 - Trees |
| H5 – Housing standards | Q14 – Development in gardens |
| ED1 – Key Industrial and Business Areas (KIBAs) | Q20 – Statutory listed buildings |
| T1 – Sustainable travel | PN1 – Waterloo |
| T2 – Walking | PN2 – Vauxhall |
| T3 – Cycling | PN3 – Brixton |
| T4 – Public transport infrastructure | PN4 – Streatham |
| T5 – River transport | PN5 – Clapham |
| T6 – Assessing impacts of development on transport capacity | PN6 – Stockwell |
| T7 - Parking | PN7 – West Norwood |
| T8 - Servicing | PN8 – Kennington / Oval |
| EN1 – Open space | PN9 - Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and monitoring policies

5C11.13 Section 106 planning obligations funds may be used for low carbon and renewable energy to mitigate impacts of development and therefore is likely to have significant positive effects for addressing climate change.

Housing policies H1, H5

5C11.14 The London Plan requires the delivery of at least 11,950 additional dwelling in Lambeth from 2011-2021 and this requirement is provided for in these policies. This level of growth is likely to result in increased greenhouse gas emissions, and a significant negative effect on this objective. It is noted that the London Plan Integrated Impact Assessment (2009) recognised that predicted population increase and new housing numbers over the plan period may result in an aggregated increase in CO₂ emissions. It is also noted that the Assessment concluded that in combination, policies in the London Plan 'are likely to progressively reduce the CO₂ emissions from residential dwellings during the course of the Plan' and that 'the progressive reduction of CO₂ emissions from residential dwellings and non residential buildings is likely to result in a positive contribution in comparison with the existing trend...which indicates that emissions are declining by 1 to 2% annually'. Within Lambeth, it is considered that that increased emissions from the new housing can be mitigated through high standards of energy efficient design and construction (including Code for Sustainable Homes); district heat networks and patterns of development that reduce the need of private vehicle transport. There are

uncertainties around whether their effects can be mitigated completely. These lie with the delivery of district heat networks, and the level of obligation on developers (and indeed feasibility) to exceed carbon reduction targets, without adversely affecting developer interest in the Borough. Uncertainty also arises from delivery of high Code for Sustainable Homes and BREEAM standards as such standards are only required unless it is not technically feasible or viable to do so.

Economic development policy ED1

5C11.15 Policy ED1 states that Key Industrial Business Areas (KIBAs) may only be used for business, industrial, storage and waste management uses, including green industries which contribute to achieving a low carbon economy or renewable technologies. There are currently 28 KIBAs in the Borough, as well as other sites outside of designated KIBAs in business use. While industry is a large contributor of carbon emissions (around 39% of all emissions), proliferation of green industries (including research and development) in the Boroughs KIBAs will help combat climate change and emissions from all activities (residential, transport, commercial). This may contribute positively towards the objective.

5C11.16 The economic development policies (ED1 – ED6) generally seek to retain employment generating sites, and create new jobs and commercial activities in the Borough. While such growth is likely to contribute to greenhouse gas emissions, these policies in themselves are likely to have a neutral effects. This is because areas earmarked for increased economic activity, such as Vauxhall and Waterloo encourage mixed use development and are located near to existing major public transport hubs, thereby reducing the likelihood of private vehicle use and the need to travel. Business use sites outside of KIBAs also allow for mixed use developments, and redevelopment to solely residential use is permitted subject to criteria related to marketing. Again, this reduces the likelihood of private car use. In addition, possible negative effects of growth are mitigated by other policies within the Plan, for example highest standards of energy efficiency and design, district heat networks, increased greenery and green infrastructure.

Transport policies T1 – T8

5C11.17 The transport policies seek to promote sustainable travel, particularly active travel through improving environments for walking and cycling. Policy T1 states the Council promotes sustainable patterns of development, minimising the need to travel and reducing dependence on the private car. If implemented rigorously and consistently clause (a) of policy T1 may address the concerns highlighted above for new housing to be located in sustainable locations (near public transport and everyday services and facilities). With reference to reducing carbon emissions, it is considered that electric charging points should be encouraged in new developments, and therefore electric vehicles and/or charging points should be supported in the Local Plan, even if within supporting text of policy T1 or T6.

5C11.18 Overall, it is considered that the transport policies are likely to result in significant positive effects on the achievement of SA Objective 11 in terms of reducing and managing emissions arising from transportation, particularly given the level of growth required in the Borough through London Plan obligations associated with housing and Opportunity Areas.

SA Recommendation: The Local Plan should at least make mention for support of electric vehicles and/or electric vehicle charging points. Ideally a network of charging points should be provided across the borough.

Council Response: Reference to electric vehicles has been included in para 2.76.

- 5C11.19 The Local Plan contains good policy on protecting open spaces and providing additional public open space provision in areas deficient of open space. Green spaces help remove carbon dioxide from the atmosphere, and therefore, provided the management of green spaces does not create carbon that exceeds the level vegetation can remove; the protection and enhancement of open spaces in terms of reducing heat island effect and reducing impacts of climate change is commendable. Previous SA recommendations to increase biodiversity in the borough have been incorporated into the Plan, therefore making a more positive contribution towards SA Objective 11.
- 5C11.20 Policy EN2 on food growing areas also contributes positive effects to SA Objective 11 and previous SA recommendation to encourage food growing on appropriate non-residential development further enhances effects towards attaining SA Objective 11.
- 5C11.21 A significant policy in the attainment of SA Objective 11 is Policy EN3 on low carbon and renewable energy. The policy seeks to meet London Plan requirements. In response to previous SA concerns the policy has been strengthened, particularly in terms of decentralised heating networks. However it is considered that all developments should make provision to enable connection to any future decentralised energy network, rather than any *planned* future network. The Council may wish to remove the word 'planned' from policy EN3(d) or amend the third sentence as follows: Where networks do not currently exist, developments should make provision to enable connection to any future decentralised energy network...'
- 5C11.22 The revised policy is likely to result in greater carbon reductions and more significant positive effects on SA Objective 11. Green technology and sustainable design and construction is a rapidly evolving field and in the plan period, it is likely the costs associated with green technologies will reduce, particularly as more zero-carbon developments are delivered in line with Government policy. There is some uncertainty in the delivery of district heat networks, particularly in identifying Energy Centres, for example in the Vauxhall Opportunity Area northern cluster.
- 5C11.23 Policy EN4 provides for sustainable design and construction, and previous SA recommendations associated with higher standards for Code for Sustainable Homes and BREEAM significantly improve the likelihood of more positive effects in terms of SA Objective 11. This is critical for minimising energy consumption and reducing greenhouse gases given the level of growth proposed for the borough, including at least 17925 new dwellings over next 15 years). The policy supports living roofs and walls. A layer of vegetation can reduce heat loss from buildings, cutting the wind chill factor by 75 per cent and heating demand by 25 per cent (Cambridge University 2012). Living walls and green roofs provide environmental benefits which can save money in heating and cooling costs and minimise energy consumption, while extending the lifespan of roof membranes and heating, ventilation and air conditioning equipment. Living roofs and walls contribute to carbon sequestration, and are also effective climate change adaptation measures which are required under clause (d) of the policy. Accordingly in terms in SA Objective 11, it is considered that living roofs and walls should be provided in all development proposals.
- 5C11.24 Overall, and taking into account the level of growth proposed for the borough (in line with London Plan targets), it is considered that policy EN4 should result in positive effects in terms of minimising energy consumption, reducing greenhouse gases and preparing the borough for the unavoidable effects of climate change. Importantly, the policy requires higher standards than the building regulations in terms of carbon reduction targets. The achievement of significant positive effects from policy EN4 is dependent on deliverability of energy efficient design and construction (i.e. low U-

values and air permeability rates), low carbon technology and the extent of adaptation measures implemented, and would likely vary from one scheme to another. Detailed guidance will be provided in an updated SPD for Sustainable Design and Construction, which should help maximise positive effects.

- 5C11.25 It is considered that policy EN5 on flood risk has a significant positive effect on this objectives (particularly in terms of climate change adaptation). It appropriately addresses and minimises effects on developments of flood risk, including impacts arising from future climate change. It is noted that the Environment Agency agrees with this statement, as outlined in their representation on the draft Local Plan and Sustainability Appraisal, dated 25 April 2013.

SA Recommendation: more positive effects would likely result if all developments made provision to enable the later connection to any future decentralised energy network, rather than limit connection requirements to those developments in areas planned for future networks.

Council Response: The current wording seems to be more consistent with the GLA guidance on preparing energy assessments and the Mayor's draft SPD. Its not considered reasonable to require developments to make provision to connect to a network if there are no current plans for one in the vicinity of the site. Para. 9.19 sets out a less onerous requirement where there is no planned network.

Quality of built environment policies Q9, Q10, Q14, Q20, Q22

- 5C11.26 Improvements to policies Q9 landscaping and Q10 trees in response to previous SA recommendations should result in more positive effects on reducing greenhouse gases and provision of climate change adaptation measures, particularly given the amount of growth expected in the Borough over the plan period. New tree planting and other greenery helps reduce the heat island effect, provide shading, cool ambient air temperatures and improve air quality through filtering particulates which all help achieve SA Objective 11.
- 5C11.27 Achieving improved energy efficiency in listed buildings and within conservation areas may be challenging and costly. Certain types of glazing, solid wall insulation and low and zero carbon micro-generation technologies may be less suitable or more expensive to install. Paragraph 10.73 of the supporting text to policy Q20 states that glazing for window replacements of listed building should be single glazing with a putty finish in the traditional manner. This will likely limit the extent of energy efficiency achievable in such buildings. However, older buildings are not necessarily less energy efficient. Many historic buildings perform well in terms of energy efficiency. Thick walls and small windows of many vernacular buildings provide them with a high thermal mass that keeps them warmer in winter and cooler in summer, while terraces can be more energy-efficient than some detached houses because of their smaller surface area. In a hotter climate, the natural ventilation, high ceilings and generous proportions of many historic buildings may also make energy-intensive air conditioning less necessary than in more recent structures (English Heritage 2008).
- 5C11.28 Similarly, it should be acknowledged that historic buildings represent a significant past investment of energy and materials. Demolition and replacement means not only losing all of the resources embodied in the original building, but also the investment of yet more energy for demolition, the creation and delivery of new construction materials, the building process itself, and the disposal of the

consequential waste, resulting in increased carbon emissions and quantities of waste.

- 5C11.29 To increase energy efficiency of heritage assets it may be appropriate for heritage assets to link to district network schemes as this could alleviate some of the need for more immediate impacts on heritage assets such as the installation of micro-renewable technologies. The protection of settings of listed buildings (often generous green spaces) also provides climate change mitigation and adaptation responses.

SA recommendation: It is recommended that guidance on climate change mitigation and adaptation in relation to heritage assets is provided in the proposed SPD for listed buildings and there is at least reference to this and climate change in the supporting text of heritage policies.

Council Response: Noted. This will be included as part of documents produced under policy Q18 – Historic Environment Strategy.

Places and neighbourhoods policies

- 5C11.30 The policy for Waterloo includes further development that supports its role as an international centre, major location for its London wide role for offices, hotels etc and its role for the local and wider economy. A new district centre is proposed for Vauxhall and significant growth is earmarked for the area. In response to previous SA recommendation, support for the implementation of VNEB Energy masterplan is now included in the policy and development will be required to implement and connect to district heating networks accordingly. This should help mitigate against the effects on climate change, energy consumption and air quality particularly given the level of growth proposed. CHP/CCHP plant heating networks are proposed for Brixton which should result in reduced carbon emissions, reduced levels of fuel poverty and increased energy efficiency relative to growth proposed.
- 5C11.31 Such development as that proposed under policies PN1 – PN4 and PN 7 will inevitably result in increased energy consumption and greenhouse gas emissions and therefore a significant negative effect on this objective. There are a number of ways in which this effect is mitigated. Much significant development in the borough is proposed within existing town centres which promote mixed use development, aim to reduce the need to travel, and maximise and enhance public transport accessibility and environments for active travel. The policy for Stockwell specifically makes provision for reducing carbon emissions and adapting to climate change, and local energy efficiency initiatives will be sought for developments in Loughborough Junction. Policy PN7 for West Norwood Town Centre seeks to explore the potential for a local energy network. Consideration of energy is required by other Local Plan policies anyway (EN3, EN4) however by specifically making mention of climate change in some PN policies and not others; it may inadvertently suggest that energy networks are more appropriate or favoured in some areas over others (and consequently that these other areas may not need to consider low carbon technologies / energy networks – for example Waterloo, Clapham, Streatham). This anomaly was previously highlighted as a concern in the SA on the draft Local Plan; and the policy response was that as low carbon and renewable energy is addressed in policies EN3 and EN4 it is not necessary to repeat the content of these policies in every place specific policy.
- 5C11.32 Policies PN4 Streatham and PN7 West Norwood seek car parking appropriate to the nature and scale of development. While this acknowledges particularly issues with car parking in these town centres, for the purposes of SA Objective 11 and reducing

greenhouse gas emissions; this is not helpful. It is recognised that the car parking sought is not in excess of the maximum levels set out in T7 (i.e. London Plan maximum parking standards). Nonetheless, the effect of this reference in the policies will likely encourage car use and result in increased carbon emissions and therefore be contrary to SA Objective 11. This might be a good opportunity to make provision/mention electric charging points to help offset carbon emissions.

- 5C11.33 The Council may wish to seek higher sustainable design and construction standards in strategic sites (e.g. Vauxhall) particularly where district heating networks are proposed or where significant development is occurring unless it can be demonstrated it would not be technically feasible or financially viable to achieve the higher standards.

SA Recommendation: Some places and neighbourhoods policies refer to provision of CHP / district heat networks / energy efficiency measures (for example, Vauxhall, Brixton, West Norwood, Stockwell, Loughborough Junction) whereas some do not (Waterloo, Clapham, Streatham). It is acknowledged that policies EN3 and EN4 apply to all development. The Council should review whether some places policies inadvertently suggest that energy networks are more appropriate or favoured in some areas over others (and consequently that these other areas may not need to consider low carbon technologies / energy networks).

Council Response: Reference is made to the emerging proposals for development of a South Bank Decentralised Energy Network in the Waterloo policy supporting text. In addition, connection to district heat networks has been included in relevant site allocations (in response to previous SA recommendations). In other places and neighbourhoods, such as Clapham and Streatham there are not as yet any identified opportunities for district heating networks

SA Recommendation: consider making reference to electric vehicle charging points in the policies particularly those seeking additional town centre car parking.

Council Response: Noted, reference to electric vehicles has been included in section 2 of the Local Plan (para 2.76).

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C11.34 All sites in Table 42 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 11.

Table 41: Significance criteria for SA Objective 11: Climate Change and Energy

| Positive | Negative |
|--|--|
| <ul style="list-style-type: none"> • Contributes to 'low carbon living' or promotes opportunities for retrofitting. • Reduces carbon and other GHG emissions. • Promotes high standards of sustainable design and construction, including opportunities for linked trips. • Promotes renewable energy generation and use. • Promotes decentralised energy. • Addresses climate change adaptation issues. | <ul style="list-style-type: none"> • Increased carbon and other GHG emissions result from: <ul style="list-style-type: none"> • Increased traffic and transport; • Increased housing and built development • Industry • IF measures not included to reduce and minimise emissions and use appropriate methods of low carbon construction, design and operation. • Fails to address or potentially worsens risk from climate change events. |

TABLE 42: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 11: CLIMATE CHANGE

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|---|---|--|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | | <ul style="list-style-type: none"> - Increased housing and new build development proposed, therefore increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | <ul style="list-style-type: none"> - promotes sustainable transport through a school travel plan | <ul style="list-style-type: none"> - new build development for new school, therefore increased carbon emissions and GHG emissions - potential increase in emissions and air quality issues from vehicles associated with school drop off and pick up - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 3 | Vale Street Depot, Vale Street SE27 | <ul style="list-style-type: none"> - promotes sustainable transport through a school travel plan | <ul style="list-style-type: none"> - new build development for new school, or housing therefore increased carbon emissions and GHG emissions - potential increase in emissions and air quality issues from vehicles associated with school drop off and pick up - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> - promotes sustainable transport through a school travel plan | <ul style="list-style-type: none"> - new build development for new school, or housing therefore increased carbon emissions and GHG emissions - potential increase in emissions and air quality issues from vehicles associated with school drop off and pick up - carbon reduction measures and climate change adaptation measures not provided as key development | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |

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| | | | consideration and design principles | |
|----|--|--|---|--|
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> - improvements to public realm to encourage walking and access to Waterloo Station - allows for potential connection to district heat network | <ul style="list-style-type: none"> - new build development including offices and residential resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 6 | Shell Centre, 2-8 York Road SE1 | <ul style="list-style-type: none"> - improvements to public realm to encourage walking and access to Waterloo Station - allows for potential connection to district heat network | <ul style="list-style-type: none"> - new build development including mixed use development (offices, leisure, residential) resulting in increased carbon emissions and GHG emissions | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 7 | Waterloo Station, Waterloo Road SE1 | <ul style="list-style-type: none"> - opportunity for retrofitting - increases public transport capacity and accessibility / interchanges - improvements to encourage more walking - allows for potential connection to district heat network | <ul style="list-style-type: none"> - new build potential would increase carbon emissions and GHG emissions | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | <ul style="list-style-type: none"> - improvements for cyclists and pedestrians - allows for potential connection to district heat network | <ul style="list-style-type: none"> - new build development including offices and residential resulting in increased carbon emissions and GHG emissions | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | <ul style="list-style-type: none"> - opportunity for retrofitting - improvements to public realm to encourage walking in surrounding area including access to nearby Waterloo Station - allows for potential connection to district heat network | | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | <ul style="list-style-type: none"> - opportunity for retrofitting - allows for potential connection to district heat network | <ul style="list-style-type: none"> - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |

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| | | | | |
|----|---|--|--|--|
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | <ul style="list-style-type: none"> - dual aspect residential units in blocks - public realm improvements for cyclists and pedestrians - allows for potential connection to district heat network | <ul style="list-style-type: none"> - new build development for new school, and mixed use development (residential and employment) therefore increased carbon emissions and GHG emissions - potential increase in emissions and air quality issues from vehicles associated with school drop off and pick up | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | <ul style="list-style-type: none"> - retains listed building fronting Wandsworth Road – possible opportunity for refurbishment - dual aspect residential units in blocks - public realm improvements for cyclists and pedestrians - allows for potential connection to district heat network | <ul style="list-style-type: none"> - new build mixed use development including employment, community and residential resulting in increased carbon emissions and GHG emissions | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | <ul style="list-style-type: none"> - public realm improvements for cyclists and pedestrians - allows for potential connection to district heat network | <ul style="list-style-type: none"> - new build mixed use development including employment, community and residential resulting in increased carbon emissions and GHG emissions | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |
| 14 | Somerleyton Road SW9 | <ul style="list-style-type: none"> - retention of line of plane trees on grass verge - possible opportunity for refurbishment of Carlton Mansions - new dwellings to be dual aspect - living roof promoted - allows for potential connection to district heat network | <ul style="list-style-type: none"> - new build mixed use development including employment, community and residential resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles - provision of new open space – unclear if this will be green | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Brixton policy PN3 seeks to implement town centre energy and waste management strategies including CHP/CCHP plant heating networks - Site specific flood risk assessment has been carried out as part of SRFA |
| 15 | Popes Road SW9 | <ul style="list-style-type: none"> - dual aspect residential units | <ul style="list-style-type: none"> - new build mixed use development including employment, community and residential and cycle and car parking resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not | <ul style="list-style-type: none"> - compliance with Local Plan policies, in particular EN3 and EN4 - Brixton policy PN3 seeks to implement town centre energy and waste management strategies including CHP/CCHP plant heating networks |

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| | | | provided as key development consideration and design principles - promotes increased traffic (car parking) | - Site specific flood risk assessment has been carried out as part of SRFA |
| 16 | Brixton Central (between the viaducts) SW9 | | - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles - new development increases carbon emissions and GHG emissions | - compliance with Local Plan policies, in particular EN3 and EN4 - Brixton policy PN3 seeks to implement town centre energy and waste management strategies including CHP/CCHP plant heating networks - Site specific flood risk assessment has been carried out as part of SRFA |
| 17 | 'Your New Town Hall' SW2 | - opportunity for refurbishment | - new build mixed use development including civic, employment, community and residential resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles - provision of new open space – unclear if this will be green | - compliance with Local Plan policies, in particular EN3 and EN4 - Brixton policy PN3 seeks to implement town centre energy and waste management strategies including CHP/CCHP plant heating networks - Site specific flood risk assessment has been carried out as part of SRFA |
| 18 | 286 - 362 Norwood Road SE27 | - makes provision for a CCHP local energy network within the development therefore promotes low carbon living, and reduces carbon emissions | - new build mixed use development including supermarket, community and residential, business and car parking resulting in increased carbon emissions and GHG emissions - carbon reduction measures and climate change adaptation measures not provided as key development consideration and design principles - promotes increased traffic (car parking) | - compliance with Local Plan policies, in particular EN3 and EN4 - Site specific flood risk assessment has been carried out as part of SRFA |

5C11.35 Previous SA recommendations for Site Allocations have been taken on board so that appropriate sites now recognise/require district heat networks and/or connections on their site (i.e. all Waterloo and Vauxhall sites will be expected to connect to district heat networks in these areas).

