

Post-Examination Addendum to Habitats Regulations Assessment and the Sustainability Appraisal: Consideration of Environmental Impact of the Main Modifications to the Lambeth Site Allocations Development Plan Document

1. Introduction

- 1.1. This report has been prepared to assess the Main Modifications to Lambeth's Site Allocations Development Plan Document (SADPD) following its Examination in Public held in March 2025.
- 1.2. This report serves as an addendum to the Sustainability Appraisal (SA). It should be read alongside the full SA Report (SD06a), the SA Scoping Report (SD05), and the SA Addendum (SD06b) published at Regulation 19 stage, and also the post-hearings Reasonable Alternatives paper (SUP 15). These documents are available in the SADPD Examination Library.
- 1.3. This report also serves as an addendum to the Habitats Regulations Assessment (HRA) (SD08) and its Non-Technical Summary (SD09), both published in January 2024. This document is also available in the examination library.
- 1.4. The Main Modifications have been recommended by the appointed Planning Inspector and are necessary to ensure the SADPD meets the tests of soundness set out in the National Planning Policy Framework (NPPF).
- 1.5. This addendum report has been undertaken in accordance with the requirements of:
 - The Planning and Compulsory Purchase Act 2004 (as amended)
 - The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations)
 - Conservation of Habitats and Species Regulations 2017
 - Relevant guidance from the National Planning Practice Guidance (NPPG)

1.6. This assessment concludes that, as modified, the SADPD continues to contribute positively to Lambeth's sustainable development goals. Considered against the SADPD as a whole, the Main Modifications are not considered to lead to any significant effects that have not already been identified. Therefore, the SADPD is considered to contribute toward sustainable development, and no additional mitigation beyond that already identified is required.

2. Habitats Regulations Assessment of the Main Modifications

2.1. Following a review of the proposed Main Modifications, this addendum confirms that the changes introduced are minor in nature and do not materially affect the conclusions of the previous Habitats Regulations Assessment.

2.2. Key considerations are as follows:

- No new development sites have been added.
- No substantial changes to the quantum or scale of development are put forward.
- No new habitats are identified or created as a result of the modifications.
- All existing sensitive habitats are located at a substantial distance, and remain unaffected.
- The Main Modifications do not introduce new policies or proposals that would trigger additional pathways for impact.
- The assessment finds no likely significant effects, either alone or in combination, on any designated Natura 2000 or Ramsar sites.

2.3. On this basis, the conclusions of the previous Habitats Regulations Assessment are considered to still apply – that the SADPD will not have any likely significant effects or impacts on the integrity of any European site.

3. Consideration of Main Modifications against SA framework

- 3.1. This Addendum applies the same appraisal framework, objectives, and methodology set out in the Regulation 19 SA Report, specifically as presented in Section 4: SA Framework. The purpose is to ensure that the proposed Main Modifications are assessed for their likely significant effects on environmental, social, and economic sustainability objectives.
- 3.2. The scope of this Addendum is confined to the Main Modifications only. No changes have been made to the SA baseline or overall methodology. Additional Modifications are also not considered, given these are very minor in nature and are not considered to have any material impact on the SA scoring.
- 3.3. Table 1 provides a summary of Main Modifications for each site allocation. Relevant SA framework objectives have been identified, and the SA scoring has been revisited to ensure this remains accurate. The table also confirms whether the changes are likely to have any significant impact on the SA, and whether any mitigation or further assessment is required – the conclusion is that the modifications are not expected to produce any significant effects, and therefore no additional mitigation is required.
- 3.4. Given the scale of changes proposed under the main modifications, the council does not consider it necessary to consider any further reasonable alternatives at this time. In line with Planning Practice Guidance and SEA Regulations, reasonable alternatives are only required where the plan-maker is considering fundamentally different approaches to meeting the plan's objectives. Further information on the council's approach to reasonable alternatives is set out in its Reasonable Alternatives Paper in the examination library (SUP 15).