Summary of Local Plan policies and site allocations

5C11.36 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, and the housing growth requirements on the Borough set out in the London Plan, it is possible that the Local Plan could have a positive effect on reducing greenhouse gas emissions relative to the growth imposed, and there are likely to be improvements to the Borough's ability to adapt to climate change. Implementation of these policies will ensure that new developments are also likely to be better adapted to the predicted changes in climate through sustainable design, as well as higher levels of resource efficiency.

Table 43: Summary assessment of effects of Local Plan on climate change

| Assessment of effects of the Local Plan on SA objective 11 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|--|-------|---|--|---|
| Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change. | +/? | <p>It is accepted that there is likely to be increases in greenhouse gas emissions associated with the levels of growth projected for the Borough. However, the additional housing is required by the London Plan, and its overall impact has been appraised in the Integrated Impact Assessment (2009) of that Plan. Critically, this concluded London Plan policies in combination are 'likely to progressively reduce CO₂ emissions from residential dwellings during the course of the Plan and this is anticipated to positively contribute to the [climate change] objective in comparison with the existing trend'. The current trend is downward movement of around 1-2% per annum.</p> <p>Taking into account growth required by the London Plan, review of Lambeth Local Plan policies concludes that there is a possible positive impact on this objective through policies which act to minimise energy consumption and reduce carbon emissions through development. Examples of these are district heat networks, more energy efficient design and construction, living roofs and walls, encouraging mixed use developments near public transport hubs, and improvements for facilitating active travel.</p> <p>A number of improvements have been made since previous iterations of the Plan which improve the performance of the Plan against this objective. For example these include higher standards of Code for Sustainable Home and BREEAM requirements, provision for residential above ground floor in town centres, increased tree planting and greenery in developments.</p> <p>Uncertainties lie with the delivery of district heat networks, and the level of obligation on developers (and indeed feasibility) to exceed carbon reduction targets, without adversely affecting developer interest in the Borough. Uncertainty also arises from delivery of high Code for Sustainable Homes and BREEAM standards as such standards are only required unless it is not technically feasible or viable to do so. However, from 2013 – 2016 buildings need to achieve 40% reductions in CO₂ emissions on building regulations in line with London Plan, after which zero carbon development</p> | <p>The impact of reduced greenhouse gas emissions will be achieved over the long-term. The probability of this occurring is dependent on the delivery of a public transport improvements, delivery of sustainable building and design standards (i.e. high Code for Sustainable Homes and BREEAM standards); delivery of district heating networks and other developments being linked into them and the technical and financial viability of installing small scale renewable energy or low carbon technologies. In the short –term, particularly as the economy recovers from the recession, developers may claim that high sustainability standards are not technically feasible or viable.</p> | <p>Temporary increases in emissions may result as a consequence of demolition and new construction.</p> <p>In other respects effects of reduced greenhouse gas emissions are considered to be permanent with respect to regulated emissions given the number of Local Plan policies that either directly or indirectly seek to reduce greenhouse gas emissions.</p> |

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

- 5C11.37 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:
- § Number of buildings built to Code for Sustainable Homes Level 4 and BREEAM excellent
 - § Number of DHNs in the Borough and dwellings/premises linked to them.

5C12. WATER RESOURCES AND FLOOD RISK MANAGEMENT

5C12.1 This section of the SA relates to the sustainability performance of the Local Plan against:

Objective 12: To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.

5C12.2 To achieve this objective, plan policies should improve the quality of water and waterbodies; reduce piped water consumption e.g. through reducing demand and encouraging recycling in households; reduce waste water and sewage needing processing; support sustainable urban drainage and; minimise the risk of all types of flooding (tidal, fluvial, surface water and sewerage) to people and property and manage flood risks appropriately both now and in the long-term.

Relevant policy objectives

National Level

5C12.3 Paragraphs 100 – 104 of the *National Planning Policy Framework 2012* relate to flood risk. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should apply a sequential, risk-based approach to the location of development to avoid possible flood risk to people and property and manage any residual risk.

Flood and Water Management Act 2010 requires boroughs to investigate (by 2015) and address flood risk problems and maintain a public register of Flood Risk Management assets. Boroughs are Lead Local Flood Authorities (LLFAs) and have full responsibility for managing flood risk from surface water, groundwater and ordinary watercourses.

Regional Level

5C12.4 *London Regional Flood Risk Appraisal – October 2009* recognises that some Opportunity Areas and Intensification Areas are within known flood zones, and that alternative sites for large scale development within London do not exist without encroaching into Green Belt, MOL or other protected spaces. To meet housing targets, consideration will need to be given to development of brownfield flood zone 3a. The sequential test permits the consideration of these sites for development. It will still be necessary for boroughs and developers to apply the sequential test locally and consider flood risk assessments at a more detailed level when allocating uses or applying for planning permission. It will still remain important to place more vulnerable uses in areas with lower flood risk in order to meet the Sequential Test at a local level.

5C12.5 *London Plan (2011)* policy 5.12 addresses flood risk management. The policy requires flood risk assessment and management requirements as set out in PPS 25, and development should have regard to TE2100 and catchment management plans. Policies 5.13 to 5.15 address matters such as sustainable urban drainage systems (including a drainage hierarchy), water quality and wastewater infrastructure, and water use and supplies.

5C12.6 *Thames Estuary 2100 (TE2100)* is a long term flood risk management plan for London and the Thames estuary. It sets out the strategic direction for managing flood risk in discrete policy areas across the estuary, and contains recommendations on what actions the Environment Agency and others will need to take in the short (next 25 years), medium (the following 40 years) and long term (to the end of the century). Lambeth falls within Action Zone 2 – Central London, of the TE2100 Action Plan.

Local Level

5C12.7 The Strategic Flood Risk Assessment 2012 also identifies spatial variation in flood risk from fluvial and surface water flooding. It contains guidance for developments in flood risk areas as well as hazard and depth maps. Maps divide the borough into zones on the basis of the probability of flooding occurring, ignoring the presence of any flood defences / alleviation measures. Areas identified in the SFRA as at highest risk of fluvial and tidal flooding in Lambeth are Waterloo, Vauxhall and adjacent to the River Graveney.

LBL has prepared a Surface Water Management Plan which assesses the risk of flooding from sewers and surface water in greater detail, and it is recommended that the Council refer to this document for further information on flooding from these sources.

Baseline conditions and existing issues

Fluvial flooding

5C12.8 The key main rivers within Lambeth Borough are:

- River Thames;
- River Graveney; and
- River Effra

5C12.9 The tidal River Thames runs along the northern boundary of The London Borough of Lambeth from Nine Elms and Vauxhall in the west to the Oxo Tower in the east. The 3.2km frontage is actively defended by raised embankments and hard defences that protect Lambeth from large scale flood events.

5C12.10 The tidal limit of the River Thames is situated at Teddington Weir approximately 15km upstream of Lambeth. The Borough is therefore potentially at risk from both fluvial and tidal flooding from the Thames.

5C12.11 A 1km stretch of the River Graveney, a tributary to the River Wandle runs through the Streatham / Norbury area to the southern extent of the Borough, joining the Wandle at South Wimbledon. The source of the River Graveney is located in the vicinity of Selhurst and the upper reaches are often referred to as the Norbury Brook. The watercourse is canalised throughout Lambeth.

5C12.12 The EA have provided details of flooding instances on the Graveney from their flood records database for the years; 1968, 1973, 1977,1978,1981,1983 and 1987.

5C12.13 The River Effra flows entirely underground. It rises to the south of Lambeth near Crystal Palace, and flows in a northerly direction through Norwood Cemetery, Dulwich, Herne Hill, Brockwell Park, Brixton, Kennington to flow out into the Thames by Vauxhall Bridge.

5C12.14 Historical anecdotal evidence suggests that the watercourse flooded during heavy rains every decade or so, with records of flooding in July 1890, June 1914 and again in June 2007. Flooding was recorded along its path in the Elder Road/Chestnut Road area of West Norwood.

5C12.15 The Environment Agency has provided a Flood Map for Lambeth (Figure 7). The Flood Map shows the estimated extent of Flood Zones 2 (area with a 1 in 1000 or greater annual probability of flooding) and Flood Zone 3 (area with an annual probability of less than or equal to 1 in 100 fluvial flood risk or 1 in 200 tidal flood risk) (ignoring the presence of flood defences) for all main rivers and/or watercourses with identified critical drainage problems. The Flood Map gives a good indication of the areas at risk of flooding within the Borough however; it does not provide detail on individual properties.

Sewer flooding

- 5C12.16 A large network of sewers is located in Lambeth. Modern sewer systems are typically designed to accommodate rainfall events with a 1 in 30 year return period. Older sewer systems were often constructed without consideration of a design standard therefore some areas of the London Borough of Lambeth may be served by Victorian sewers with an effective design standard of less than 1 in 30 years. Much of the London sewer network is a combined system with storm and foul drainage served by a single sewer. As a result sewer flooding events where they occur can often be frequent, although the scale of consequence is generally small.

Surface water flooding

- 5C12.17 In 2004 intense periods of rainfall and thunderstorms caused extensive surface water flooding which caused damage to residential properties, public services and private businesses in the Herne Hill, Dulwich, Streatham Hill and Brixton areas. A reported 60mm of rain fell in just under one hour. In 2005 flash flooding caused problems on three major roads in the borough as a result of heavy rain and hailstones, particularly in the Stockwell and Oval areas. Intense periods of rainfall caused flash floods in 2007 and the capacity of the existing drainage system to be exceeded in some locations across the borough. London Underground / TfL reported closures of up to 3 hours at Clapham Common, Kennington, Stockwell and Vauxhall railway stations as a result of surface water flooding. The London Borough of Lambeth did not record any substantial flooding to residential / commercial properties as a result of this rainfall event however regular basement flooding has been reported in Herne Hill, West Norwood and in Streatham Vale.

Groundwater flooding

- 5C12.18 There is limited information regarding historical instances of groundwater flooding. Local knowledge provided by Lambeth has noted that instances of groundwater flooding have been reported on Ferndene Road adjacent to Ruskin Park in Central Brixton and Dulwich Road adjacent to Brockwell Park. There are also instances of groundwater flooding reported in West Norwood, Streatham, Streatham Hill, east of Clapham Common and Brixton. This data should be used with caution as it is anecdotal and may not be solely caused by groundwater flooding, surface water and/or overland flow may also be contributing.

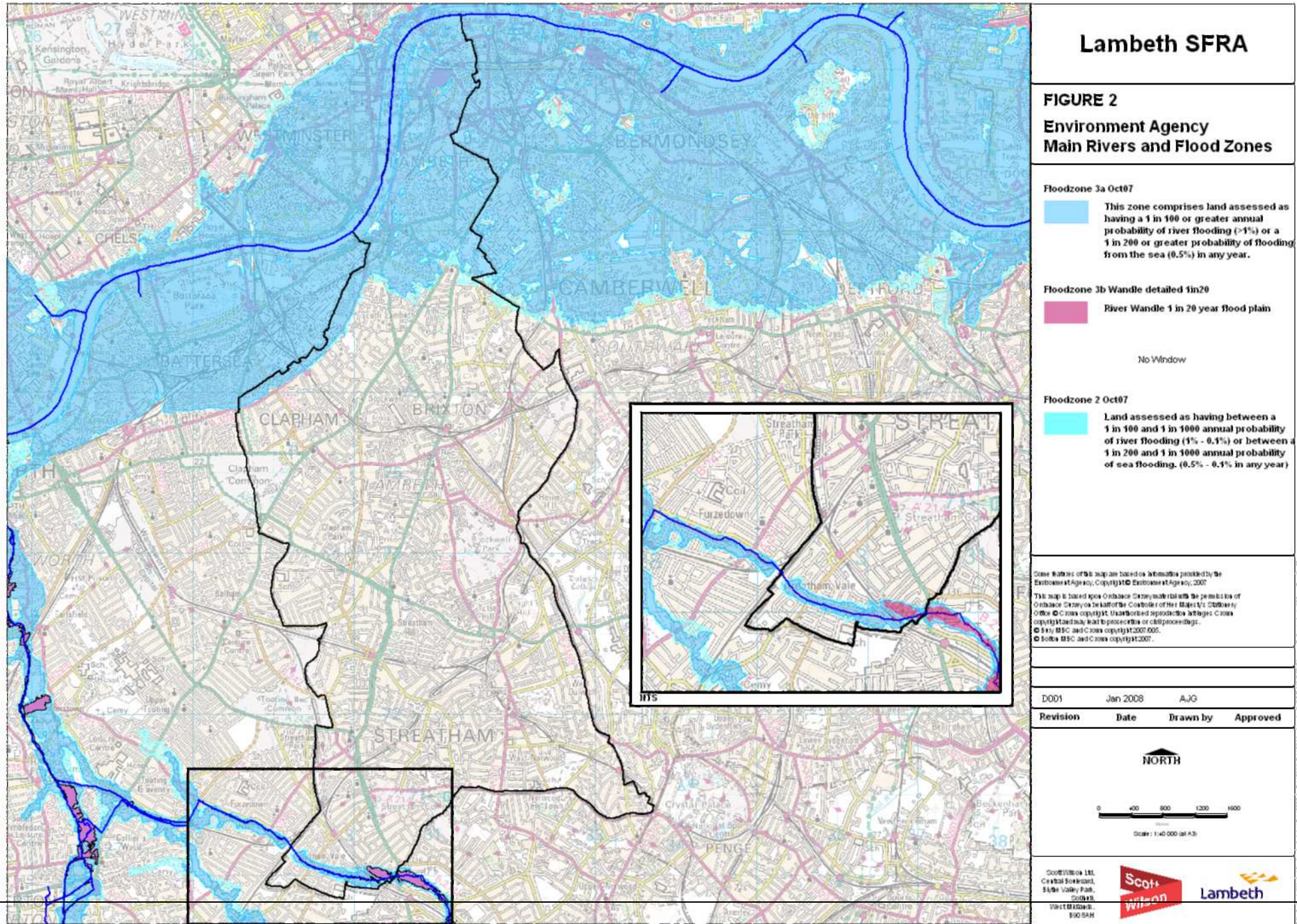
There are two reservoirs located in the Borough, the first at Brixton Hill on Waterworks Road and the second on Wavetree Road.

- 5C12.19 London has reasonable high levels of rainfall, but the density of population means that water usage is also going to be increasingly important in the future. The south east of England is an area of serious water stress and water efficiency measures will be essential to support new growth in the Borough. Lambeth is within the London Resource Zone. Average household water consumption for Lambeth in 2010/11 was 166.5 litres per person per day (Environment Agency 2012).

- 5C12.20 There were no major (category 1) or significant (category 2) water pollution incidents in Lambeth between 2005 and 2010 however; there were eight minor incidents, resulting from fires, containment and control failures and authorised activity (storm sewage discharge).

Likely evolution without the Plan

- 5C12.21 In the absence of the Local Plan the Council will need to rely on the provisions in the Core Strategy and London Plan. Water supply issues may be less appropriately managed in new developments; the uptake of sustainable urban drainage systems may be lower, and development may not appropriately reflect local flood risks in the Borough.



Assessment of Policies

5C12.22 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 12, water resources and flood risk. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.

5C12.23 The following policies have been screened as having potential for significant effects on this objective.

| | |
|---|-------------------------------|
| D1 – Delivery and monitoring | Q9 – Landscaping |
| D2 – Presumption in favour of sustainable development | Q14 – Development in gardens |
| D3 – Infrastructure | Q26 – Tall buildings |
| D4 – Planning obligations | PN1 – Waterloo |
| H1 – Maximising housing delivery | PN2 – Vauxhall |
| T5 – River transport | PN3 – Brixton |
| T7 – Parking | PN4 – Streatham |
| T10 - Telecommunications | PN5 – Clapham |
| EN1 – Open space | PN6 – Stockwell |
| EN4 – Sustainable design and construction | PN7 – West Norwood |
| EN5 – Flood risk | PN8 – Kennington / Oval |
| EN6 – Sustainable drainage systems and water management | PN9 - Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and Monitoring policies D1 – D4

5C12.24 The above policies seek to work with partners on delivering infrastructure and includes water and flood management infrastructure that will result in improved quality of water and water bodies such as Thames Tunnel, and improvement works for the River Graveney including flood storage and riparian bank improvements. In terms of improving water quality, significant positive effects are considered likely to result and improvements to flood defences is likely to reduce flood risk of surrounding areas.

Housing policy H1

5C12.25 A significant number of new dwellings (at least 11,950 pa in line with London Plan requirements) are proposed for delivery in the Borough. Inevitably, this policy will have a significant negative effect on this objective as it will result in increased water use and may increase flood risk. It is noted that London Plan Integrated Impact Assessment (2009) concluded that 'whilst it is recognised that the increase in population, and the number of houses, may have an aggregate increase on the demand for water, such effects are mitigated by policies elsewhere in the plan...and accordingly the level of housing proposed is unlikely to significantly affect the water resources objective'. It is also important to point out that the SHLAA (Strategic Housing Land Availability Assessment) considered flood risk when calculating the potential housing capacity in London (Integrated Impact Assessment 2009).

5C12.26 A number of Local Plan policies seek to mitigate impacts on the objective. Where located in identified flood zones, the design of housing will need to provide for flood risk, and policy EN5 Flood Risk seeks to mitigate possible adverse effects. Large scale new development, such as that proposed for Vauxhall, provides significant opportunity to incorporate flood resilient design and appropriate design to mitigate surface water run-off. All dwellings will need to be built to a minimum of Code for Sustainable Homes Level 4, which should also incorporate water management features in housing design.

Transport policies T5, T7, T10

- 5C12.27 Transport policies seek to discourage private vehicle journeys and encourage more sustainable forms of travel including walking, cycling and public transport. By discouraging private vehicles and encouraging car-free developments; better water quality can result from reduced contaminants in surface water run-off from roads. Similarly, permeable parking surfaces provide areas of land where water can infiltrate into the ground reducing runoff rates and discharges into wastewater network. Policy T5 on river transport ensures that any new pier or improvement to an existing pier will not have an adverse impact on the flood defences of the Thames. Telecommunications should not be located in areas or in a way that exposes it to flood damage and in response to previous SA recommendation, this has been included within the supporting text of policy T10. Therefore these policies are likely to have a significant positive effect on this objective.

Environment policies EN1, EN4 – EN6

- 5C12.28 Open spaces can also act as flood storage areas, reducing the amount of surface water flooding and runoff by allowing infiltration of water into the ground. It is considered that policy EN1 supports sustainable urban drainage systems, improves the quality of surface waters and groundwater and minimises flood risk and will therefore result in significant positive effects on the attainment of SA Objective 12.
- 5C12.29 Policy EN4 seeks sustainable design and construction of all developments, including residential (Code for Sustainable Homes), non-residential (BREEAM) and construction of the public realm. The CSH and BREEAM tools contain standards for water consumption and surface water run-off. The policy supports living walls and roofs. Indeed green roofs can also contribute to sustainable drainage and can effectively reduce the risk of localised flood by reducing surface run-off. Improvements to this policy (i.e. requiring higher sustainability standards) in response to previous SA recommendations will likely result in more positive effects with regards to water quality, and wise management and sustainable use of water in developments.
- 5C12.30 Policy EN5 is on the management of flood risk for the borough whereby the impact of flood will need to be minimised and the outcomes of the SFRA respected. Areas identified as at highest risk of fluvial and tidal flooding are Waterloo, Vauxhall and adjacent to the River Graveney. The policy also states that development should be steered towards areas of lowest flood risk. However, significant development is proposed in the London Plan (and subsequently in the Local Plan), for the Waterloo and Vauxhall Opportunity Areas. Implementation of policy EN5 should help to manage and reduce flood risk as much as possible with sequential tests met. To more effectively minimise flood risk as required by SA Objective 12; it is considered that flood defence walls are maintained and improved to be fit for purpose. At no one time should flood defence walls be 'in poor condition'. The recommendation made (and accepted) for this policy in the work against SA Objective 4 provides significant positive effects for SA Objective 12.
- 5C12.31 It is considered that policy EN6 on sustainable drainage systems and water management, together with policy EN5, will mitigate the negative effects of the level of growth provided for the borough – they should be effective in improving the quality of surface waters and groundwater, the wise management of water, and in minimising flood risk through ensuring appropriate flood storage capacity. The policy recognises it is essential for adequate local public sewerage network infrastructure to be in place ahead of development to avoid unacceptable impacts on the environment such as sewage flood of residential and commercial development and pollution of

land and watercourses. The recommendation made in SA Objective 4 and accepted by the Council will likely provide significant positive effects for SA Objective 12. The amendment to policy helps avoid water shortages with associated low pressure water supply problems.

5C12.32 The success of the policies is largely dependent on the extent and variety of water efficiency measures implemented, ambitiousness and commitment to conform to the policies, and enforcement. Therefore effects are likely to be uncertain particularly in short term while development occurs, measures like SUDs are delivered and innovative approaches such as grey water recycling are more mainstream and costs decrease.

5C12.33 Previous SA recommendations and accepted made under SA Objective 4 also work to contribute positive effects for SA Objective 12.

Quality of built environment policies Q9, Q15, Q26

5C12.34 Landscaping can refer to both soft and hard landscaping. In response to previous SA recommendation, policy Q9 landscaping has been significantly improved to enable more positive effects for managing surface water runoff and minimising flood risk. Landscaping of developments needs to maximise opportunities for greening (thereby contributing to reducing runoff rate) and should provide sustainable drainage and minimise surface runoff. Policy Q14 on development in gardens and backland sites should reduce surface water runoff of sites through limiting development in these areas and protecting permeable drainage and openness as well as biodiversity, soft landscaping.

5C12.35 Supporting text paragraph 10.111 identifies Vauxhall, Albert Embankment and Waterloo as locations appropriate for tall buildings. These areas are also known flood risk areas. Provided such buildings are designed to be flood resistant and resilient (in line with policy EN5), it is considered that tall buildings in these locations are more likely to reduce flood risk to people and property above the flood level than more traditional lower built dwellings/buildings.

Places and neighbourhoods policies PN1 – PN11

5C12.36 The level of growth proposed is inevitably going to place increased stresses on the water resource and these policies are likely to have a significant negative effect on this objective. Mitigation of the effects of the development proposed in the places and neighbourhoods policies will be provided through other relevant policies on water and flood risk, particularly EN4, EN5 and EN6. Uncertainties arise around the fact that the success of these policies is dependent upon implementation, ambitiousness sought by developer / encouraged by the Council, and enforcement. In response to previous SA recommendations, policies PN1 Waterloo and PN2 Vauxhall now recognise the flood risk in these areas.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C12.37 All sites in Table 45 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 12.

Table 44: Significance criteria for SA Objective 12: Water and Flood Risk

| Positive | Negative |
|---|---|
| <p>Encourages water conservation and prudent use.</p> <p>Site specific allocations:</p> <ul style="list-style-type: none"> • no land contamination issues; • protects or improves water quality; • not adjacent to a watercourse. <p>Flooding</p> <ul style="list-style-type: none"> • doesn't impact upon flood risk area (flood zones 2 or 3) • not at risk of all types of flooding • SUDS is viable • Minor positive – if an element of off-site enhancement is offered. | <p>Likely to exacerbate water consumption pressures in areas of water stress.</p> <p>Site specific allocations:</p> <ul style="list-style-type: none"> • land contamination issues; • threat to water quality; • adjacent to a watercourse. <p>Flooding</p> <ul style="list-style-type: none"> • located in high flood risk area and likely to increase flood risk, or where SUDS is constrained. <p>Minor negative</p> <ul style="list-style-type: none"> • - if no off-site enhancement is offered by the site |

TABLE 45: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 12: WATER AND FLOOD RISK

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|--|---|--|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | | <ul style="list-style-type: none"> - site within flood zone 3 - Water supply and sewerage capacity may be under increased pressure from extra demand? | <p>Compliance with Local Plan policies particularly EN4 – EN6</p> <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of SRFA |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | <ul style="list-style-type: none"> - site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course | <ul style="list-style-type: none"> - possible land contamination issues (former petrol station) - Likely to exacerbate water consumption pressures | <p>Compliance with Local Plan policies particularly EN4 – EN6</p> <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of SRFA |
| 3 | Vale Street Depot, Vale Street SE27 | <ul style="list-style-type: none"> - site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course - addresses potential land contamination issues | <ul style="list-style-type: none"> - Likely to exacerbate water consumption pressures | <p>Compliance with Local Plan policies particularly EN4 – EN6</p> <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of SRFA |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> - site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course | <ul style="list-style-type: none"> - Likely to exacerbate water consumption pressures | <p>Compliance with Local Plan policies particularly EN4 – EN6</p> <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of SRFA |
| 5 | Elizabeth House, York Road SE1 | | <ul style="list-style-type: none"> - site within flood zone 3 - Likely to exacerbate water consumption pressures | <p>Compliance with Local Plan policies particularly EN4 – EN6</p> <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of SRFA |
| 6 | Shell Centre, 2-8 York Road SE1 | | <ul style="list-style-type: none"> - site within flood zone 3 - Likely to exacerbate water consumption pressures | <p>Compliance with Local Plan policies particularly EN4 – EN6</p> <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of SRFA |
| 7 | Waterloo Station, Waterloo Road SE1 | | <ul style="list-style-type: none"> - site within flood zone 3 - Likely to exacerbate water consumption pressures | <p>Compliance with Local Plan policies particularly EN4 – EN6</p> <ul style="list-style-type: none"> - Site specific flood risk assessment has been carried out as part of SRFA |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | | <ul style="list-style-type: none"> - site within flood zone 3 - Likely to exacerbate water consumption | <p>Compliance with Local Plan policies particularly EN4 – EN6</p> |

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| | | | pressures | - Site specific flood risk assessment has been carried out as part of SRFA |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | | - site within flood zone 3 - Likely to exacerbate water consumption pressures | Compliance with Local Plan policies particularly EN4 – EN6 - Site specific flood risk assessment has been carried out as part of SRFA |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | | - site within flood zone 3 - Likely to exacerbate water consumption pressures | Compliance with Local Plan policies particularly EN4 – EN6 - Site specific flood risk assessment has been carried out as part of SRFA |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | | - site within flood zone 3 - Likely to exacerbate water consumption pressures | Compliance with Local Plan policies particularly EN4 – EN6 - Site specific flood risk assessment has been carried out as part of SRFA |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | | - site within flood zone 3 - Likely to exacerbate water consumption pressures | Compliance with Local Plan policies particularly EN4 – EN6 - Site specific flood risk assessment has been carried out as part of SRFA |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | | - site within flood zone 3 - Likely to exacerbate water consumption pressures | Compliance with Local Plan policies particularly EN4 – EN6 - Site specific flood risk assessment has been carried out as part of SRFA |
| 14 | Somerleyton Road SW9 | - site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course | - possible land contamination issues (vehicle maintenance depot) - Likely to exacerbate water consumption pressures | Compliance with Local Plan policies particularly EN4 – EN6 - Site specific flood risk assessment has been carried out as part of SRFA |
| 15 | Popes Road SW9 | - site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course | - Likely to exacerbate water consumption pressures | Compliance with Local Plan policies particularly EN4 – EN6 - Site specific flood risk assessment has been carried out as part of SRFA |
| 16 | Brixton Central (between the viaducts) | - site within flood zone 1 (doesn't impact | - potential to exacerbate water | Compliance with Local Plan |

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| | SW9 | of flood risk areas) - not adjacent to a water course | consumption pressures | policies particularly EN4 – EN6 - Site specific flood risk assessment has been carried out as part of SRFA |
| 17 | 'Your New Town Hall' SW2 | - site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course | - Likely to exacerbate water consumption pressures | Compliance with Local Plan policies particularly EN4 – EN6 - Site specific flood risk assessment has been carried out as part of SRFA |
| 18 | 286 - 362 Norwood Road SE27 | - site within flood zone 1 (doesn't impact of flood risk areas) - not adjacent to a water course | - Likely to exacerbate water consumption pressures | Compliance with Local Plan policies particularly EN4 – EN6 - Site specific flood risk assessment has been carried out as part of SRFA |

Summary of Local Plan policies and site allocations

5C12.38 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, projected population growth, and the housing targets assigned in the London Plan to be delivered in Lambeth; it is considered that Local Plan policies seek to achieve SA Objective 12.

Table 46: Summary assessment of effects of Local Plan on water and flood risk

| Assessment of effects of the Local Plan on SA objective 12 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|--|------------|---|---|------------------------|
| <p>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>+/?</p> | <p>It is accepted that there is likely to be increases in water use and increased flood risk associated with the levels of growth projected for the borough.</p> <p>In the London Plan SA, it was concluded that whilst 'increases in population, and the number of houses, may have an aggregate increase on the demand for water, such effects are mitigated by policies elsewhere in the London Plan' (IIA 2009). Similarly, their analysis of housing growth on flood risk objective was that as other such policies in the Plan (i.e. those set out in Chapter 5 of the London Plan) provide mitigation, 'it is considered that there is unlikely to be any significant direct effects against this objective' [flood risk].</p> <p>However, it is unclear from the appraisal of Lambeth's policies whether they will be able to completely mitigate the effects of the new development. Policy EN6 on sustainable drainage systems and water management, together with policy EN5, should be effective in improving the quality of surface waters and groundwater, the wise management of water, and in minimising flood risk through ensuring appropriate flood storage capacity, increased permeable surfaces, provision for water recycling in developments and flood resilient design.</p> <p>The success of the policies is largely dependent on the extent and variety of water efficiency measures implemented, ambitiousness, extent and commitment to comply with the policies and enforcement. Therefore effects are likely to be uncertain particularly in short term while development occurs, measures like SUDs are delivered and until innovative approaches such as grey water recycling are more mainstream and costs decrease.</p> <p>Policy EN5 Flood Risk provides a realistic response in addressing flood risk while meeting London Plan housing targets and developing the Opportunity Areas identified in the London Plan. The policy also recognises the sequential and exception tests of the NPPF. In their representation on the Sustainability Appraisal of the Draft Local Plan; the Environment Agency agreed with SA analysis that 'policy EN5 on flood risk appropriately addresses and minimises effects on developments of flood risk, including impacts arising from future climate</p> | <p>All development in identified flood zones two and three will be subject to the sequential and exception tests. Flood risk assessments will be required at more local levels (site specific) therefore it is likely that flood risk will be managed through design, landuse, and emergency management procedures. Flood risk assessments have already been completed for all 18 site allocations.</p> <p>It is likely that redevelopment of Opportunity Areas will commence in the short-term and be completed in the long-term. Delivery of SUDS and living roofs and walls will occur concurrently with development and therefore is unlikely to be evident until the mid to long term, particularly as such features become established.</p> | <p>Permanent</p> |

| | | | |
|--|---|--|--|
| | <p>change' (EA, April 2013).</p> <p>Recommendations made in this SA (under SA Objective 4) to ensure flood defences are at all times fit for purpose; and that there is adequate water supply capacity for new developments should result in more positive effects for SA Objective 12.</p> <p>However, given that delivery of the Local Plan proposes significant development in Opportunity Areas along the Thames; in order to reduce and manage flood risk, there will be great dependence on design, emergency planning and upgrade and maintenance of defence systems (the latter two outside the scope of LDF planning). Further development and intensification probably does not reduce risk, but design can mitigate flood effects should defences be breached (i.e. manages the flood risk) and therefore minimises flood risk. Tall buildings for example can reduce flood risk for dwellings / commercial space above the flood level.</p> <p>Therefore, it is considered that the cumulative effects of attaining SA Objective 12 are largely dependent upon implementation. It is for this reason that effects are to some extent uncertain. Developments in Opportunity Areas need be of highest quality design, but this must also incorporate flood resilience.</p> <p>The design of new developments, including alterations to existing developments requires consideration of natural resources like water. Installation and incorporation of water efficiency measures are expected. However, delivery of water demand measures such as greywater recycling and rainwater harvesting is uncertain, particularly if it can be demonstrated as making developments unfeasible or unviable.</p> | | |
|--|---|--|--|

Recommendations for monitoring of uncertain effects

- 5C12.39 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:
- § Number of developments which have had Surface Water Flood Risk Assessments approved by the Environment Agency and incorporate sustainable urban drainage systems
 - § Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality issues.

5C13. WASTE

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

Objective 13: Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.

5C13.2 To achieve this objective, plan policies should aim to minimise the production of waste, maximise recycling and reuse during construction, and decrease the demand for raw materials from unsustainable sources e.g. through reusing demolition material onsite and using products made from recycled materials; make waste avoidance, reuse and recycling easy for residents and visitors; help develop markets for recycled products by using them; enable safe storage of waste and recycling, convenient for both residents and collectors; and make appropriate provision for waste management facilities in the Borough to help meet the London Plan apportionment and self sufficiency targets.

Relevant policy objectives

National Level

5C13.3 *Planning Policy Statement 10 – Planning for Sustainable Waste Management (2011)* states that the Government’s overall objective on waste is to protect human health and the environment by producing less waste and by using it as a resource wherever possible. The Government promotes sustainable waste management, moving the management of waste up the ‘waste hierarchy’ of reduction, reuse, recycling and composting, using waste as a source of energy, and only disposing as a last resort.

Regional Level

5C13.4 Policies 5.16 – 5.19 of the *London Plan (2011)* address waste and makes provision for zero waste to the landfill by 2031, reuse and reduction in the use of materials, exceeding recycling/composting levels and allocation of sufficient land / waste management facilities to meet waste apportionment targets.

Baseline conditions and existing issues

5C13.5 Lambeth is a Waste Planning Authority and a Waste Collection Authority. The Western Riverside Waste Authority (WRWA) is the Waste Disposal Authority for Lambeth, Wandsworth, Hammersmith and Fulham, and Kensington and Chelsea.

5C13.6 The tables below set out the quantity of municipal waste and the way in which it was managed, by management type, in 2012/13.

Table 47: Local Authority Collected Municipal Waste (LACMW) 2012/13

Source: Lambeth sustainable waste management service 2013

| | Landfill | Incineration with EfW* | Recycled | Composted | Other (reused) | Total Waste Arisings |
|------------------------------------|----------|------------------------|----------|-----------|----------------|----------------------|
| Amount of waste arisings in tonnes | 10 | 95,544 | 20,622 | 3,051 | 172 | 119,398 |

*Energy from Waste

Table 48: Municipal Waste Management by Type

Source: Lambeth sustainable waste management service 2012

| Total Municipal Waste | Management | Tonnes | % | Total Tonnes |
|-----------------------|-----------------|------------|-------|-------------------|
| 2004/05 | Recycling | 14,564.04 | 9.36 | 155,653.99 |
| | Composting | 2,846.36 | 1.83 | |
| | Energy Recovery | 93.27 | 0.06 | |
| | Disposal | 138,150.3 | 88.75 | |
| 2005/06 | Recycling | 18,031.41 | 11.64 | 154,866.8 |
| | Composting | 4,418.34 | 2.85 | |
| | Energy Recovery | 92.89 | 0.06 | |
| | Disposal | 132,324.2 | 85.44 | |
| 2006/07 | Recycling | 19,694.03 | 12.77 | 154,237.51 |
| | Composting | 3,630.3 | 2.35 | |
| | Energy Recovery | 219.78 | 0.14 | |
| | Disposal | 13,0693.4 | 84.74 | |
| 2007/08 | Recycling | 22,026.41 | 15 | 151,224.03 |
| | Composting | 3,835.88 | 3 | |
| | Energy Recovery | 151.33 | 0.10 | |
| | Disposal | 125,210.41 | 82.80 | |
| 2008/09 | Recycling | 21,884.51 | 15.51 | 141,061.64 |
| | Composting | 3,282.17 | 2.33 | |
| | Energy Recovery | 90.42 | 0.06 | |
| | Disposal | 115,623.99 | 81.97 | |
| 2009/10 | Recycling | 21,608.87 | 16.52 | 130,815.97 |
| | Composting | 3,756.23 | 2.87 | |
| | Energy Recovery | 75.40 | 0.06 | |
| | Disposal | 105,218.98 | 80.43 | |
| 2010/11 | Recycling | 21,845.07 | 17.14 | 127,457.77 |
| | Composting | 3,508.64 | 2.75 | |
| | Energy Recovery | 48.10 | 0.04 | |
| | Disposal | 101,862.20 | 79.92 | |
| 2011/12 | Recycling | 22,428.36 | 18.84 | 119,049.18 |
| | Reuse | 182.02 | 0.15 | |
| | Composting | 3,079.18 | 2.59 | |
| | Energy Recovery | 76,635.59 | 64.37 | |
| | Disposal | 16,724.02 | 14.05 | |
| 2012/13 | Recycling | 20,622 | 17.27 | 119,398 |
| | Reuse | 172 | 0.14 | |
| | Composting | 3,051 | 2.56 | |
| | Energy Recovery | 95,544 | 80.0 | |
| | Disposal | 10 | 0.01 | |

5C13.7 The total amount of waste arising in Lambeth has generally continued to decrease periodically despite population numbers increasing. Table 48 shows that there has been steady reductions of total waste arising since 2004/5. In 2012/13 Lambeth produced about 349 tonnes more waste than in 2011/12, and 36,256 tonnes less waste than in 2004/05. The slight increase in waste in the last financial year may be attributable to a slight upturn in the economy but it is difficult to know with certainty. Table 48 also shows a general trend towards increased levels of recycling and composting and a reduction in disposal (i.e. landfill). In mid 2011 significant amounts of waste was diverted from landfill to Energy from Waste facility at Belvedere.

- 5C13.8 The council's recycling initiatives have been successful in seeing an increase in the total amount of recycling from 9.36% of municipal waste in 2004/05 to 17.14% in 2009/10.
- 5C13.9 The proportion of household waste that is recycled or composted has increased year on year from less than ten per cent in 2001/02 to almost 28 per cent in 2010/11.
- 5C13.10 There is currently a shortfall of 197,417 tonnes per annum between the capacity of existing waste sites in Lambeth and the London plan apportionment to 2031.

Likely evolution without the Plan

- 5C13.11 The Council will continue with its waste management procedures in the absence of the Local Plan. However, there is a requirement to address the London Plan waste apportionment by identifying scope for additional waste management. The Local Plan provides the framework for safeguarding sites in the borough for waste management and transfer use. It also identifies and promotes KIBAS as appropriate locations for additional waste management uses. With projected population growth and additional dwellings, new development will need to incorporate appropriate waste management mechanisms such as composting facilities and use of recycled materials.

Assessment of Policies

- 5C13.12 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 12, waste. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.
- 5C13.13 The following policies have been screened as having potential for significant effects on this objective:

| | |
|--|----------------------------------|
| D1 – Delivery and monitoring | Q20 – Statutory listed buildings |
| D2 – Presumption in favour of sustainable development | Q22 – Conservation Areas |
| D3 – Infrastructure | Q24 – River Thames |
| D4 – Planning obligations | PN1 – Waterloo |
| H1 – Maximising housing delivery | PN2 – Vauxhall |
| ED1 - KIBAs | PN3 – Brixton |
| ED3 – Large offices | PN4 – Streatham |
| ED11 – Visitor attractions, leisure, arts and culture uses | PN5 – Clapham |
| ED13 – Markets | PN6 – Stockwell |
| T8 - Servicing | PN7 – West Norwood |
| EN4 – Sustainable design and construction | PN8 – Kennington / Oval |
| EN7 – Sustainable waste management | PN9 - Herne Hill |
| Q12 – Refuse/ recycling storage | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and monitoring policies D1 – D4

- 5C13.14 Use of vacant buildings as provided for in policy D1 is an effective way of minimising the production of waste associated with new construction. It results in significant positive effects in terms of reuse and recycling of materials. Policy D4 on planning obligations includes use of funds for provision of infrastructure, and some examples are provided. Waste is not included in the list under clause (b); however infrastructure is defined in the glossary in terms of green, physical and social. It is

expected that waste would be included within this definition, and therefore is included within policy D4.

Housing

5C13.15 Policy H1 seeks to maximise the supply of additional homes in Lambeth. London Plan policy requires at least 11950 net additional dwellings over the period 2011 – 2021 and Lambeth policy seeks to exceed this allocation. This will result in increased domestic (and construction) waste and therefore likely to result in negative effects on the objective. However, population growth is expected for the whole of London, and if some of the required housing is not accommodated in Lambeth, it will simply be accommodated elsewhere in London. Therefore, it is unlikely there will be any net decrease in regional domestic waste if the level of housing proposed for Lambeth under policy H1 does not go ahead. In addition, housing will need to be sustainably built to the Code for Sustainable Homes standard which includes waste provision in its assessment. It is noted that the IIA of the replacement London Plan concluded that no significant impacts on the waste objective are anticipated as a result of increase housing because such issues and effects are mitigated by other policies contained in the Plan.