Site no.	Main mod no.	Main Modification	Consideration of modification against the SustA framework	Are SA effects significant? Is additional mitigation required
1.	MM01	<p>Alter paragraph 1.16: “An evidence base has been prepared to support the SADPD and explain how design-led optimisation of development capacity has been approached on each of the sites. <u>The approach taken to the sites in the design evidence base documents has informed the parameters of the site allocation policies, but the heights, massing and layouts are considered to be indicative and specific design proposals will be tested on each site as development applications come forward.</u>”</p> <p>Alter paragraph 1.19: “Mayoral Supplementary Planning Guidance and Lambeth Supplementary Planning Documents <u>are a material consideration in planning decisions and</u> will also apply in full to all of the sites included in this SADPD Proposed Submission Version. <u>The development of all sites should be guided by the Lambeth Design Guide SPD, which has informed the indicative approach taken to each site in</u></p>	<p>These modifications modestly support Objectives 7, 8, and 17 by reaffirming design quality, social cohesion, and efficient land use. This is not considered to change the previous scoring for site 1.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

		<u>the design evidence base and the design parameters of each site allocation.</u>		
1	MM02	<p>Within second paragraph, amend as follows:</p> <p>“This will address the currently discordant and incomplete urban realm in this part of the Waterloo Opportunity Area, creating a new place of distinct character, which:</p> <p><u>preserves elements of the setting that sustain</u> preserves <u>or and</u> enhances the setting and Outstanding Universal Value of the Westminster World Heritage Site and <u>the significance of</u> other designated heritage assets;[...]”</p>	This modification modestly supports Objective 8, through bringing the wording on heritage assets in line with the NPPF. This is not considered to change previous scoring for site 1.	No significant effects envisaged. No additional mitigation required.
1	MM03	<p>Remove the following designations from the key:</p> <p>“Location appropriate for tall building – general building height 60m” and “31m AOD Max”.</p> <p>Amend heights shown on the map:</p> <p>Northern section – “60m AOD Max”</p> <p>Middle section – “<u>27m</u> 31m AOD Max”</p> <p>Southern section – “<u>46m</u> 50m AOD Max”</p>	The modification is for information purposes, bringing consistency over measurements used with other allocations. This is not considered to change previous scoring for site 1.	No significant effects envisaged. No additional mitigation required.
1	MM04	Amend second bullet point:	This modification modestly supports Objective 8, through	No significant effects envisaged.

		<p>“Preserve or enhance elements of the setting of the Albert Embankment Conservation Area and the South Bank Conservation Area that make a positive contribution by[...].”</p> <p>Amend fourth bullet point: “Preserve or enhance elements of the setting of the Lower Marsh Conservation Area that make a positive contribution by[...].”</p> <p>Amend fifth bullet point: “Sustain and enhance Preserve the significance (setting) of Lambeth Palace garden by preserving elements of its setting that make a positive contribution.“</p> <p>Amend sixth bullet point: “Sustain and enhance Preserve the significance (setting) of Archbishop’s Park by preserving elements of its setting that make a positive contribution.”</p>	<p>bringing the wording on heritage assets in line with the NPPF. This is not considered to change previous scoring for site 1.</p>	<p>No additional mitigation required.</p>
1	MM05	<p>Amend first paragraph: “The site is includes locations that are appropriate for tall buildings, defined as above 45m in this area, as shown on</p>	<p>These changes are for clarity purposes and do not alter any of the proposed heights but provide</p>	<p>No significant effects envisaged.</p>