Economic development policies ED1 – ED3, ED11, ED13

5C13.16 The economic development policies of the Local Plan seek to stimulate economic growth in the Borough. Accordingly, such growth and development will likely produce additional commercial and business orientated waste. Waste will be generated from day to day operations of businesses, but also from initial set-up, especially if new buildings are required. Where possible, existing buildings should be retained and incorporated into the design of new development (BREEAM awards credits for this in their assessments (policy EN4)).

5C13.17 Policy ED1 ensures there is land supply for waste management uses within KIBAs. Land within KIBAs is protected for use for business, industrial, storage and waste management uses, including green industries like recycling, refurbishing and repair. The policy therefore should result in positive effects on SA Objective 13 by ensuring an adequate supply of land to meet the future waste management requirements of the borough during the plan period. However, changes in permitted development rights from B1 to residential may result in loss of land in KIBA use which may have a detrimental effect /reduce options for sites for future waste management use. All sites in current waste management or transfer use are protected by policy EN7, whether they are within a KIBA or not.

5C13.18 Policy ED3 generally seeks to retain large offices but allows for redevelopment or change of use of large offices subject to tests, one being that it would not be feasible and/or viable to refurbish, renew or modernise existing offices to meet current requirements. This indirectly seeks to minimise construction waste. New development proposals will generate increased waste, particularly if demolition is involved. Increased tourism, visitors, and markets can increase litter levels and general waste. Other Local Plan policies seek to manage such impacts (e.g. EN7, T8).

Transport policy T8

5C13.19 The Delivery and Servicing Plan required by policy T8 will include information on waste collection services and therefore results in positive effects on the objective.

Environment policies EN4 and EN7

5C13.20 The Code for Sustainable Homes and BREEAM standards both include waste management measures as part of their assessment of development proposals where credits are awarded for effective waste management including reuse and recycled materials. By seeking higher sustainability standards (in response to previous SA recommendation); the likelihood of developments reducing waste and increasing reuse, recycling and recovery rates is improved. Existing waste transfer and management sites are safeguarded under policy EN7, and this policy also supports policies ED1 and ED2 in the protection and provision of business sites used for waste management. This is likely to result in significant positive effects on the objective. Policy EN7 respects the waste hierarchy, in particular the efficient use of resources, the reuse of materials and resources and the recovery of energy from materials. In the interests of maximising effects in terms of waste management, it is considered that on-site waste management facilities should be incorporated into all major development proposals. Waste is an integral part of development and growth and should therefore be managed as much as possible locally and on-site. It is considered that on-site waste management facilities should be incorporated into all developments, not just major developments. Such facilities may be commensurate with the level of development proposed. Similarly, rather than stating 'unless it is demonstrated that provision is not viable'; if this part of the policy must be retained the word 'viable' should be replaced with 'feasible'. It is noted that supporting text paragraph 9.55 refers to the word 'feasible'. The policy may benefit from some supporting text on what constitutes on-site waste management facilities outside the ambit of refuse / recycling storage (policy Q12).

5C13.21 While the policy (EN7) does not explicitly mention Site Waste Management Plans (SWMP), supporting text paragraph 9.61 does. The Site Waste Management Plans Regulations 2008 impose a legal duty to prepare such a plan for a project on any one construction site with an estimated cost greater than £300,000. Therefore it may not be necessary for the Local Plan to contain policy on SWMP, however it is considered that such plans offer environmental and economic benefits for all planning applications, including those not bound by statutory requirement. At the very least it will require developers to consider waste as an integral part of their project in a holistic manner. The Site Waste Management Plan should include detail on options for reducing, segregating, storing and removing waste from site. More guidance will be provided in the updated Sustainable Design and Construction SPD. Delivery and servicing plans required under policy T8 should also include waste management / collection services. In response to previous SA recommendations, specific reference to composting has been added to the policy and supporting text, thereby contributing to on-site management of organic waste. Composting facilities would support local food growing (policy EN2).

SA Recommendation: to more effectively meet SA Objective 13, on-site waste management facilities should be incorporated into all development, not just major developments. Also, the word 'viable' in clause (c) should be replaced with 'feasible'.

Council Response: Having reviewed the policy in light of SA concerns; it is considered that 'on-site waste management facilities' could be better clarified in the supporting text. Changes have been made to para 9.60. This reflects the intended meaning of the policy, and no further changes to policy are deemed necessary.

5C13.22 Policy Q12 is for refuse and recycling storage. The policy helps meet SA Objective 13 by enabling safe storage of waste and recycling convenient both for residents and collectors.

5C13.23 Local Plan policies seek to sustain and enhance the historic environment, ensure heritage assets are in viable use and discourage development involving demolition in conservation areas. This has significant positive effects on SA Objective 13 as it significantly reduces the likelihood that designated buildings will be demolished to make way for new buildings, and therefore avoids increased levels of construction waste which forms a large contribution to London's waste production. Therefore, the adaptive re-use and full occupancy of historic buildings has an important relationship with the issue of waste.

Places and neighbourhoods policies PN1 – PN11

5C13.24 The Borough will see substantial new residential and mixed-use development in particular centres (for example Waterloo, Vauxhall, Brixton, Streatham) which will give rise to significant quantities of waste during construction and occupation. All places and neighbourhood policies excluding Brixton do not explicitly recognise this; however other Local Plan policies (e.g. EN7, Q13) will also apply to development occurring in these places, as well as other development strategies such as applicable Opportunity Area Frameworks, and SPDs which do address waste management and minimisation, for example the Vauxhall, Nine Elms and Battersea Opportunity Area (aka NEV) Framework proposes an anaerobic digestion plant at New Covent Garden market (in Wandsworth Borough).

5C13.25 Policy PN3 for Brixton seeks implementation of town centre energy and waste management strategies in line with 'One Planet Living' principles including sustainable waste management and recycling facilities. Incorporation of this into the policy is commended. However, given specific provision of waste is included in this policy and not others may suggest that there has been no regard or thought to the management of waste arising from proposed development in other centres. This was raised in previous SA work; and the reason for this approach in Brixton is because there are Brixton specific strategies for energy and waste management.

5C13.26 Policy PN8 has been amended in response to previous SA recommendation to clarify that appropriate re-use of the Oval House Theatre is sought.

5C13.27 Loughborough Junction currently accommodates two KIBAs; the Shakespeare Road Depot KIBA comprises a single use site used by the Council for storing its waste fleet. KIBAS are protected by policy ED1. Recycling centres are also in Loughborough Junction; however these are not located within KIBAs but protected by policy EN7. The Loughborough Junction policy PN10 makes provision for public realm improvements, creative industries, improved retail and leisure environment, reduced need to travel and to engender a sense of pride in the area. The Loughborough Junction Framework Plan addresses these existing KIBAs (and the waste services it offers the Borough) and how these will be incorporated into the successful local centre policy PN10 seeks to achieve.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C13.28 All sites in Table 50 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 13.

Table 49: Significance criteria for SA Objective 13: Waste

| Positive | Negative |
|--|--|
| <ul style="list-style-type: none">• Does not constrain appropriate sites for the sustainable management of waste within the borough and promotes sustainable waste management.• Improves design in order to encourage more sustainable waste management, e.g recycling. | <ul style="list-style-type: none">• Constrains future sustainable waste management options or locations.• Poor design for sustainable waste management. |

TABLE 50: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 13: WASTE

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|---|---|--|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | - does not constrain appropriate sites for the sustainable management of waste within the Borough - retention of 10 Royal Street and Holy Trinity Urban Centre (avoids demolition waste) | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 3 | Vale Street Depot, Vale Street SE27 | - retains existing reuse and recycling centre on site | - constrains future sustainable waste management options through loss of depot for waste collection vehicles - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 4 | New Park Road SW2 | - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 5 | Elizabeth House, York Road SE1 | - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 6 | Shell Centre, 2-8 York Road SE1 | - retains existing Shell Centre tower (avoids demolition waste) - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 7 | Waterloo Station, Waterloo Road SE1 | - retains existing buildings, train shed and terminal building (avoids demolition waste) - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | - does not constrain appropriate sites for the sustainable management of waste within the | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, |

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| | | Borough | | Q12 |
|----|--|--|--|--|
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | - site allocation seeks to bring back into use underused and vacant premises (avoids demolition and reduces construction waste) | - no mention of waste in terms of design for site - Existing KIBA on site may be compromised for its potential as waste management use with inclusion of residential use on site as proposed. | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | - existing public house to be retained - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | -retains listed building fronting Wandsworth Road (avoids demolition waste) - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 14 | Somerleyton Road SW9 | - does not constrain appropriate sites for the sustainable management of waste within the Borough - retains Carlton Mansions (avoids demolition waste) | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 15 | Popes Road SW9 | - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 16 | Brixton Central (between the viaducts) SW9 | - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |
| 17 | 'Your New Town Hall' SW2 | - includes refurbishment of key landmark buildings - inclusion of Conservation Area means Conservation Area Consent would be required for demolition of Town Hall Parade buildings, including robust justification - does not constrain appropriate sites for the sustainable management of waste within the | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |

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| | | | | |
|----|-----------------------------|---|---|--|
| | | Borough | | |
| 18 | 286 - 362 Norwood Road SE27 | - does not constrain appropriate sites for the sustainable management of waste within the Borough | - no mention of waste in terms of design for site | Compliance with other Local Plan policies particularly T8, EN4, EN7, Q12 |

Summary of Local Plan policies and site allocations

5C13.29 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is possible that the Local Plan could have a positive effect on the minimising waste, maximising reuse and recycling of waste, and increase landfill diversion. It is also considered that the Local Plan policies support and where appropriate improve existing baseline conditions.

Table 51: Summary assessment of effects of Local Plan for waste

| Assessment of effects of the Local Plan on SA objective 13 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|--|-------|--|--|--|
| Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates | +/? | <p>Positively, the Local Plan seeks to bring back into use vacant buildings and protects KIBAs and employment generating <i>sui generis</i> (which includes waste management) sites. However, the Plan also promotes significant levels of new development (particularly housing in response to London Plan requirements) and this is inevitably going to result in increased levels of waste. It is unclear from the appraisal whether policies will be able to completely mitigate effects of new development. This is addressed through the London Plan waste apportionment. The Local Plan identifies and promotes KIBAs as appropriate locations for waste management uses.</p> <p>Policy EN7 on waste management and policy Q12 refuse and recycling storage seek to mitigate effects and should result in positive effects with continued downward trends on waste arisings baseline data (i.e. reduction in waste arisings despite population increases). Some site allocations specifically seek to retain existing buildings or bring back into use underused and vacant premises. However most site allocations do not address waste in any further detailed way. It may be appropriate for site allocations to specify appropriate types of waste management, e.g. underground storage.</p> <p>Annex 2 Infrastructure Schedule identifies a current funding gap of £500K for the refurbishment of Lambeth's Reuse and Recycling Centre highlighting a potential uncertainty of managing future waste subject to the outcome of a funding bid. There is also an element of uncertainty on waste operators coming forward and locating in the borough. It is recognised that Plan promotes KIBAs for this use.</p> <p>Achievement of higher Code for Sustainable Homes and BREEAM standards should result in more positive effects with regards to waste as these assessment tools contain waste and reuse components/credits.</p> | <p>It is considered that operations to minimise waste, maximise reuse and recycling of waste and increase landfill diversion will be evident in the short term as excellent waste management procedures and facilities are already in operation.</p> <p>Evidence of achievement will unlikely be evident until at least the medium to long-term as the large scale redevelopment of key locations occurs, and funding is identified for the Waste Transfer Station / further capacity requirements are met and refurbishment of the reuse and recycling centre is completed.</p> | <p>Temporary effects associated with demolition and construction, however it is considered that these can be managed on-site, and reuse of materials will be encouraged.</p> <p>Growth in the Borough is likely to produce permanent and ongoing effects in waste generation and these will need to be continuously processed, managed and monitored in increasingly innovative ways as technologies develop, particularly towards the end of the Plan period.</p> |

Recommendations for monitoring likely uncertain effects

5C13.30 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § Annual update of Infrastructure Schedule
- § Capacity of new waste management facilities
- § Amount of municipal waste arising and managed by management type.

5C14. AIR QUALITY

5C14.1 This section of the SA relates to the sustainability performance of the Local Plan against:

Objective 14: To improve air quality.

5C14.2 To achieve this objective, plan policies should reduce PM10, NO2 and ozone depleting substances; help to achieve national and international standards for air quality (e.g. those set out in the Air Quality Regulations 2000 and (Amendment) Regulations 2002 as well as local air quality targets; support the planting of trees; and promote the 'transport hierarchy'.

Relevant policy objectives

National Level

5C14..3 The *National Planning Policy Framework 2012* states that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.

5C14.4 The *Air Quality Strategy (2007)* for England, Scotland, Wales and Northern Ireland provides a baseline of air quality and sets critical emissions levels not to be exceeded.

Regional Level

5C14.5 The *London Plan (2011)* contains a number of policies that seek to address air quality and natural resources. For example proposals should promote sustainable design and construction to reduce emissions, and aim to be 'air quality neutral' and not lead to further deterioration of existing poor air quality. Boroughs should seek reductions in levels of pollutants referred to in the Air Quality Strategy and take account of findings of local borough air quality review and assessments and action plans, in particular where Air Quality Management Areas have been designated.

Local Level

5C14.6 The Borough has an Air Quality Action Plan, the purpose of which is to ensure that air quality is considered corporately and to seek to reduce air pollution within the Borough, in pursuit of the Government's air quality objectives.

Baseline conditions and existing issues

5C14.7 The whole Borough is within an Air Quality Management Area in relation to a breach of nitrogen dioxide (annual mean and hourly mean) and particulate matters (daily mean and annual mean) objectives as specified in the Air Quality Regulations 2000.

5C14.8 Road traffic continues to be the primary cause of air pollution in London and in Lambeth around 90% of all air pollution is caused by road vehicles. Vehicle pollutants of greatest concern are Nitrogen Dioxide and Fine Particles (PM10). Carbon Monoxide and Volatile Organic Compounds such as Benzene and 1, 3-Butadiene are also of potential concern, as is Ozone.

5C14.9 The Borough continues to suffer from high levels of fine particles (PM10) and Nitrogen Dioxide (NO2). There is increasing evidence to show that despite all the efforts that have been made locally with implementing an Air Quality Action Plan, roadside and kerbside levels of Nitrogen Dioxide have not significantly decreased.

Levels of fine particles (PM10) have also remained broadly constant.

- 5C14.10 A recent Defra study has demonstrated that the emissions of vehicles in day-to-day driving conditions in cities -particularly diesel cars - have not been decreasing in line with the increasingly stringent EU limits applied to new designs.
- 5C14.11 Results from the 2011 census published in December 2012 show that 58% of households in Lambeth do not own a car – up from 51% in the previous 2001 census.

Likely evolution without the Plan

- 5C14.12 In the absence of the Local Plan the Council will need to rely on the provisions in the Core Strategy, Air Quality Action Plan and London Plan. Given the level of growth assigned to the Borough in the London Plan together with road traffic being a primary cause of air pollution; in the absence of the Local Plan growth may occur in a manner that generates more traffic movements, or using materials that are not locally sourced. Development granted under the NPPF will likely exacerbate local air quality problems.

Assessment of Policies

- 5C14.13 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 14, air quality. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.
- 5C14.14 The following policies have been screened as having potential for significant effects on this objective:

| | |
|---|---|
| D1 – Delivery and monitoring | T7 - Parking |
| D2 – Presumption in favour of sustainable development | T8 – Servicing |
| D3 – Infrastructure | EN4 – Sustainable design and construction |
| D4 – Planning obligations | Q10 - Trees |
| D5 - Enforcement | PN1 – Waterloo |
| H1 – Maximising housing delivery | PN2 – Vauxhall |
| T1 – Sustainable travel | PN3 – Brixton |
| T2 – Walking | PN4 – Streatham |
| T3 – Cycling | PN5 – Clapham |
| T4 – Public transport infrastructure | PN6 – Stockwell |
| T5 – River transport | PN7 – Oval |
| T6 – Assessing impacts of development on transport capacity | PN8 – West Norwood / Tulse Hill |
| | PN9 - Herne Hill |
| | PN10 Loughborough Junction |

Delivery and monitoring policies D1 – D5

- 5C14.15 The level of development proposed for the Borough is such that it is inevitably going to place increased stresses on air quality. However, effects can be mitigated. Policy D4 seeks to provide or fund local improvements to mitigate the impact of development and includes transport infrastructure (public transport, walking and cycling networks), public realm improvements and parking restrictions.
- 5C14.16 As highlighted previously there is some concern, particularly regarding cumulative impacts on air quality, with the policy approach of policy D5 Enforcement.

Transport policies T1 – T8

- 5C14.17 Taking into account the level of development proposed for the borough in the London

Plan; it is considered that the transport policies should significantly mitigate against impacts of air quality and on SA Objective 14 as the policies seek to reduce dependence on the private vehicle, encourage walking and cycling, improve public transport capacity and accessibility and reduce the need to travel. It is considered that the transport section of the Plan could be improved to recognise the benefits of electric vehicle use on air quality and climate change mitigation. In response to previous SA work, reference to electric vehicle charging points is made in section 2 of the Plan. Maximising use of the River Thames is also encouraged in terms of SA Objective 14 and policy T5 is supported.

- 5C14.18 A major cause of poor air quality from vehicles comes from stationary taxis parked in taxi ranks with their engines running. If there are existing ambient air quality issues in an area proposed for a new taxi rank, air pollution problems may be exacerbated. While this is more of a behavioural change problem that should be addressed through education and awareness raising; it might be appropriate to consider air quality impacts arising from proposals involving new taxi ranks. For example taxi ranks in enclosed spaces such as railway arches may cause significant localised poor air quality. The concern was highlighted in previous SA work. The policy response was that adverse air quality arising from taxi ranks is covered by policy T9(b). This states that 'proposals will not be permitted where they would cause unacceptable harm to residential amenity, or highway safety or operation'. As currently worded, it is considered that air quality issues could arise outside of residential areas. It is recommended that either 'environmental quality' is listed in clause (a) or the word 'residential' is removed from clause (b).

SA Recommendation: More positive effects for air quality will result if new taxi ranks need take account of amenity outside of residential areas.

Council response: Agreed, the words 'or wider amenity' have been included in policy T9(b).

Environment and open space policies

- 5C14.19 Code for Sustainable Homes and BREEAM assessment tools include categories on pollution which may assist in improved air quality. The policy also provides for living roofs and walls which help to improve local air quality. Higher Code and BREEAM standards resulting from previous SA recommendations are further supported with respect to achieving SA Objective 14.

Trees policy Q10

- 5C14.20 Policy Q10 has been improved in response to previous SA recommendation to encourage planting of additional trees in new developments and therefore more appropriately meets targets set out in Table 4 to meet the objective. Previously the policy sought only to protect existing trees rather than encourage new provision. Increasing tree numbers in the borough helps improve air quality through carbon sequestration as well as contribute to climate change adaption and mitigation. New planting will help reduce the heat island affect and will cool ambient air temperatures. Similarly policy Q9 on landscaping supports maximised opportunities for greening which will result in similar beneficial effects on air quality and climate change as well as flood management. Green infrastructure helps improve air quality by filtering particulates (notable PM10). It is considered these policies will result in significant positive effects on the objective.

Places and neighbourhoods policies PN1 – PN11

- 5C14.21 The policy for Waterloo should assist in tackling poor air quality by the promotion and improvement in capacity and accessibility of public transport, loss of Hungerford car park to an new area of open space, reducing the need to travel (i.e. mixed use developments including accommodation, employment, community services and facilities) and improvements to public realm and open space including permeability to Waterloo Station. These measures seek to improve air quality, however high levels of fine particles (PM10) and Nitrogen Dioxide (NO2) may still remain given the levels of growth proposed and taking into account previous efforts in implementing the Air Quality Action Plan, that have not resulted in significantly decreased roadside and kerbside levels of Nitrogen Dioxide, particularly in central locations.
- 5C14.22 Policy PN2 provides for a new district centre comprising of mixed use development which again aims to reduce the need to travel. The policy also promotes an improved transport experience through increased capacity of public transport infrastructure, improved walking and cycling environments, and simplified road junctions and crossings. These measures are supported, and will help to ensure that the new development and increased population growth expected for the Vauxhall area does not result in deteriorated air quality on baseline conditions provided they are delivered. Annex 2 suggests that implementation of Vauxhall rail station improvements to lengthening platforms is uncertain as details of funding are not known. More positively, projects for increasing capacity of both the underground and overground are considered deliverable (funding secure) or have been completed already. However, the area does still suffer from poor air quality. PM10 and NO2 are very high around the Vauxhall gyratory. The policy states improvements to this area will include working towards the removal of the gyratory. This should result in more positive effects with a better balance between cars, pedestrians and cyclists, however there is some uncertainty whether this will be appropriately delivered, and thus result in improved air quality in this area. In the short term the area is unlikely to result in improved air quality due to emissions associated with new construction (lorry trips, use of heavy vehicles).
- 5C14.23 Policy PN3 on Brixton seeks public transport, walking and cycling improvements. It also seeks to augment opportunities to meet needs locally by strengthening Brixton's town centre role and promoting mixed use development, thereby reducing the need to travel for some. Such measures should help to tackle poor air quality issues. However, development of Popes Road temporary ice rink site to include town centre car parking will encourage vehicles into the town centre. The former multi-storey car park on Pope's Road was closed in 2009 for various reasons and it was not used at capacity anyway. Provision for loss of this car parking has been provided in Buckner Road. Any car parking provision promoted by the policy should be minimised taking into account air quality, health impacts, public realm, walkability of the area and locational issues including the exceptional PTAL level of the centre. At the very least car parking should not result in a net increase of parking spaces already currently provided for the town centre. The inclusion of car parking proposed for Brixton town centre means that negative effects on achievement of SA Objective 14 are likely.
- 5C14.24 As part of improved public transport provision and interchange; the policy proposes a new London Overground station at Brixton and an appropriate replacement for the role and function of the former Cross River Tram. Therefore, while the policy promotes the transport hierarchy, delivery of these projects is uncertain as no funding has been identified for either projects and the latter project is not currently included in TfL's business plan.

- 5C14.25 Policy PN4 for Streatham supports accessibility and use of public transport, walking and cycling through improvements to public transport facilities, the public realm and measures to reduce the impact and dominance of road traffic. It also states that car parking will be sought appropriate to the nature and scale of development. It may be argued that these aspirations conflict each other. However policy response to this from earlier SA concerns is to recognise particular issues with car parking in specific town centres and that such car parking sought will not be in excess of maximum standards set out in Policy T7. Policy PN7 also states car parking will be sought for West Norwood.
- 5C14.26 Previous SA concerns on impacts on air quality in Clapham that may result from policy seeking to 'improve vehicle movements' have been taken on board. Now the policy emphasises improvements to the environment for pedestrians and cyclists, but also improved linkages through the town centre. It is considered that this more appropriately addresses SA Objective 14, and other SA Objectives such as SA Objectives 2, 11) and positive effects are more likely to result.
- 5C14.27 Policies PN6 Stockwell and PN8 Kennington/Oval also seek improvement of traffic and environmental conditions for pedestrians and cyclists. Improved traffic flow, including for public transport is likely to improve fuel efficiency and help minimise pollution, thereby contributing to improved air quality. Policy PN10 for Loughborough Junction should result in improved local air quality as it seeks to ensure that all necessary services and amenities are within close walking distance of every home; that the number of walking and cycling routes in the area is maximised; and the number of people driving through the area is reduced, particularly those travelling under two miles. As previously highlighted, it is further recommended in terms of SA Objective 14 that policy PN11 on Upper Norwood seeks to improve environmental conditions for cyclists as well as pedestrians. This has been accepted and policy amended accordingly.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

- 5C14.28 All sites in Table 53 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 14.

Table 52: Significance criteria for SA Objective 14: Air Quality

| Positive | Negative |
|--|--|
| <ul style="list-style-type: none"> • Site is within an Air Quality Management Area • Allocation supports sustainable transport and travel. • Promotes planting of vegetation and wildlife habitats. | <ul style="list-style-type: none"> • Site not within an AQMA. • Allocation encourages private car use. • Reduces vegetation and wildlife habitats. • Propose land use may contribute to air pollution (e.g. polluting industry). |

TABLE 53: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 14: AIR QUALITY

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|--|--|---|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | | Compliance with Local Plan policies particularly transport policies |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | - Site is within an Air Quality Management Area - Allocation supports sustainable travel through school travel plan | - proposed land use as a school may contribute to air pollution through vehicle journeys associated with school drop off and pick up | Compliance with Local Plan policies particularly transport policies |
| 3 | Vale Street Depot, Vale Street SE27 | - Site is within an Air Quality Management Area - Allocation supports sustainable travel through school travel plan | - allocation encourages private car use (reuse and recycling centre and possible housing too due to poor public transport accessibility) - proposed land use as a school may contribute to air pollution through vehicle journeys associated with school drop off and pick up | Compliance with Local Plan policies particularly transport policies |
| 4 | New Park Road SW2 | - Site is within an Air Quality Management Area - Allocation supports sustainable travel through school travel plan | - proposed land use as a school may contribute to air pollution through vehicle journeys associated with school drop off and pick up | Compliance with Local Plan policies particularly transport policies |
| 5 | Elizabeth House, York Road SE1 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | | Compliance with Local Plan policies particularly transport policies |
| 6 | Shell Centre, 2-8 York Road SE1 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | | Compliance with Local Plan policies particularly transport policies |
| 7 | Waterloo Station, Waterloo Road SE1 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | | Compliance with Local Plan policies particularly transport policies |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | | Compliance with Local Plan policies particularly transport policies |
| 9 | ITV Centre and Gabriel's Wharf, Upper | - Site is within an Air Quality Management Area | | Compliance with Local Plan |

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| | | | | |
|----|--|--|---|---|
| | Ground SE1 | - Allocation supports sustainable transport and travel. | | policies particularly transport policies |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | - allocation promotes vehicle use (fire engines) | Compliance with Local Plan policies particularly transport policies |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | - if used as school, potential contribution to air pollution due to school drop off and pick up | Compliance with Local Plan policies particularly transport policies |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | | Compliance with Local Plan policies particularly transport policies |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | | Compliance with Local Plan policies particularly transport policies |
| 14 | Somerleyton Road SW9 | - line of plane trees on grass verge protected - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | | Compliance with Local Plan policies particularly transport policies |
| 15 | Popes Road SW9 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | - allocation promotes private vehicle use (town centre car parking) | Compliance with Local Plan policies particularly transport policies |
| 16 | Brixton Central (between the viaducts) SW9 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | | Compliance with Local Plan policies particularly transport policies |
| 17 | 'Your New Town Hall' SW2 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | | Compliance with Local Plan policies particularly transport policies |
| 18 | 286 - 362 Norwood Road SE27 | - Site is within an Air Quality Management Area - Allocation supports sustainable transport and travel. | - allocation promotes private vehicle use (car parking) | Compliance with Local Plan policies particularly transport policies |

Summary of Local Plan policies and site allocations

5C14.29 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, projected population growth, and the housing targets assigned in the London Plan to be delivered in Lambeth; it is considered that the Local Plan policies seek to improve air quality.

Table 54: Summary assessment of effects of Local Plan on air quality

| Assessment of effects of the Local Plan on SA objective 14 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|--|-------|---|--|--|
| To improve air quality | ?/+ | <p>Much development and growth is proposed for the borough during the plan period. This inevitably is going to place additional pressures on air quality. It is considered that the policies seek to mitigate these effects for improved air quality, for example, by reducing the need to travel; discouraging private vehicle use; encouraging more walking and cycling and use of improved public transport; provision for living roofs and walls; protection of existing trees and open space and; planting of new trees and greenery. However it is unclear whether effects can be mitigated completely or whether air quality will be improved significantly given recent and current attempts and current baseline conditions. It is noted that the London Plan IIA concludes the air quality policy 'sets out a robust approach to reducing air pollution' and the combination of London Plan policies together 'contribute positively to air quality'.</p> <p>Much development (including site allocations) is proposed in existing town centres and around public transport nodes and this has positive effects for the objective through good accessibility to public transport and reduced need for private vehicle use. Some town centres seek additional car parking areas which will likely encourage car use and thus may have a negative impact (perhaps more localised) on the objective. There is a significant drive to improve green infrastructure in the borough, and coupled with lower car ownership in Lambeth and more electric vehicle use; it is considered that positive effects are possible for air quality.</p> <p>Much needed improvements to some public transport infrastructure remain uncertain due to identified funding gaps (for example addressing overcrowding on Northern Line, Vauxhall overground station improvements, and a new station at Brixton and/or Loughborough Junction for the London Overground). The northern line extension may not be delivered before occupation of sites in the Opportunity Area. Also, despite the whole Borough being a designated Air Quality Management Area and previous efforts implementing the Air Quality Action Plan, there has not been a significant decrease in roadside and kerbside levels of Nitrogen Dioxide.</p> | <p>Public transport infrastructure projects (e.g. Northern Line extension or the new station at Brixton) is unlikely to be delivered (if at all) until in the mid to long-term at the earliest and for some projects is dependent on securing funding.</p> <p>Efficient management of air quality in the Borough, given the projected population increase and level of development proposed necessitates the delivery of clean and efficient transport.</p> <p>Measures to improve localised air quality such as increased greenery will likely be evident in the medium term as developments are completed and soft landscaping, tree planting and living roofs / walls become established.</p> <p>Improvements of the Vauxhall gyratory which currently has poor air quality may be evident in the longer term as decisions are yet to be made how the gyratory is improved for best effect.</p> | <p>Permanent.</p> <p>Temporary adverse air quality effects associated with heavy vehicle movements and dust will be likely in the short and medium terms as developments are constructed. Such effects will be addressed in the Construction Logistics Plan required by policy T8 Servicing.</p> |

Recommendations for monitoring likely uncertain effects

5C14.30 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § Percentage of residents with health problems related to air pollution/quality
- § Improvement of air quality at the monitoring stations around the Borough
- § Annual update of Infrastructure Schedule

5C15. EDUCATION AND SKILLS

5C15.1 This section of the SA relates to the sustainability performance of the Local Plan against:

§ Objective 15: To maximise the education and skills levels of the population.

5C15.2 To achieve objective 15 plan policies should improve opportunities and facilities for formal, informal and vocational learning (including volunteering) for all ages; contribute to up-skilling and to meeting skills shortages; and promote healthy, sustainable living.

Relevant Policy Objectives

National Level

5C15.3 *Skills for Growth – the national skills strategy (2009)* is a strategy for economic growth and individual prosperity. It identifies that skills are a key part of our plan for economic recovery, and an urgent challenge. Commitments in the strategy include investing in skills in the sectors on which future growth and jobs depend, and empowering individuals through skills giving people ‘consumer choice’ and better information about courses.

5C15.4 *National Planning Policy Framework 2012* states that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Policies should also guard against the unnecessary loss of valued facilities and services.

Regional Level

5C15.5 Policies in the *London Plan (2011)* seek to ensure appropriate education facilities are provided for local needs from pre-school to higher and further education institutions and community learning facilities; protect and enhance social infrastructure; and improve opportunities for all, including local employment, skills development and training opportunities.

Baseline conditions and existing issues

5C15.6 The number of school places in the borough is currently insufficient to meet future demand, both at secondary and primary level. It is the Council’s aspiration to provide a year 7 place for 80% of pupils leaving primary school. There is a current shortage of primary school places to meet existing demand, and further places will be required to meet projected future population growth. The estimated current and future demand has identified particular shortages in Brixton, Norwood and Streatham. Demand for school places in Lambeth is increasing as the population grows. In some areas demand has risen by 40 per cent in just four years (Housing Strategy 2012).

5C15.7 Current provision includes 14 Secondary Schools, 62 Primary Schools, five Special Schools and 27 Children’s Centres in the Borough.

5C15.8 In 2011, 80% of pupils in Lambeth achieved 5+ A* - C Grades in GCSE’s which is higher than both the inner London average (78.9%) and national average (79.5%) (Lambeth Council 2012).

- 5C15.9 Forty six percent of Lambeth residents have degree level qualifications which is 10th highest nationally and high than Inner London (44%). This is up from 41% in 2001 (Census 2011). Conversely, 14% of Lambeth residents have no qualifications at all, which is amongst the lowest proportions nationally (Census 2011). This is down from 20% in 2001 and is also less than Inner London average (15.8%).
- 5C15.10 Lambeth has the second highest ratio of young people who are not in education, employment or training (NEET) of the Central London First Boroughs (Southwark 9.9%, Lambeth 8.3%) (Housing Strategy 2012).
- 5C15.11 Lambeth has a number of further and higher education establishments including King's College and Lambeth College (largest provider of adult and community learning in the Borough). King's College aims to be one of the top six universities in the UK, and one of the top twenty-five internationally. It plans to grow by 3,000 students over the next five to ten years. Its estate comprises five main campuses, of which four are wholly or partly in Lambeth. These are at Waterloo, St Thomas's, Guy's and Denmark Hill (which straddles the border with Southwark and is closely associated with King's College Hospital).
- 5C15.12 The Waterloo campus is particularly critical and includes four buildings. King's wishes to expand to another site in the area and would like to see its Waterloo campus develop as an educational and cultural quarter linked to the South Bank. The shortage of good quality, affordable and local student housing has become an issue recently. An additional 1,000 beds are required to meet projected demand at King's. In addition to buying in accommodation from student housing providers, King's is looking at its own assets to provide accommodation, particularly for overseas and post-graduate students (King's College London Strategic Plan 2006 – 2016).

Likely evolution without the Plan

- 5C15.13 Education facilities will continue to be provided in the absence of the Local Plan. However, they may not be located in the best areas from a spatial planning perspective. For example, the Core Strategy allows for schools on employment land (both within and outside KIBAs) and the Local Plan seeks to remove this exception within KIBAs. To meet expected demand, school provision in the Borough needs to be expanded and sites in the Borough should be identified for this purpose in areas to meet expected demand. Similarly, in the absence of the Local Plan, development may occur at a rate and in locations that far exceeds social infrastructure, which will result in unsustainable communities and environments.

Assessment of Policies

- 5C15.14 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 15, education and skills. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.
- 5C15.15 The following policies have been screened as having potential for significant effects on this objective.

D1 – Delivery and monitoring
D2 – Presumption in favour of sustainable development
D3 – Infrastructure
D4 – Planning obligations
H7 – Student housing

ED2 – Business uses outside KIBAs
ED6 – Town centres
ED14 – Employment and training
SI1 – Safeguarding existing community facilities
SI2 – New or improved community facilities

SI3 – Schools
EN2 – Local food growing
PN1 – Waterloo
PN2 – Vauxhall
PN3 – Brixton
PN4 – Streatham
PN5 – Clapham

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

Delivery and monitoring policies

5C15.16 Overall, it is considered that policies D1 - D4 should result in significant positive effects on SA Objective 15, particularly policy D4 which seeks planning obligations to fund infrastructure including education, health, libraries, cultural and community provision.

Housing policy H7

5C15.17 The loss of existing student accommodation in the Borough is resisted through policy H7, unless adequate replacement provision is provided or it is demonstrated that that facility no longer caters for future or current needs. In line with London Plan policy the approach to policy H7 is that the demands for student housing does not compromise capacity to meet the need for conventional housing, especially affordable housing or family housing, or undermine policy to secure mixed and balanced communities. Proposals should also not result in loss of employment land or floorspace. Student housing should form part of mixed use developments, and be linked to a higher education institution. Overall, it is considered that the policy provides for student housing, delivered in a sustainable manner (close to amenities, transport and is affordable), promotes healthy sustainable living, and improves opportunities and facilities for formal learning. However, it is noted that the Local Plan contains strong provisions for the delivery of conventional dwellings and employment generating land / floorspace, and therefore difficulties in identifying appropriate sites for student housing may arise. Paragraph 5.50 states that anticipated growth in numbers of full time higher education students is expected. While existing student accommodation will be protected, it is uncertain whether Local Plan policies taken as a whole will positively meet future demand.

Economic Development policies ED2, ED15

5C15.18 To help meet demand for much needed school places policy ED2 (which seeks to protect business use land outside of KIBAs) makes exception to allow loss of such land for D1 use, which includes non-residential education and training centres, as well as other facilities that help skill the population such as libraries, museums, and public halls which often accommodate informal and vocational learning for all ages. It is considered that this exception to policy ED2 allows for significant positive effects to result in terms of achieving SA Objective 15.

5C15.19 The level of development proposed for the Borough provides opportunities for jobs and apprenticeships in construction and ancillary sectors. Policy ED14 seeks to maximise such opportunities, reduce unemployment and provide training schemes to upskill the population which, if implemented effectively, should result in significant positive effects for local residents, and the attainment of SA Objective 15.

Social infrastructure policies S1 – S3

5C15.20 Policies S1, S2, and S3 should result in significant positive effects on SA Objective 15 as they seek to maintain an adequate supply of land for education and community uses. New or improved premises will need to be delivered in a sustainable manner, including being accessible to the community, not result in adverse impacts (hours of operation, noise, traffic etc), and accommodate shared use of premises where possible. Large residential schemes and comprehensive housing estate regeneration

will also need to provide appropriate provision for social infrastructure where this cannot be met through existing facilities.

- 5C15.21 Annex 2 identifies projects for new primary or secondary schools for the Borough. There are some identified funding gaps which could threaten delivery of new school places. Contingency plans have been prepared and include expanding provision of existing schools, although depending on how this is delivered; may result in adverse impacts on children's learning through larger class numbers. Accordingly, it may be argued that deliverability and effectiveness of additional school places is uncertain.

Open space and environment policy EN2

- 5C15.22 Policy EN2 on food growing provides opportunities for informal learning and volunteering for all ages. It also provides opportunities to learn about the benefits of healthy lifestyles, and offers opportunity for social interactions, all of which contribute to achieving SA Objective 15. Allowing food growing on non-residential schemes (in response to previous SA recommendation) results in more positive effects for the objective (as well as other SA Objectives such as 2 (health), 3 (access to services), 7 (liveability)).

Places and neighbourhoods policies PN1 – PN11

- 5C15.23 Many of the places provided for in these policies, particularly Waterloo, Vauxhall, Brixton, Streatham and West Norwood promote significant levels of development, and accordingly provide opportunities for new job creation, both during and after construction. Implementation of policy ED14 will help ensure that such opportunities, especially those related to construction, are available to local residents, and provide positive prospects for up-skilling, apprenticeships and local employment.
- 5C15.24 Policy PN1 provides for higher education facilities in Waterloo, as well as accommodation opportunity for students of St Thomas' hospital and King's College. Mixed use development is promoted with appropriate supporting community, service and shopping facilities.
- 5C15.25 Policy PN2 for Vauxhall states that supporting infrastructure necessary to allow growth or mitigate the impact of development should be provided. Annex 2 of the Local Plan identifies a funding gap for the new primary school proposed for Vauxhall, Nine Elms, Battersea (or NEV) Opportunity Area that may threaten the timely provision of the school. The contingency plan is to expand other schools in the area to meet demand; however, it also states this would not support the intensive population growth expected. A local social enterprise through which community members play a lead role is proposed, and this could create opportunities for formal, informal and vocational learning for all ages.
- 5C15.26 In some respects policy PN3 for Brixton appropriately provides for SA Objective 15 through recognising an appropriate provision to meet the need for additional school places, and supporting community and educational uses. The Infrastructure Schedule identifies that Lambeth College in Brixton will be undergoing a redevelopment to meet future demand of the facility. While there is a funding gap, the College make clear they are committed to the redevelopment of its Brixton site and are reviewing their overall plans in order to achieve this aim. Increases in student numbers are not expected however; as Lambeth College mostly caters to students already living in the area.
- 5C15.27 Policy PN4 makes provision for community facilities, particularly alongside new development. Policy PN5 for Clapham seeks to retain the old Clapham library for community use which will likely provide opportunity for a form of learning provision

on-site.

- 5C15.28 Education and other community uses are encouraged as part of the development proposed for West Norwood town centre and the policy positively provides for identified education need in the area. Start up accommodation for small businesses is proposed and this will increase the likelihood for meeting skills shortages / up-skilling and vocational learning. A youth provision and Neighbourhood Resource Centre at Norwood Hall should also result in significant positive effects in terms of SA Objective 15.
- 5C15.29 Policy PN10 for Loughborough Junction seeks to improve the sustainability and liveability of the area by ensuring the all necessary services and access to employment are within close walking distance of every home. Policy PN11 also seeks transport improvements and supports vibrant arts and creative industries in the area which also help meet the objective.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

- 5C15.30 All sites in Table 56 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 15.