	<p>the vision map. The heights on the vision map are dictated by sensitivity in relation to the settings of the Westminster World Heritage Site and County Hall in views from the west. The 60m maximum height ensures development at Beckett House is no higher than its Urbanest neighbour. The 27m 31m maximum height seeks to ensure that the ‘sky gap’ along the edge of the Elizabeth Tower is preserved in Strategic View 27B. Applicants should be mindful of these considerations when developing detailed schemes. Development should integrate the buildings into their context sensitively by:</p> <p>In locations appropriate for a tall building:</p> <ul style="list-style-type: none"> • Achieving a height not exceeding 60m (64m AOD) on the site of Becket House (Local Plan Annex 10 location W7). • Within strategic view 27B, where abutting the protected silhouette of Elizabeth Tower, not exceeding a height of 16m (20m AOD). • Achieving a height not exceeding 46m (50m AOD) on the sites of Stangate House and Canterbury House (Local Plan Annex 10 location W8).” <p>Add new final bullet point to read:</p>	<p>consistency over measurements used. The modification is not considered to change previous scoring for site 1.</p>	<p>No additional mitigation required.</p>
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		<u>“Avoid a canyon-like effect on Lambeth Palace Road, in line with Local Plan Policy Q7 and Policy Q26.”</u>		
1	MM06	<p>Add text to end of first paragraph to read: <u>“Development proposals should take account of London Plan Policy SI 15 and Local Plan Policy T5 relating to river transport where applicable.”</u></p> <p>At the end of third paragraph add: <u>“This must be demonstrated through a suitable off-street servicing strategy.”</u></p>	<p>These changes add clarity in terms of broader London Plan and Local Plan requirements on transport and bring the text in line with other allocations. These modestly support Objectives 1, 3, 9 and 10. This is not considered to change previous scoring for site 1.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
1	MM07	<p>Amend first paragraph to read: "Development should <u>protect existing open space and</u> address existing open space deficiency and access to nature deficiency by meeting the requirements of Local Plan Policy EN1(d). The entrance to Archbishop’s Park should be improved."</p> <p>Add new second paragraph to read: <u>“Development proposals should explore opportunities for new, extended, improved and inclusive access to and from</u></p>	<p>These changes add clarity in terms of broader London Plan and Local Plan requirements on open space and access to waterways. These modestly support Objectives 8, 10 and 11. This is not considered to change previous scoring for site 1.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

		<u>nearby waterways in line with the aims of London Plan Policy SI 16 and Local Plan Policy Q24.</u>		
1	MM08	At end of site allocation, add new row. Left hand column: <u>"Expected delivery timescale"</u> Right hand column: <u>"2030-2035"</u> .	Change adds clarity regarding the site's contribution towards the council's housing trajectory. This is for information purposes and is not considered to change previous scoring for site 1.	No significant effects envisaged. No additional mitigation required.
2	MM09	Amend final sentence: "Both developments offer the potential to enhance the Albert Embankment Conservation Area and should <u>preserve elements of the setting that sustain</u> preserve or <u>and</u> enhance the setting and Outstanding Universal Value of the Westminster World Heritage Site."	This modification modestly supports Objective 8, through bringing the wording on heritage assets in line with the NPPF. This is not considered to change previous scoring for site 2.	No significant effects envisaged. No additional mitigation required.
2	MM10	Alter heights shown on the map: Location A – <u>"36m 40m AOD Max"</u> Location B – <u>"40m 44m AOD Max"</u> Unnamed section between Location A and Location B – <u>"27m 31m AOD Max"</u>	These changes are for clarity purposes and do not alter any of the proposed heights but provide consistency over measurements used. The modification is not considered to change previous scoring for site 2.	No significant effects envisaged. No additional mitigation required.