Table 55: Significance criteria for SA Objective 15: Education and Skills

| Positive | Negative |
|---|--|
| <ul style="list-style-type: none"> Site allocation actively supports provision of education, training or skills development. | <ul style="list-style-type: none"> Allocation may lead to additional unmet skills or education needs. |

TABLE 56: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 15: EDUCATION AND SKILLS

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|----|--|--|---|---|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | | | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 2 | 47 – 51 Acre Lane, and land rear of Sudbourne Road SW2 | - Site allocation actively supports provision of education, training or skills development (school). | | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 3 | Vale Street Depot, Vale Street SE27 | - Site allocation actively supports provision of education, training or skills development (school) | | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 4 | New Park Road SW2 | - Site allocation actively supports provision of education, training or skills development (school) | | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 5 | Elizabeth House, York Road SE1 | | - Allocation may lead to additional unmet skills or education needs. | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 6 | Shell Centre, 2-8 York Road SE1 | | - Allocation may lead to additional unmet skills or education needs. | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 7 | Waterloo Station, Waterloo Road SE1 | | | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | | Allocation may lead to additional unmet skills or education needs. | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | | Allocation may lead to additional unmet skills or education needs. | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | | Allocation may lead to additional unmet skills or education needs. | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | - Site allocation may support provision of education, training or skills development (potential location). | - if new primary school not provided, allocation may lead to additional unmet skills or education needs | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | | Allocation may lead to additional unmet skills or education needs. | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | | Allocation may lead to additional unmet skills or education needs. | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 14 | Somerleyton Road SW9 | - allocation includes social enterprise / business start up spaces | Allocation may lead to additional unmet skills or education needs. Potential loss of current temporary | Compliance with Local Plan policies e.g ED14, S1 – S3 |

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| | | | | |
|----|--|---|--|---|
| | | | education use | |
| 15 | Popes Road SW9 | | Allocation may lead to additional unmet skills or education needs. | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 16 | Brixton Central (between the viaducts) SW9 | | | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 17 | 'Your New Town Hall' SW2 | | Allocation may lead to additional unmet skills or education needs. | Compliance with Local Plan policies e.g ED14, S1 – S3 |
| 18 | 286 - 362 Norwood Road SE27 | - allocation includes start up accommodation for small businesses | Allocation may lead to additional unmet skills or education needs. | Compliance with Local Plan policies e.g ED14, S1 – S3 |

Summary of Local Plan policies and site allocations

5C15.31 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is possible that the Local Plan could have positive effects (albeit with an element of uncertainty) on the improving the existing baseline (to the extent possible by Planning) of education and skills levels of the population.

Table 57: Summary assessment of effects of Local Plan on education and skills

| Assessment of the effects of the Local Plan on SA objective 15 | Score | Justification of Score | Timescale and probability | Permanent or temporary |
|--|-------|---|--|--|
| To maximise the education and skills levels of the population | +/? | <p>In so far as planning policy is able to influence education and skills levels; it is considered that overall the Local Plan will result in positive effects on SA objective 15. Employment and training policy ED14 should help maximise the number of local people working on development / construction sites during the plan period.</p> <p>Positively, existing schools and community facilities will be safeguarded. Also some site allocations, town centres, and economic development policies make provision for the establishment of more creative and cultural industries thereby increasing the likelihood local people can find local work.</p> <p>Local food growing areas can facilitate informal learning for all ages and promote healthy sustainable living.</p> <p>However, there is some uncertainty on how and when additional school places will be delivered particularly as funding gaps have been identified in the Infrastructure Schedule. There is also some uncertainty on whether sufficient student housing will be delivered. Also the level of development proposed in the site allocations may lead to additional unmet skills or education needs</p> | <p>Existing schools and community uses are already safeguarded.</p> <p>As the population grows in response to completed developments there will likely be increased strain on school places. The contingency plans identified for temporarily expanding existing schools to accommodate growth is a likely reality in the short term. In the longer term, as funding is identified it is hoped that additional schools will be delivered to support increased demand.</p> <p>Up-skilling and apprenticeships will be evident in the short term and throughout the plan period as development is constructed and delivered.</p> | <p>Permanent and temporary</p> <p>While apprenticeships and jobs associated with construction of new development may be temporary (up to occupancy of developments); skills learnt during this time will be transferable to other areas / employment opportunities.</p> <p>Expansion of existing schools is only a temporary measure to resolve school place demand.</p> |

Recommendations for monitoring likely uncertain effects

5C14.32 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § Annual update of Infrastructure Schedule
- § Number of additional school places provided
- § Percentage reduction of young people not in education, employment or training

5C16&18. LOCAL ECONOMY AND TACKLING WORKLESSNESS

- 5C16.1 This section of the SA relates to the sustainability performance of the Local Plan against:
- § Objective 16: Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses; and
 - § Objective 18: Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.
- 5C16.2 To achieve objectives 16 and 18 plan policies should improve the resilience of business and the economy, e.g. through supporting indigenous and local business, diversification, corporate social responsibility, accommodating low income workers, supporting and driving the marketplace; support employment opportunities in the most deprived areas and groups and stimulate regeneration; enable people to live better for a given income by reducing their need for paid goods and services; contribute to sustainable tourism; improve accessibility to employment, especially for local people; improve employment opportunities among Black, Asian, Ethnic and Minority groups; protect local employment land and uses; tackle the causes of worklessness; and provide additional housing near places of work.

Relevant Policy Objectives

National Level

- 5C16.3 The *National Planning Policy Framework 2012* makes clear that the Government is committed to securing economic growth in order to create jobs and prosperity and that the planning system does everything it can to support sustainable economic growth. Investment in business should not be overburdened by the combined requirements of planning policy expectations

Regional Level

- 5C16.4 Chapter 4 of the *London Plan (2011)* contains economic policies for London. Policies support mixed use developments and redevelopments of office space to improve competitiveness, including office based employment growth and floor space. Policies also support planned, monitored and managed release of surplus industrial land (Lambeth Borough is encouraged in the London Plan to adopt a more restricted approach to transfer of industrial land to other uses), and the support and enhancement of provision for arts, culture and entertainment.
- 5C16.5 The *Mayors Economic Development Strategy 2010* highlights the importance of extending opportunity to all Londoners and outlines actions to:
- tackle worklessness and get more Londoners into work
 - address the root causes of low skills
 - promote equality and tackle deprivation
 - ensure more effective education, training and employment support for all
 - help people get into work, stay in employment and progress in their career
 - provide more personalised support and improve delivery.

Baseline conditions and existing issues

- 5C16.6 There are around 10,000 businesses in Lambeth of which 75% have fewer than five employees. Over 99% of businesses in the borough are Small and Medium Enterprises.
- 5C16.7 Fourteen percent of Lambeth residents in employment work in professional, scientific and technical activities; 7.4% work in administration and support service activities; 2% work in manufacturing; and four percent in construction. Twenty percent of those in employment work in associate profession and technical occupations (Census 2011). Conversely, five percent of working age population has never worked, less than Inner London at seven percent (Census 2011).
- 5C16.8 There is evidence that ethnic minority groups are over-represented among NEETs (young people not in education, employment or training), and those with low skills, low wages and among the unemployed. The unemployment rate for ethnic minorities is 17%, based on Annual Population Survey results for April 2009 – March 2010. This is 10.5 percentage points higher than the unemployment rate for white residents (6.5%) and higher than the BME unemployment rate across London (13.6%). However, Lambeth's ethnic minority employment (61%) is higher than the London average (58.1%) (Lambeth Council 2010).
- 5C16.9 The Borough suffers from relatively high rates of unemployment. Lambeth rate of unemployed for October 2012 was 5.6% of the population, this represents 11, 830 residents and is 1.4 percentage points higher than the London average of 4.2%. The current employment rate for the disabled in Lambeth is 46.3% compared to the not disabled which is 78.6% (Lambeth Council 2010). Amongst job seekers, 31% have no qualifications (Lambeth Community Fund Report 2010).
- 5C16.10 There are no strategic industrial locations in Lambeth and the borough's industrial areas are made up of Locally Significant Industrial Sites which are identified as Key Industrial Business Areas (KIBAs). The 28 KIBAs cover 47.9 hectares, ranging in size from 0.09 hectares (Lion Yard) to 7.28 hectares (West Norwood Commercial Area). There is a total of 387,995 square metres of commercial floorspace within Lambeth's KIBAs. KIBAs within the borough are performing well and whilst there has been an increase in vacant floorspace the overall proportion of vacant commercial premises has remained the same. Most KIBAs in the borough continue to have high occupancy levels (KIBA Survey 2012).
- 5C16.11 Commercial development completions in 2010/2011 were in various respects at or near an all time low since 2005/2006 when monitoring started. Gross overall completions were at the second lowest total ever including B1a (offices) and B8 (warehousing) with no B1c (light industry) or B2 (general industry) completions.
- 5C16.12 In terms of overall retail and leisure floorspace, Streatham is the largest town centre in the borough with almost 80,000 square metres of retail and leisure floorspace. There has not been a significant decline in overall floorspace in the town centre since 2002 however there has been a 15% decline in D2 (leisure) uses during this period.
- 5C16.13 Brixton is the borough's second largest centre and the only other major town centre. There has been an increase in the total amount of town centre floorspace between 2002 and 2011 of 8%. The amount of A1 floorspace in particular has increased by almost 15% during this period.

Likely evolution without the Plan

- 5C16.14 It is important that the Borough protects land used for employment uses. The provisions of the Core Strategy provide this protection however; in the absence of the Local Plan the Core Strategy is likely to be considered out-of-date and/or inconsistent with the NPPF. KIBAs and land in business use outside of KIBAs may be lost to other land uses that may not be appropriate in the wider local context.

Assessment of Policies

- 5C16.15 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objectives 16 and 18, local economy and tackling worklessness. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.
- 5C16.16 The following policies have been screened as having potential for significant effects on this objective.

| | |
|--|--|
| D1 – Delivery and monitoring | ED14 – Employment and training |
| D2 – Presumption in favour of sustainable development | SI2 – New or improved community facilities** |
| D3 – Infrastructure | T1 – Sustainable travel |
| D4 – Planning obligations | T2 – Walking |
| H7 – Student housing** | T3 – Cycling |
| ED1 – Key Industrial and Business Areas (KIBAs) | T4 – Public transport infrastructure* |
| ED2 – Business uses outside KIBAs | T5 – River transport* |
| ED3 – Large offices | T8 – Servicing* |
| ED4 – Work-live development | T9 – Mini-cabs, taxis and private hire vehicles* |
| ED5 – Railway arches | EN4 – Sustainable design and construction* |
| ED6 – Town centres | Q17 – Advertisement panels and hoardings* |
| ED7 – Evening and food and drink uses | PN1 – Waterloo |
| ED8 – Public Houses | PN2 – Vauxhall |
| ED9 – A2 uses* | PN3 – Brixton |
| ED10 – Local centres and dispersed local shops* | PN4 – Streatham |
| ED11 – Visitor attractions, leisure, arts and culture uses | PN5 – Clapham |
| ED12 – Hotels and other visitor accommodation | PN6 – Stockwell |
| ED13 – Markets | PN7 – West Norwood |
| * SA 16 only | PN8 – Kennington / Oval |
| | PN9 – Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

** SA 18 only

Delivery and monitoring policies

- 5C16.17 It is considered that policies D1 – D4 should result in significant positive effects on the local economy and tackling worklessness. In particular, Policy D1 seeks to support initiatives such as town centre partnerships, business improvement districts and other business networks and business led or neighbourhood management schemes in order to promote centres, attract inward investment and public realm improvements. Site specific planning obligations and the Community Infrastructure Levy (CIL) will be applied to developments to help deliver necessary infrastructure. Such infrastructure is necessary for the ongoing successful and sustainable future of new development, however the levy rate (£s per square metre) needs to be fair and carefully formulated to ensure new development continues and remains viable to developers. The Draft CIL Charging Schedule is currently available for public consultation and it is expected that the Lambeth CIL will be adopted by summer 2014. The draft CIL proposes affordable housing and buildings in operational use for charitable purposes to be exempt from CIL. This will help achieve positive impacts

with regards to a number of SA Objectives, including health, equalities, housing, liveability, and may also contribute towards tackling worklessness by incorporating affordable housing in mixed use schemes.

Housing policies

- 5C16.18 The level of housing proposed for the Borough will help improve the local economy, by increasing the opportunity for the provision of local employment (e.g. construction) and training as well as increased spend from additional households. However, delivery of housing, particularly by private house builders remains somewhat uncertain due to current economic climate, and therefore housing delivery is considered uncertain in the short term. Indeed in 2011/12 there was 2150 outstanding unimplemented planning permission for residential units. It is considered the student housing policy indirectly contributes to tackling worklessness by providing affordable accommodation for people studying. Provision of housing may also enable people to live closer to their places of work which could help secure the supply of labour, reducing the time lost to travel, increasing productivity and supporting the economy.

Economic development and town centre policies

- 5C16.19 Policies ED1, ED2 and ED3 should result in significant positive effects for the local economy and tackling worklessness. The policies seek to maintain a stock of business and employment generating land in the borough, to help ensure local people have access to local jobs, employment and professional development. Protecting existing employment land in strategic areas will likely attract new enterprises to the Borough and will serve as a platform for future employment and economic growth. Mixed use development is also supported on sites outside of KIBAs where existing quantity of B use class is replaced. This will also assist in both improving the local economy and tackling worklessness by retaining or increasing employment generating land and offering residents opportunity for well-located accessible employment where living closer to work is possible. Large scale mixed use development will also attract new enterprises to the Borough.
- 5C16.20 The new permitted development rights for change of use from B1(a) to C3 residential may result in loss of employment generating land / floorspace, depending on the outcome of the Council's current judicial review application (which is yet to be decided at time of writing).
- 5C16.21 In response to previous SA recommendations, policies have been strengthened to ensure that when loss of employment land is proposed, marketing of the site has been active and continuous over one year.
- 5C16.22 Policy ED4 recognises that combined work-live units contribute to the range of homes and the range of business premises in the borough and can offer a number of benefits including reduction in traffic, more efficient use of land, minimising business start-up costs and supporting flexible working; and it is anticipated that significant positive effects on the objectives should result.
- 5C16.23 Policy ED5 use of railway arches creates opportunities for ingenious use of land and may attract new business growth in particular sectors appropriate to the unique environment, for example in the creative and cultural industries.
- 5C16.24 Policies ED6 and ED10 will likely result in significant positive effects on SA Objectives 16 and 18. The policies seek to ensure town and local centres are lively and viable places for both consumers and business investors. Active frontages on ground floor level are required and the retail function of primary shopping areas will

be maintained. Local shops, marketing areas and areas of specialist shopping are protected through policy ED6 and will help to support indigenous local business and diversification. Creating and delivering attractive and active town centres will help attract more inward investment to such centres and the wider Borough.

- 5C16.25 The drive to maintain retail provision is strong. Primary shopping areas are identified for each town centre, and in these areas retail provision (A1) is encouraged. Proportions of desired retail units are specified for each town centre in the places and neighbourhoods policies, recognising that the blanket approach to town centres of the Draft Local Plan is not appropriate (in response to consultation and SA recommendations). Ensuring adequate retail provision (A1) in primary shopping areas and local centres is considered important for economic and social reasons. On the whole, and taking into account the ratio of primary shopping area within total town centre boundaries as illustrated on the Proposals Map, and the social benefits of successful town centres with good proportions of retail offer; it is considered that policies ED6 and ED10 should result in significant positive effects on the local economy and tackling of worklessness.
- 5C16.26 It is considered that the policies (ED6 and ED10) significantly contribute to liveability and prosperous local economy, particularly to provide local residents with daily needs and services. In response to previous SA recommendation residential provision is provided for on appropriate sites of town centres and above shops. This will likely help support local shops and services and therefore positively contributes to SA Objective 16. It is recommended that residential above ground floor (regardless of ground floor use – i.e. not limited to just shops) would result in more positive effects for town centres and the local economy. This has been agreed and changed under SA Objective 6 Housing.
- 5C16.27 Policy ED7 on evening economy and food and drink uses supports such use in town centres and the Lower Marsh / The Cut CAZ frontage. The policy seeks to manage adverse impacts on local amenity arising from these uses. Like A1 retail, desired proportions of A3/A4/A5 uses have been established for each town centre, rather than the blanket approach included in the Draft Local Plan. It is considered that this town/local centre approach is much more appropriate to the needs to each centre and therefore will more likely result in significant positive effects on SA Objective 16.
- 5C16.28 New Local Plan policy ED8 seeks to retain public houses, recognising their economic role contributing to employment generation (SA Objective 18), the local economy and vitality of the area (SA Objective 16). Changes of use, redevelopment and/or demolition of a public house would only be permissible if certain criteria were met (for example, marketing, value to local community).
- Policy ED9 seeks to avoid A2 uses dominating centres. The outcome of this will likely be more diverse town centres of enhanced vitality and viability that attract more inward investment and new businesses to local areas, including both larger high street chains and smaller individual shops and boutiques. It is considered that this policy significantly seeks to improve in a positive way the social and environmental performance of business.
- 5C16.29 Policies ED11 and 12 recognise the contribution of visitors and cultural uses to the local economy. These policies also enable improved access to employment generating activities for local residents, thereby contributing to worklessness in the borough and should result in positive effects.
- 5C16.30 Markets are supported in the Borough through policy ED13 and could help contribute

to tackling worklessness. New markets are only supported where they do not harm existing shopping facilities or markets located in town centres, further enhancing and safeguarding the town centre retail offer and positively contributing to SA Objective 16.

- 5C16.31 Policy ED14 on employment and training should result in significant positive effects on SA Objective 16 and 18, particularly for young and/or unemployed residents of the borough.

Social infrastructure policy S2

- 5C16.32 Policy S2 will help tackle causes of worklessness as it exceptionally allows for the use of residential accommodation for childcare use or nursery provided specific tests are met, and community facilities are supported elsewhere (but not within KIBAs) where the building is accessible (as well as other criteria). Inadequate local childcare can be a cause of worklessness and therefore it is considered that positive effects should result on SA Objective 18.

Transport policies

- 5C16.33 Transport policies have very real potential to create significant positive effects for prosperity and economic growth in the Borough, as well as providing opportunity for rewarding and satisfying employment. Easy and accessible transport links both within the Borough and to outside the Borough are considered essential for improved prosperity and economic performance of Lambeth as well as attracting more inward investment. Lambeth has a variety of assets that attract people from outside the Borough, including tourism and educational facilities. Therefore, maintenance and improvement of transport infrastructure in the Borough is important for the attainment of SA Objectives 16 and 18 and considered critical for the Boroughs development. The policies should also assist in improving the social and environmental performance of businesses in the Borough (particularly policies T3, T6, and T8).
- 5C16.34 Uncertainties in securing funding and delivering public transport improvements such as a new station at Brixton and / or Loughborough Junction providing access to London Overground has potential to adversely impact on the local economy and effective achievement of SA Objectives 16 and 18.

Environment and open space policies

- 5C16.35 Policies EN3 (low carbon and renewable energy) and EN4 (sustainable design and construction) policies in particular will help improve the social and environmental performance of business. Some may argue that the policies cause additional financial burden to developers through the need to incorporate low carbon technologies, achieve higher Code for Sustainable Homes and BREEAM levels and provision of living roofs and walls. However, it is considered that such costs are offset by the social and environmental benefits they provide, as well as reduced energy costs from running the business. Fundamental to the stability of the economy is ensuring a secure energy supply. A secure energy supply enables businesses to function, whilst also reducing reliance on fossil fuels, and thereby mitigates climate change (improving social and environmental performance of business). In order to reduce costs to the developer, measures provided by policies EN3 and EN4 need to be incorporated into the very early stages of concept and design. Demand for 'green' goods and services, may stimulate new job opportunities in the borough.

Quality of built environment policies

- 5C16.36 High quality well designed commercial buildings are attractive to prospective investors and therefore implemented appropriately, the policies will likely result in significant positive effects on the economic growth of the Borough, but also

contribute towards a more satisfying environment for workers.

5C16.37 Advertisement panels and hoardings will be carefully managed through policy Q17, and renewal of existing advertisements and hoardings will be resisted where they have an adverse impact, particularly affecting heritage or in recognised regeneration areas. Tall buildings in appropriate locations provide additional business premises opportunities which should also contribute to the local economy. Overall, it is considered that all design policies will result in positive effects on the local economy.

Places and neighbourhoods policies

5C16.38 Significant positive effects on both SA Objectives 16 and 18 are expected from the Waterloo policy (PN1). The policy seeks to support employment opportunities for local residents and promote new training opportunities. The range of cultural and social infrastructure proposed will enable people to live better for a given income. The policy seeks to maintain the area's diverse employment offer relating to its status as an international centre for culture and arts; a pre-eminent international, domestic and local tourist/ leisure and entertainment area; and as a major location for offices, hotels, healthcare and higher education.

5C16.39 As another Opportunity Area, Vauxhall offers substantial benefits for regenerating the local area to maximise benefits for local economy and employment generating activities. Development of the new district centre is expected to create 8,000 new jobs, including construction jobs, which will provide a boost to the local economy and help tackle worklessness of local residents by providing the unemployed with opportunities to be involved in the transformation of Vauxhall (example of implementing policy ED14). The new district centre will provide a range of facilities and services, including at least 25% ground floor A1 retail offer, all of which will contribute to attaining SA Objectives 16 and 18. However, such development also requires necessary social and physical infrastructure to support its growth, and such infrastructure will at least be part funded by developers through CIL and planning obligations. Overall, it is considered that regeneration of the Vauxhall area will result in significant positive effects on the local economy and improved employment rates.

5C16.40 Policy PN3 for Brixton will result in significant positive effects on SA Objectives 16 and 18 as it protects existing employment uses and seeks new opportunities such as in creative arts, theatre, cultural industries and green business. Mixed use development is encouraged and support is provided for markets and affordable business space for smaller organisations and individuals. Given the exceptional public transport accessibility of Brixton town centre, together with its breadth of shopping, food and drink, and entertainment offer, and in response to previous SA recommendation; provision for hotel accommodation is now supported in the policy. This will make a further positive contribution to the Brixton local economy and wider borough economy. Delivery of further improvements to the public transport system (for example new London Overground station and replacement Cross River Tram would maximise positive impacts (social, economic and environmental) even more, however these improvements currently remain uncertain due to funding constraints.

5C16.41 Significant positive effects for the local economy and workless population should result from policy PN4 for Streatham. Regeneration that re-establishes its place as a destination for retail, leisure, hotels and commerce is supported by the policy. The policy contains strong retail provision requirements of at least 60% ground floor units in primary shopping areas and no more than 25% food and drink uses. This, together with reducing the length of the shopping centre aims to help improve vitality, viability and local distinctiveness. Public realm improvements also seek to attract new business investment to the area.

- 5C16.42 Clapham town centre has reached saturation point for food and drink uses, and therefore no further pubs, bars and hot food takeaways are permitted for this centre. In addition, at least 50% of ground floor units in the primary shopping area need to be in A1 retail use to help redress the balance of retail and nonretail uses in the centre. In time, this should result in a stronger local economy with improved social and environmental business performance (more retail needs being met within the centre and within the borough). The policy supports creative, visual and performing arts and cultural sector, thus contributing to a more diverse economy. It is unclear how the extent of worklessness can be addressed given it is a smaller centre, however there is provision for street markets and community innovation, and the centre does provide a number of jobs in hospitality.
- 5C16.43 Stockwell is a small district centre also, and is unlikely to deliver significant benefits to the local economy, although the policy does seek to encourage commercial, civic and other employment uses. It is unclear how worklessness will be tackled and it is expected that most residents of the local area will need to travel out of Stockwell for employment. Retail is encouraged, whereby no fewer than 50% of original ground floor units in primary shopping area should be in A1 use.
- 5C16.44 Policy PN7 for West Norwood promotes retail-led mixed use development. Training and investment schemes that benefit the whole centre are encouraged. A commercial area has been identified where commercially-led redevelopment is proposed to increase the range, quality and flexibility of business premises and encourage a variety of employment uses. No fewer than 50% of ground floor units should be in A1 use, and the policy seeks control of A5 uses by allowing no more than 15% and no more than 2 in 5 consecutive units across the centre as a whole.
- 5C16.45 Policy PN8 for Kennington / Oval seeks to improve the quality and extent of shopping and other appropriate town centre uses within the centre. The centre includes Kennington Business Park which is a KIBA and is therefore protected for its employment and business use.
- 5C16.46 It is considered that development in line with policies PN7 and PN8 should provide access to employment for some local people although significant improvements are not likely to be expected. Causes of worklessness have generally not been addressed in great depth.
- 5C16.47 Herne Hill, Loughborough Junction and Upper Norwood policies seek to provide retail and appropriate town centre uses. Like other small district centres, Herne Hill and Upper Norwood seek no less than 50% ground floor units in A1 retail and no more than 25% in A3/A4/A5 food and drink use. The policy for Loughborough Junction states that access to employment should be within close walking distance to every home. Provided this is deliverable; this will help tackle worklessness in the local area. Creative industries are sought for Loughborough Junction, and use of railway bridges as a catalyst for change, if implemented appropriately, should result in a boost for the local economy of the area. The policy indirectly seeks to tackle causes of worklessness by ensuring necessary services (like childcare) are within walking distance of homes. However, it is uncertain how effective the policy will be on tackling worklessness in this particular area known for its high levels of deprivation.
- 5C16.48 Overall, it is considered that the approach requiring different percentages of retail (i.e. no fewer than 60% in major centres; no fewer than 50% in smaller centres) and food and drink uses for different centres will likely result in significant positive effects for SA Objectives 16 and 18, but also on social SA Objectives such as health,

liveability, services and travel. Nevertheless it should also be pointed out that there is some element of economic risk to this. It could be argued that control of ground floor town centre uses (e.g. A use classes) should be managed through market demand. However, the policies have been developed based on a robust evidence base specific for the borough, and it is therefore considered that this risk to the local economy is low.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C16.49 All sites in Table 59 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objectives 16 and 18.

Table 58: Significance criteria for SA Objectives 16 and 18: Local Economy and Tackling Worklessness

| Positive | Negative |
|---|--|
| <ul style="list-style-type: none"> • Provides appropriate, accessible land to support employment. • Actively supports the development of value added and low impact activities • Supports existing town and local centres. • Protects existing employment sites. • The allocation supports the provision of local employment in the borough. • The allocation supports provision of affordable childcare. | <ul style="list-style-type: none"> • Site poorly located with respect to services, facilities and accessibility of labour or customers. • Undermines or threatens existing centres or employment sites. • Development of the site may undermine provision of local employment or affordable childcare across the borough. |

TABLE 59: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVES 15 & 18: ECONOMY AND TACKLING WORKLESSNESS

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|---|------------|----------------------|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - Supports existing town and local centres. - The allocation supports the provision of local employment in the borough. | | |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | <ul style="list-style-type: none"> - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. | | |
| 3 | Vale Street Depot, Vale Street SE27 | <ul style="list-style-type: none"> - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 4 | New Park Road SW2 | <ul style="list-style-type: none"> - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Allocation supports nursery places P provides appropriate, accessible land to support employment | | |
| 5 | Elizabeth House, York Road SE1 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 6 | Shell Centre, 2-8 York Road SE1 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 7 | Waterloo Station, Waterloo Road SE1 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. | | |

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| | | <ul style="list-style-type: none"> - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site (although part of KIBA may be lost to residential) | Part of existing KIBA may be lost to residential use | Replacement employment should be maximised. |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 14 | Somerleyton Road SW9 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 15 | Popes Road SW9 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 16 | Brixton Central (between the viaducts) SW9 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |
| 17 | 'Your New Town Hall' SW2 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. | | |

| | | | | |
|----|-----------------------------|---|--|--|
| | | <ul style="list-style-type: none"> - Supports existing town and local centres. - Protects existing employment site | | |
| 18 | 286 - 362 Norwood Road SE27 | <ul style="list-style-type: none"> - Provides appropriate, accessible land to support employment. - The allocation supports the provision of local employment in the borough. - Supports existing town and local centres. - Protects existing employment site | | |

Summary of Local Plan policies and site allocations

5C16.50 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is likely that the Local Plan will have significant positive effects on the existing baseline and in providing employment and improving opportunities for prosperity and economic growth in the Borough.

Table 60: Summary assessment of effects of Local Plan on economy and worklessness

| Assessment of effects of the Local Plan on SA objectives 16 & 18 | Score (with recommendations) | Justification of Score | Timescale and probability | Permanent or temporary |
|--|------------------------------|---|--|---|
| <p>Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses</p> <p>And</p> <p>Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.</p> | <p>++/?</p> | <p>On the whole and taking into account the extent planning policy can offer all residents rewarding, well located and satisfying employment; it is considered that the Local Plan will have significant positive effects on these SA Objectives, existing baseline conditions and key sustainability issues on employment and economy as outlined in Table 3. While the Borough does not have London Plan designated Strategic Industrial Land, the Local Plan does seek to maintain its stock of KIBAs and other employment generating and business use land. Policy ED14 seeks to upskill the local population and ensures local jobs, particularly associated with new construction, go to local people. Many of the places and neighbourhoods policies make provision for a range of affordable and flexible workspaces to support local independent retailers and attract a range of different industries. All Opportunity Areas and major town centres (including those close to areas of high deprivation) promote mixed use development and all site allocations support the provision of local employment in the Borough, support existing town and local centres and most provide appropriate, accessible land to support employment.</p> <p>However, there is a small level of uncertainty whether the strong retail drive of town centres will result in significant positive effects in the short term given the current economic climate. There is also some uncertainty on the effect the A2 policy (ED9) may have on the local economy, and also delivery of critical transport infrastructure in a timely manner and its impact on the local economy, attracting inward investment, and improving access for local people to employment opportunities. Uncertainty also exists on how market forces will impact employment rates and the local economy, given current economic hardship.</p> <p>The economy is currently trying to recover from a double dip recession and avoid a triple dip recession. Accordingly development of key sites and areas may be delayed until there is more certainty of the economy at all scales: regional, national, European and global.</p> | <p>Significant positive effects on the local economy will be evident in the short term through opportunities related to construction of new developments, particularly in Opportunity Areas. Significant positive effects will likely continue in the mid to long term as developments are occupied both through occupied business/office space, but also through increased population supporting town and local centres. Redevelopment of other areas may be slower due to the current economic recession. Economic growth in rejuvenated town centres like Brixton and Streatham is likely to be seen incrementally over the plan period with cumulative benefits apparent in the medium to long term. Increases in the number of A1 retail premises will probably correspond to changes in the current recession, and therefore the positive effects on the Borough's economy will likely be evident in the medium term and beyond.</p> | <p>Permanent</p> <p>Temporary effects associated with lack of activity possible while the economy recovers from double dip recession.</p> |

Recommendations for monitoring likely significant and uncertain effects

- 5C16.51 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:
- § Unemployment rates
 - § Number of businesses registered in the Borough
 - § Number of vacant premises in town centres
 - § Annual update of infrastructure schedule
 - § Total amount of additional employment floor-space, by type
 - § Total amount of employment floor-space on previously developed land, by type
 - § Employment land available, by type (measures the amount and type of employment land in the borough)
 - § Total amount of floor-space for 'town centre uses'
 - § Net additional serviced bedrooms (visitor accommodation)

5C17. REGENERATION AND EFFICIENT USE OF LAND

5C17.1 This section of the SA relates to the sustainability performance of the Local Plan against:

Objective 17: 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.

5C17.2 To achieve this objective, plan policies should maximise regeneration benefits to the most deprived areas and communities; promote the efficient, innovative and multifunctional use of land; ensure the provision of adequate quantities and type of public realm; and protect the Borough's soil resource.

Relevant policy objectives

National Level

5C17.3 *National Planning Policy Framework 2012* states that policies should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided it is not of high environmental value. Multiple benefits from the use of land and mixed use development should be promoted. Empty housing and buildings in line with local housing and empty homes strategies should be brought back into residential use.

Regional Level

5C17.4 The *London Plan (2011)* contains a number of policies applicable to regeneration schemes. For example policy 7.9 – Heritage Led Regeneration - states that regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. Similarly open space provision should be included in regeneration schemes.

Baseline conditions and existing issues

5C17.5 The London Borough of Lambeth is a dense urban district that is largely residential in nature. There are designated areas of open space, key industrial and business areas and town centre / major / district shopping designations.

5C17.6 There is currently a number of regeneration projects in the Borough:

- Clapham Old Town;
- Lower Marsh Regeneration Project;
- Streatham and West Norwood High Streets;
- Shell Centre site Masterplan;
- Vauxhall Nine Elms / Battersea Opportunity Area;
- Waterloo Opportunity Area; and
- Future Lambeth projects:
 - Future Brixton;
 - Future Clapham;
 - Future Kennington;
 - Future Norwood; and
 - Future Streatham

5C17.7 The Regeneration Delivery Plan Update 2010 provides further detail on priority projects as well as an update on actions.

Likely evolution without the Plan

5C17.8 In the absence of the Local Plan, regeneration will likely continue however; local specific guidance and detail (relating to a raft of place making measures like design, sustainable transport, accessibility, community facilities etc) will be lacking and as such regeneration may be delivered in a less co-ordinated and less cohesive manner. Development may be brought forward that is not appropriate for the local context (for example overconcentration of student housing or fewer affordable housing).

Assessment of Policies

5C17.9 This section examines the likely significant effects of implementing the proposed Local Plan policies on SA Objective 17 Regeneration and efficient use of land. It reviews policies and discusses the likely effects as well as providing a summary of the likely effects of the whole Plan on the objective. This review takes account of mitigation already included within the Plan.

5C17.10 The following policies have been screened as having potential for significant effects on this objective:

| | |
|---|---|
| D1 – Delivery and monitoring | T7 – Parking |
| D2 – Presumption in favour of sustainable development | T10 – Telecommunications |
| D3 – Infrastructure | EN1 – Open space |
| D4 – Planning obligations | EN2 – Local food growing and production |
| H1 – Maximising housing delivery | EN4 – Sustainable design and construction |
| H2 – Delivering affordable housing | EN5 – Flood risk |
| H3 – Safeguarding existing housing | EN7 – Sustainable waste management |
| H4 – Housing mix in new developments | Q6 – Urban design / public realm |
| H7 – Student housing | Q7 – Urban design / new development |
| H10 – Gypsy and Traveller needs | Q9 – Landscaping |
| ED1 – Key Industrial and Business Areas (KIBAs) | Q17 – Advertisement panels and hoardings |
| ED2 – Business uses outside KIBAs | Q20 – Statutory listed buildings |
| ED3 – Large offices | Q22 – Conservation Areas |
| ED4 – Work-live development | Q26 – Tall buildings |
| ED5 – Railway arches | PN1 – Waterloo |
| ED6 – Town centres | PN2 – Vauxhall |
| ED10 – Local centres and dispersed local shops | PN3 – Brixton |
| SI1 – Safeguarding existing community facilities | PN4 – Streatham |
| SI2 – New or improved community facilities | PN5 – Clapham |
| SI3 – Schools | PN6 – Stockwell |
| T1 – Sustainable travel | PN7 – West Norwood |
| | PN8 – Kennington / Oval |
| | PN9 – Herne Hill |
| | PN 10 – Loughborough Junction |
| | PN11 – Upper Norwood |

Delivery and monitoring policies

5C17.11 Policy D1 ensures the Council will work with a range of partners to explore regeneration opportunities, and that use of brownfield land and vacant buildings are maximised. Developments will be supported by appropriate green, social and physical infrastructure as provided by policies D3 and D4. Delivery of such infrastructure will help ensure efficient use of land and successful regeneration projects. It is likely that policies D1 – D4 will result in significant positive effects on SA Objective 17 as they seek to maximise previously used land, and tackle areas of deprivations (i.e. identified regeneration areas and town centres).

Housing policies

5C17.12 Housing policies promote new housing delivery and estate renewal and regeneration schemes. Proposals that bring back into use long-term empty homes and derelict homes are supported by policy H3. All housing developments will need to incorporate affordable housing provision, and a range of dwelling sizes, which should provide regeneration benefits to deprived areas and communities, particularly for overcrowded households. Policy H10 on gypsy and traveller needs ensures new sites are economically, socially and environmentally sustainable and it is considered that the criteria for new sites seek to maximise benefits for this community. Therefore it is anticipated that significant positive effects on the objective will result.

Economic development and town centre policies

5C17.13 While policy ED1 does not promote the multifunctional use of land in its widest sense (KIBAs), the policy ensures a stock of sites is maintained in the Borough for business and employment generating uses which provide other key social and economic benefits to the Borough and residents. Policy ED2 also seeks to maintain the stock of sites and premises in business use outside of KIBAs, but allows for mixed use development where the existing quantity of B class floorspace is replaced or increased. Accordingly it is considered policy ED2 promotes efficient, innovative and multifunctional use of land.

5C17.14 Generally, the Local Plan seeks to protect sites and premises currently in business or employment generating use. Change of use or redevelopment is generally supported where certain tests are met and supported by marketing evidence and independently validated viability assessment. One requirement is that sites are actively marketed over a continuous one year period. It is considered that this is an efficient approach to land use management, while seeking to meet economic objectives for the Borough.

5C17.15 Policy ED4 of work-live development states that change of use of work-live accommodation to residential use will not be permitted. This seems inconsistent with other policies (particularly ED2 and ED3, and housing delivery objectives) as the policy makes no allowance for marketing evidence that demonstrates no demand for the work element of the work-live accommodation. It also may be considered as an inefficient use of land, particularly if there is no demand for the work component of an existing work-live site, when there are other issues facing the borough such as supply of larger family size homes. This concern was raised in previous SA work and the response was that the approach is intentional as historically changes of use from work-live have resulted in an incremental loss of employment uses to residential.

5C17.16 It is considered that use of railway arches is an efficient use of land resource. Town centre policies also support efficient use of land by providing for a range of uses. In response to previous SA recommendations, residential use above shops is now provided for in town centres offering a more efficient use of land resource. It also better complements places and neighbourhood policies that provide for mixed use development in their respective town centres. Diversifying the retail sector, encouraging small shops and promoting town centre development are likely to contribute positively to SA 17.

Social infrastructure policies

5C17.17 Policies S1 – S3 should result in positive effects on SA Objective 17. Existing community premises are to be safeguarded for the most efficient use of the premises addressing changing needs and priorities of the community. Proposals for large residential schemes and comprehensive estate regeneration will need to ensure appropriate provision for social infrastructure and local shops, which will help maximise regeneration benefits to the most deprived areas and communities. New or improved community premises need to be flexible, adaptable and sited to maximise shared community use of premises. The schools policy promotes the shared use of schools for wider community use, which also demonstrates a means to improving efficiency in land use.

Transport policies

5C17.18 Good accessibility across the Borough, particularly by public transport, walking and cycling is an important part of successful regeneration of areas as it provides accessibility to local services and facilities, employment and education opportunities as well as health benefits. Transport policies also provide for adequate provision of public realm for walking and cycling which should maximise regeneration benefits to deprived areas and communities of the Borough. Parking policy T7 seeks to maximise efficient use of land by requiring car parking provided as part of shopping / leisure development in Opportunity Areas and town centres to service the whole area / centre rather than just the new development. Similarly, flexible shared use of car parking should be provided in mixed use developments.

Environment and open space policies

5C17.19 Open space policies should result in significant positive impacts on regeneration and efficient use of land. Provision of (and access to) open space is necessary for healthy communities, but also plays important multifunctional roles such as flood management, biodiversity, improved air quality, food growing, leisure and sport. For these reasons, open space in its own right is an efficient use of land and protection of existing open space is critical. Policy EN1 also seeks to create areas of new open space, particularly in areas of open space deficiency and therefore open space will form an important component of regeneration projects. Policy EN2 promotes food growing spaces and appropriate sites and is no longer confined to residential developments.

5C17.20 Code for Sustainable Homes and BREEAM assessment tools provide credits for building reuse and Brownfield development. All regeneration will need to comply with the requirements of policy EN4 on sustainable design and construction, and should help maximise regeneration benefits in deprived areas and communities, particularly through improved health outcomes and lower energy bills from improved energy efficient design and construction. The policy also promotes use of living roofs and walls which provide a range of benefits, both to occupants of buildings and the environment through improved air quality and biodiversity, demonstrating multifunctional use and benefits of land and buildings. The policy also seeks to improve the soil resource by requiring adequate remedial treatment of any contaminated land prior to development commencing. This also has associated health benefits for construction workers and occupiers of development.

5C17.21 Flood risk policy EN5 seeks to steer development towards areas of lowest flood risk and encourages use of sustainable drainage systems, further demonstrating multifunctional use of land. Policy ED6 on sustainable drainage systems and water management also endorses this approach but also supports water efficiency measures including rainwater harvesting and greywater recycling further ensuring

developments promote efficient use of land. Policy EN7 on sustainable waste management supports the waste hierarchy, which if implemented appropriately will result in reduced quantities of waste to landfill, thereby contributing to protection of soil resource (outside of the Borough).