2	MM11	<p>Amend first paragraph:</p> <p>“Development should sustain preserve or and enhance the Outstanding Universal Value, authenticity and integrity of the Westminster World Heritage Site; and preserve elements of preserve or enhance the setting of the Albert Embankment Conservation Area, the Lambeth Palace Conservation Area, the South Bank Conservation Area and County Hall that make a positive contribution to these heritage assets.”</p>	<p>This modification modestly supports Objective 8, through bringing the wording on heritage assets in line with the NPPF. This is not considered to change previous scoring for site 2.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>
2	MM12	<p>Alter first bullet point:</p> <p>“The 27m 31m maximum height seeks to ensure that the ‘sky gap’ along the edge of the Elizabeth Tower is preserved in Strategic View 27B.”</p> <p>Add new final bullet point to read:</p> <p>“Development should avoid a canyon-like effect on Lambeth Palace Road, in line with Local Plan Policy Q7 and Policy Q26.”</p>	<p>The first changes are for clarity purposes and do not alter any of the proposed heights but provide consistency over measurements used. The second change provides certainty over and Local Plan design expectations, this modestly supports Objectives 8 and 15, overall, this is not considered to change previous scoring for site 2.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>
2	MM13	<p>Add text to end of first paragraph to read: “Development proposals should take account of London Plan Policy SI</p>	<p>These changes add clarity in terms of broader London Plan and Local Plan requirements on transport and</p>	<p>No significant effects envisaged.</p>

		15 and Local Plan Policy T5 relating to river transport where applicable."	bring the text in line with other allocations. These modestly support Objectives 3, 9 and 10. This is not considered to change previous scoring for site 2.	No additional mitigation required.
2	MM14	Amend paragraph 7 to read: "All developments adjacent to a tidal flood defence must ensure the current and future statutory crest levels are maintained as outlined in the Thames Estuary 2100 plan and the condition of tidal wall defences provide a sufficient level of defence in accordance with the design life of the building (e.g. generally 100 years for residential and 50-60 years for commercial 75 years for non-residential), and that a 16 metres setback <u>is</u> safeguarded for inspections, maintenance, future defence raising and potential replacement without increasing flood risk or encroaching on the river channel. <u>A flood risk activity permit (FRAP) will be required from the Environment Agency for activities within 16 metres of a tidal main river or flood defence structure.</u> "	Changes update details on flood risk requirements and tidal breach scenario. This is expected to have a modest positive effect on Objective 13. This is not considered to change previous scoring for site 2.	No significant effects envisaged. No additional mitigation required.
2	MM15	Add new second paragraph to read: " <u>Development proposals should explore opportunities for new,</u>	These changes add clarity in terms of broader London Plan and Local	No significant effects envisaged.

		<u>extended, improved and inclusive access to and from nearby waterways in line with the aims of London Plan Policy SI 16 and Local Plan Policy Q24.</u>	Plan requirements on open space and access to waterways. These modestly support Objectives 8, 10 and 11. This is not considered to change previous scoring for site 2.	No additional mitigation required.
2	MM16	At end of site allocation, add new row. Left hand column: <u>"Expected delivery timescale"</u> Right hand column: <u>"As required, in line with the operational needs of the hospital."</u>	The change adds clarity regarding the site's contribution towards the council's development trajectory. This is for information purposes and is not considered to change previous scoring for site 2.	No significant effects envisaged. No additional mitigation required.
8	MM17	Amend first bullet point to read: " • community/office <u>community or office</u> floorspace at ground floor, providing an active frontage to Stamford Street"	The change provides clarity over how land use requirements should be interpreted and does not alter the intended mix of land uses. This is not considered to change previous scoring for site 8.	No significant effects envisaged. No additional mitigation required.
8	MM18	Amend first paragraph: "Development should sustain and preserve or enhance the significance <u>of heritage assets</u> (including <u>preserving elements of their</u> setting <u>that make a positive contribution to the asset</u>) of heritage assets."	These changes modestly support Objective 8, through bringing the wording on heritage assets in line with the NPPF. This is not considered to change previous scoring for site 8.	No significant effects envisaged. No additional mitigation required.