Quality of built environment policies

- 5C17.22 It is considered that urban design policies on both public realm and new developments should result in significant positive effects on SA Objective 17, particularly in maximising regeneration benefits by ensuring long-lasting gains and provision of adequate quantities and type of public realm. Landscaping of developments should avoid left-over spaces, and this seeks to ensure all land is put to some sort of use, whether useable open space, biodiversity, soft planting or if appropriate food growing.
- 5C17.23 The Local Plan contains policies that seek to bring heritage assets back into viable use and good repair (policies Q18 and Q20). Policy 22 for conservation areas seeks to preserve or enhance the character or appearance of the areas. However, demolition in a conservation area will be supported subject to specific criteria being met. The criteria do not include demonstration that the building cannot be viably enhanced or improved for re-use. This concern was raised in previous SA work and despite its potential to benefit other Local Plan policies (e.g. D1) and SA Objectives (e.g. 13); it has been rejected on the grounds that the policy seeks to retain positive contribution buildings.
- 5C17.24 Tall buildings (policy Q26) can maximise use of the land resource and provide opportunity for multifunctional use of land. Potential adverse effects associated with tall buildings (such as dominance, shading, reduced privacy) need to be managed.
- Places and neighbourhoods policies***
- 5C17.25 Overall, it is considered that the places and neighbourhoods policies should result in significant positive effects on regeneration and efficient use of land. This is because policies seek positive change to previously developed land and existing buildings. However, it should be noted that the policies apply to sites within town centre boundaries, and therefore may not result in direct regeneration benefits to the most deprived communities in terms of where they live, but it is considered that redevelopment of town centres may stimulate regeneration in these other areas. Policies for Waterloo, Vauxhall, Brixton, West Norwood and Streatham provide for taller buildings which offer opportunities for multifunctional and efficient use of land. Policies for Waterloo and Vauxhall promote development in line with their respective Opportunity Area Frameworks and Central Activities Zone (CAZ) designations. While redevelopment of these areas will benefit the borough, it is unlikely to impact directly on the most deprived areas and communities of Lambeth, although public realm improvements particularly for walking and cycling may improve accessibility opportunities and integration with adjacent deprived areas. Conversely, policy PN3 on Brixton town centre focuses on much needed sensitive and sustainable regeneration in an area of high deprivation. The policy supports innovative opportunities, including creative arts and green sectors, and promotes improvements to public realm. This can promote more regeneration of areas by acting as a focal point to attract more investment. In focusing development in the existing centre and on previously developed land it should contribute to the protection of the Borough's soil assets and land resource.
- 5C17.26 Mixed use developments are proposed for all major centres and public realm improvements are provided for in all of the policies PN1- PN11. As highlighted above, such improvements may help stimulate regeneration in other adjacent deprived

areas. Policy PN5 on Clapham, policy PN8 on Oval both seek retention (and reuse) of specific buildings. Policies PN6 for Stockwell and PN7 West Norwood include improvements to housing estates which will benefit this deprived area and community. Loughborough Junction is one of the most deprived areas in the Borough, and the policy seeks to address this through positive regeneration that results in clear identity, increased sense of pride, high quality design, improved transport links, and using the railway bridges as a catalyst for change.

Assessment of Sites

Likely significant effects of implementing Site Allocations, taking into account mitigation

5C17.27 All sites in Table 62 (below) have been assessed against the significance criteria below to determine significant effects on the attainment of SA Objective 17.

Table 61: Significance criteria for SA Objectives 17: Regeneration and Efficient Use of Land

| Positive | Negative |
|---|---|
| <ul style="list-style-type: none"> • Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. • Site located within London Plan Area for Regeneration. • Allocation promotes high standards of sustainable design and construction, including provision/protection of public realm and the borough's soil resource. | <ul style="list-style-type: none"> • Greenfield site which is sensitive in terms of ecology, agriculture or/and amenity. • Allocation involves regeneration or development proposals that are not within London Plan Area for Regeneration (where potential exists unmet on areas for regeneration elsewhere in the Borough). |

TABLE 62: ASSESSMENT OF SITES AGAINST CRITERIA FOR SA OBJECTIVE 17: REGENERATION

| # | Site | Strengths | Weaknesses | Potential Mitigation |
|---|--|---|--|---|
| 1 | Land north and south of and including 10 Royal Street (Founders Place) | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm | | |
| 2 | 47 – 51 Acre Lane, and land rear of Sudburne Road SW2 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm | - possible soil contamination issues from previous use as petrol station | - soil testing and cleansing (policy EN4) |
| 3 | Vale Street Depot, Vale Street SE27 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - Allocation makes provision for land contamination remediation | - possible soil contamination issues from waste use | Policy EN4 |
| 4 | New Park Road SW2 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. | | |
| 5 | Elizabeth House, York Road SE1 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area | | |
| 6 | Shell Centre, 2-8 York Road SE1 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area | | |
| 7 | Waterloo Station, Waterloo Road SE1 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area | | |
| 8 | Cornwall Road Bus Garage, Cornwall Road SE1 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area | | |
| 9 | ITV Centre and Gabriel's Wharf, Upper Ground SE1 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm | | |

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|----|--|---|--|--|
| | | - site within London Plan Opportunity Area | | |
| 10 | 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area | | |
| 11 | Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143 – 161 Wandsworth Road (odd) SW8 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area | | |
| 12 | Land bounded by Wandsworth Road to the west, Parry Street to the north, Bondway and the railway viaduct to the east SW8 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area | | |
| 13 | Plot bounded by Parry Street, Bondway and 7 – 93 Wandsworth Road SW8 (Vauxhall Island Site) | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm - site within London Plan Opportunity Area | | |
| 14 | Somerleyton Road SW9 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm | | |
| 15 | Popes Road SW9 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm | | |
| 16 | Brixton Central (between the viaducts) SW9 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm | | |
| 17 | 'Your New Town Hall' SW2 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm | | |
| 18 | 286 – 362 Norwood Road SE27 | - Site on Brownfield land. Does not impact on areas of high amenity value or any ecological designations. - allocation includes provision / protection of public realm | | |

Summary of Local Plan policies and site allocations

5C17.28 Overall, and taking into account the criteria outlined in the Scoping Report of the SA objectives, it is considered that the Local Plan seeks efficient use of land resource and stimulates regeneration that maximises benefits to the most deprived areas and communities.

Table 63: Summary assessment of effects of Local Plan on regeneration

| Assessment of effects of the Local Plan on SA objective 17 | Score (with recommendations) | Justification of Score | Timescale and probability | Permanent or temporary |
|---|------------------------------|--|--|------------------------|
| To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings. | ++ | <p>Overall it is considered that the Local Plan provides the policy framework to allow regeneration that maximises deprived areas and communities and improves efficiency in land use through re-use of existing buildings and land.</p> <p>The Plan promotes multifunctional use of land in many areas through mixed use developments. Regeneration of underused or vacant areas is an efficient use of the land resource. All places and neighbourhoods policies promote public realm improvements and while these are proposed for town centres it is considered that such improvements can also stimulate regeneration of wider areas. Public realm improvements will also result in improved accessibility of the wider area, and thereby benefit wider communities including most deprived areas/communities. Specific policies targeting more deprived areas for example Brixton and Loughborough Junction seek to stimulate sensitive regeneration, which will result in wide ranging benefits to for local communities.</p> <p>All site allocations are for brownfield land, and some also seek to reuse / bring back into more efficient use existing buildings.</p> | <p>Regeneration in Opportunity Areas is already occurring and will likely continue into the long term.</p> <p>Regeneration of other places and neighbourhoods and site allocations will likely occur in short term for some sites (that already have planning permissions) and between mid to long term relative to the economic climate.</p> <p>Smaller scale improvements, for example minor public realm improvements may already be evident in some areas or otherwise will likely be evident in the short term.</p> | Permanent. |

Recommendations for monitoring likely significant effects

5C17.29 It is recommended that the following indicators are used to monitor the effects of the Local Plan identified in the SA:

- § Number of existing vacant or dilapidated / derelict buildings brought back into use
- § Number of regeneration projects completed in deprived areas.

6 SUMMARY AND CONCLUSIONS

The Local Plan

- 6.1 A new Local Plan for Lambeth has been prepared, and incorporates the existing Core Strategy 2011 and new detailed planning policies for development management and sites. The vision, strategic objectives and spatial strategy of the Core Strategy has not changed (other than factual updating), as they are recently developed and adopted. Accordingly previous SA analysis, including reasonable alternatives on the spatial strategy, spatial vision, strategic objectives and most strategic policies remains relevant. However, a limited number of strategic policy areas in the Core Strategy have been reviewed to ensure compliance with the National Planning Policy Framework (March 2012) and the London Plan 2011 and to reflect recent updates to the council's strategies for housing, economic development and infrastructure delivery, plus new work on Brixton and Vauxhall.
- 6.2 The Local Plan sets out the spatial strategy, long term spatial vision, strategic objectives and policies for development, and identifies sites for development within Lambeth to cover the period up to 2030/31. It is based on the outcomes of the Lambeth Community Plan 2013-2016 together with other relevant plans, programmes and strategies all of which have implications for development and landuse within the borough.
- 6.3 The London Borough of Lambeth covers an area of about ten and a half square miles, including Waterloo and the South Bank, Vauxhall, the Oval, Kennington, Stockwell, Clapham, Brixton, Loughborough Junction, Herne Hill, Streatham, Tulse Hill, West Norwood and Gypsy Hill. Lambeth is an inner London borough with the north of the borough having a mix of central London activities, while the south of the borough is predominately suburban in character.
- 6.4 The borough has an important historic environment with 62 Conservation Areas covering approximately 30 per cent of the borough including circa 2,500 listed buildings, the vast majority of which are nineteenth century residential dwellings. There are also 17 Archaeological Priority Zones and eight historic Registered Parks and Gardens as well as protected strategic views in the north of the borough of St Pauls Cathedral and the Palace of Westminster which is a World Heritage site.
- 6.5 Lambeth is a very diverse borough ethnically, culturally, socially and economically and this diversity is constantly evolving. It is among the most densely populated local authority in England, with over 11,300 people per km². Lambeth's population is 303,100, which makes it the third largest population in inner London, after Newham (308,000) and Wandsworth (307,000) (Census 2011). The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity.
- 6.6 Public transport provision in the borough is generally good, with 14 overground railway stations evenly spread throughout the borough and nine underground stations predominantly in the north. However, much of Lambeth's public transport infrastructure is currently at or over capacity during peak hours. Access to public transport is good in north and central Lambeth however; residents in Streatham and West Norwood are dependent on rail and bus connections. As Lambeth has the lowest car ownership rate in London, there is even more reliance on public transport.

- 6.7 The Local Plan sets out the strategic approach to planning for development in the borough up until 2030/2031. The spatial strategy assumes a high level of continuous growth over the plan period that seeks to exceed the London Plan target of at least 17,925 additional dwellings in Lambeth over the period 2011-21. The strategy sees retention of all 28 Key Industrial Business Areas as well as maintains a stock of sites and premises in business and employment generating *sui generis* uses. A key difference between the Core Strategy and the new Local Plan is that the exception to the protection of KIBAs to provide sites for schools is no longer available. Affordable housing also remains a priority, but now developments of less than 10 new homes need make a financial contribution towards affordable housing provision. Policies seek to avoid single use areas of student housing; rather criteria has been developed to assess proposals for student housing, being part of mixed use developments and linkage to a college or university are two such criterion.
- 6.8 Changes in the approach to some policies affecting town centres are also proposed. For example, the Local Plan proposes at least 60 percent of primary shopping areas should be shops in major centres (an increase from 50% in the Core Strategy) while smaller district centres retain the 50% provision. The Local Plan also seeks to address concerns that too many betting shops, pawn brokers and money shops are adversely affecting vitality and viability of town centres. A new policy is introduced that seeks to limit these A2 uses in the same way (but with much lower percentage threshold) as food and drink premises are limited. Childhood obesity is tackled through the inclusion of a new policy restricting hot food takeaways within 400m of a primary or secondary school.
- 6.9 Place specific policies that reflect distinctive characters are provided for each of the town and local centres. A tailored approach specific for each individual centre has been developed in response to Draft Local Plan public consultation and SA work. Policies identify the level and type of development appropriate for each centre, including amount of retail, A2 and food and drink uses, building form and height; landuse and public realm. They reflect visions and aspirations of area-based plans (for example Vauxhall SPD, Brixton SPD, Waterloo SPD); the Loughborough Junction policy has been co-produced with the Loughborough Junction Action Group, and the Upper Norwood policy is a direct result of representations received on the Draft Local Plan.
- 6.10 The Local Plan makes provision for new housing that will be of an appropriate housing mix, type and size to enable social inclusion, mixed use communities and the ability to remain in a community for a life time if so desired. Housing will be well designed both individually and with other buildings and the surrounding environment and all developments will need to incorporate affordable housing.
- 6.11 The Plan seeks to deliver community services and facilities that are accessible to everyone. Provision is made for additional community services and facilities to support projected population growth. These will be located and designed to increase accessibility regardless of age, gender, disability, ethnicity or faith and to maintain and improve community, culture, leisure and recreational activities available in the Borough. For example, family housing should normally have direct access to a garden; residential developments for 10 or more children will need to incorporate children's play area; new developments will need to provide sufficient open space, especially in areas currently deficient of accessible open space; and intensive uses such as schools, shops, social infrastructure should be located close to public transport, cycling and pedestrian nodes, reducing the need to travel by car.
- 6.12 The Borough's natural, cultural and archaeological heritage is well provided for in the

Local Plan. Views to the World Heritage Site as well as the vast number of Conservation Areas, listed buildings and their settings, archaeology, and open green spaces will be appropriately protected during the plan period.

- 6.13 Developments will be well designed both socially in terms of social inclusion, accessibility, safety and reduced fear of crime; and environmentally, in terms of water efficiency, waste management and recycling, climate change adaptation, seeking improved air quality and more efficient use of natural resources including land.
- 6.14 On the whole, it is considered that the Local Plan has been produced with the premise of sustainable patterns of urban development actively borne in mind. Sites earmarked for future comprehensive redevelopment are in locations that have potential to facilitate efficient accessibility to both areas within and outside of the Borough.
- 6.15 However, it is considered that deliverability is a key issue for the Local Plan. Significant growth is proposed for the borough, in terms of new housing, new business space as part of mixed use developments and associated population growth. Such growth will only be successful and sustainable if appropriate infrastructure is delivered to support it. For example significant redevelopment in Vauxhall is going to require additional improvements to public transport infrastructure in particular addressing capacity and accessibility. The Northern Line extension to Nine Elms will likely alleviate overcrowding issues on the northern line and provide more accessible public transportation however; it is unlikely this will be delivered before occupation of new surrounding developments. It is probable that population growth will precede any new public transport infrastructure, as developments are completed and occupied. Therefore, there is a potential negative cumulative effect (at least in the short term) of development in Lambeth and neighbouring boroughs, on the capacity on public transport networks, arising from the resultant population increase. Capacity issues in Lambeth could be exacerbated by development in neighbouring areas, for example, further along the Victoria and Northern Underground Lines. This could in turn exacerbate capacity issues elsewhere in central London. It is unclear in the Local Plan how much development can occur if particular infrastructure projects are not delivered.
- 6.16 Reasonable alternatives have been identified for some policies, particularly for policies that had a change in approach from adopted Core Strategy policy. The SA has provided assessment of the reasonable alternatives for each of the Sustainability Objectives.
- 6.17 The sustainability appraisal process during the Local Plan preparation has identified a number of recommendations to maximise positive effects or mitigate negative effects with respect to sustainability objectives. Appendix 2 tabulates all 176 SA recommendations made on the Draft Local Plan alongside Local Plan policies. A further 22 recommendations have been made in this iteration of SA.

Sustainability Effects

- 6.18 Overall, and in so far as planning can influence particular areas, it is considered that the Local Plan provides the policy framework to generally result in positive effects for the borough but as outlined above, deliverability of key infrastructure is a concern weighted with uncertainty. Table 64 shows the sustainability effects of the Plan for each SA Objective.
- 6.19 In considering the concluding remarks to this SA Report, it is considered important to

make reference and reflect on the concluding remarks of the Core Strategy SA (which still holds relevance) and Replacement London Plan Integrated Impact Assessment.

6.20 The IIA report for the London Plan concluded *'overall, the assessment of the draft replacement London Plan has found it to be broadly positive when considered against the 16 IIA objectives'. 'Effects arising from large development projects in London (for example, building more homes) may be positive or negative. These effects may occur as a result of individual developments or cumulatively alongside other developments. The negative effects may include added strain on natural resources (e.g. water resources), pressure to build in areas of high flood risk and an increase in the volume of municipal waste. However, the Plan contains policies to manage and mitigate such effects at the strategic level...Consequently, so far as the London Plan can influence, no significant detrimental effects are anticipated to occur as a result of this draft replacement plan. However, given the level of uncertainty in how some policies will be implemented on the ground it is important to develop an effective monitoring regime to review the impacts and effectiveness of policy over time'* (Replacement London Plan IIA 2009).

6.21 The SA conclusion of the vision and objectives of the Core Strategy is provided below:

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

- *Timing: there is a danger that new infrastructure may follow development and growth (requiring development profits for infrastructure delivery) rather than be in place up front;*
- *Funding (and land required?) for some of the proposed infrastructure schemes has not been identified (e.g. some of the school place provision);*
- *The proportion of open space per resident ('green infrastructure) is likely to reduce as the population increases whilst new open space opportunities are extremely limited.'* (Sustainability Appraisal and SEA of London Borough of Lambeth LDF Core Strategy, 2009)

Table 64: Summary of SA scores

| SA OBJECTIVE | SA SCORE |
|--|----------|
| 1. Ensuring safe communities with reduced crime and disorder | ++ |
| 2. Promoting a healthy borough with better health care services, reduced healthy inequalities and by reducing the causes of ill health | ++ |
| 3. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities | ++/? |
| 4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands. | ? |
| 5. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion. | +/? |
| 6. Ensure everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity. | ++/? |
| 7. To design and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place. | ++/? |
| 8. Improve the quality, attractiveness, character and sustainability of the built environment by improving design quality and protecting open space, valued views and historic assets. | ++ |
| 9. Integrating planning and transport decisions, to reduce the need to travel, reducing reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport. | ++/? |
| 10. To conserve and enhance biodiversity, and bring nature closer to people | ++ |
| 11. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change | +/? |
| 12. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk. | +/? |
| 13. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates. | +/? |
| 14. To improve air quality | +/? |
| 15. To maximise the education and skills levels of the population | +/? |
| 16. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses. | ++/? |
| 17. 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. | ++ |
| 18. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment. | ++/? |

6.22 Recommendations have been made in this SA to improve the sustainability effects of the Lambeth Local Plan. In some cases this has resulted to a change of effect from negative to positive. For example SA Objective 12, whereby flood defences need remain in good condition (original policy inadvertently may have allowed defences to get to poor condition) and ensuring adequate water supply capacity to serve new developments (original policy only concerned sewerage capacity). Previous SA iterations included recommendations that saw an improvement to policy that resulted in a minor positive effect becoming a significant positive effect in the context of the SA Objective (for example, improvements in sustainable design and construction standards likely to result in better health outcomes; clarification that biodiversity generally should be protected rather than just identified areas with biodiversity status, and a net increase in trees which will likely result in significant positive effects of biodiversity as well as other SA Objectives such as health, liveability and sustainability of built environment).

6.23 It is important to note judgements were made taking into account the London Plan directive on the borough in terms of growth; and the extent to which local planning policy can play a part at attaining the SA Objective. For example, the effects of the Local Plan on SA Objective 2 – promoting a healthy borough with better health care services, reduced healthy inequalities and by reducing the causes of ill health – was assessed to result in significant positive effects to the borough. Obviously health is influenced by a number of other, more direct factors and organisations, such as the establishment of hospitals and the NHS; but it was considered that the extent to which the Local Plan can play a role in attaining SA Objective 2, led to significant positive effects.

6.24 For some of the SA Objectives, the Local Plan has resulted in uncertain effects. These primarily relate to deliverability both of necessary infrastructure to support projected growth (especially transport infrastructure such as timing of Northern Line extension, new station at Brixton and/or Loughborough Junction for the London Overground), but also house building, particularly in the short-term as the country struggles out of a double dip recession and avoids a triple dip recession. There is also some uncertainty of the effects policy ED9 on A2 uses and controlling food and drink uses may have on the local economy.

Conclusion

6.25 Taking into account the findings of the SA, it is considered that the Local Plan sets out a positive framework for the future development of Lambeth, in light of the London Plan requirements assigned to the borough. It is considered that the Local Plan successfully achieves a balance between the need to protect the natural environment, with meeting social and economic needs.

6.26 The Local Plan aims to achieve high standards in the quality of development and contains many provisions that seek to mitigate or avoid negative effects on the natural environment. It is considered that the impacts of the scale, type and level of development proposed in the Local Plan will not give rise to significant adverse effects on biodiversity, landscape, historic environment and natural resources, due to the protective nature of policies that avoid or mitigate significant adverse effects.

It is considered that increases in carbon emissions and water use associated with increased population growth need to be weighed and considered against the social and economic benefits that growth brings to the borough. Positive social and economic effects such as improved health and well-being, reduced inequalities, prosperity and wealth, sense of belonging and community identity need to be considered holistically against relative increases in emissions, taking into account mitigation measures that seek to reduce the amount of emissions. Local Plan policies seek to minimise effects associated with projected growth. Generally, the SA found that the Local Plan policies and site allocations aspire to achieve significant positive social and economic effects and avoid or mitigate significant adverse effects.

6.27 Overall, it is considered that the Local Plan provides a spatial and policy framework that is largely in accordance with sustainable development principles, but with a small number of areas where it is uncertain whether sustainability objectives will always be achieved.