8	MM19	Amend fourth paragraph to read: <u>“Where possible, a suitable off-street servicing strategy for the commercial, community and residential uses should be demonstrated.</u> Servicing must not be undertaken on Cornwall Road, to protect users of Cycleway C10. Potential for freight consolidation and sharing of servicing requirements with nearby sites should be explored.”	This change brings the text in line with other allocations. This modestly supports Objectives 1, 3 and 9. This is not considered to change previous scoring for site 8.	No significant effects envisaged. No additional mitigation required.
8	MM20	Remove first paragraph as shown: “Where possible the River Thames should be prioritised for transportation of construction materials and waste during construction of the development, and for site waste once operational.”	Site is not considered to have a strong relationship to the river, therefore this change is not considered to affect scoring for site 8.	No significant effects envisaged. No additional mitigation required.
8	MM21	At end of site allocation, add new row. Left hand column: <u>“Expected delivery timescale”</u> Right hand column: <u>“After 2035”</u> .	The change adds clarity regarding the site’s contribution towards the council’s housing trajectory. This is for information purposes and is not considered to change previous scoring for site 8.	No significant effects envisaged. No additional mitigation required.
9	MM22	Add a sixth bullet point to read: <u>“OXO Tower (LB Southwark)”</u>	The change provides additional contextual information, modestly	No significant effects envisaged.

			supporting Objective 8. This is not considered to change previous scoring for site 9.	No additional mitigation required.
9	MM23	<p>Amend second paragraph to read:</p> <p>“By following the building line of Duchy Street there is a specific opportunity to create a new piazza area of activated public realm between the site and the line of trees that marks the boundary with Bernie Spain Gardens.</p> <p>Sensitive redevelopment designed to complement proposals for the neighbouring former ITV site at 72 Upper Ground can also improve the public realm at Queen’s Walk, providing better activation to the river frontage; help increase the permeability of the area; and contribute positively to the townscape along this part of the South Bank.”</p>	The change is considered to improve the deliverability of the scheme, while this may have minor impact on Objectives 3, 8 and 9. The site allocation as a whole performs well against these, therefore there is no change to previous scoring for site 9.	No significant effects envisaged. No additional mitigation required.
9	MM24	<p>Remove shading and reference to “New terrace/piazza” and remove the “New pedestrian route” cutting across the eastern part of the site.</p> <p>Move the “Active frontage” designation to the eastern boundary of the site.</p>	Change related to above modification. While this may have minor impacts on Objectives 3, 8 and 9, the site allocation as a whole performs well against these objectives, therefore no change to previous scoring for site 9.	No significant effects envisaged. No additional mitigation required.

9	MM25	<p>Amend last sentence of paragraph 1 to read: “This may include an element of extra care housing where need is demonstratedThe residential element of development must include C3 housing and may include an element of extra care housing or a nursing home where need is demonstrated.”</p> <p>Add new paragraph to read: <u>"Meanwhile uses will be encouraged in advance of comprehensive redevelopment. Investment to enable this will be supported."</u></p>	<p>The first change provides clarity over interpretation of land use section.</p> <p>The second change will result in short-medium term benefits in regard to Objectives 7, 8 and 16. This is not considered to change previous scoring for site 9.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>
9	MM26	<p>Amend first paragraph: “Development should sustain and preserve or enhance the significance of heritage assets (including preserving elements of their setting that make a positive contribution to the asset) of heritage assets, in particular:[...]”</p>	<p>These changes modestly support Objective 8, through bringing the wording on heritage assets in line with the NPPF. This is not considered to change previous scoring for site 9.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>
9	MM27	<p>Remove sixth bullet point as shown: “Continue the building line set by Duchy Street frontages to the eastern boundary with Bernie Spain Gardens.”</p>	<p>Changes will modestly impact Objective 8, though other policy requirements would help deliver</p>	<p>No significant effects envisaged.</p>

			high-quality and attractive design and public realm. This is not considered to change previous scoring for site 9.	No additional mitigation required.
9	MM28	<p>Add text to end of first paragraph to read: "<u>Development proposals should take account of London Plan Policy SI 15 and Local Plan Policy T5 relating to river transport where applicable.</u>"</p> <p>Amend third paragraph to read: <u>"A suitable off-street servicing strategy for the commercial, cultural, and residential uses must be demonstrated.</u> Potential should be explored for freight consolidation and shared servicing with adjoining and nearby sites. Servicing must be off-street and accessed from Upper Ground."</p> <p>Amend fifth paragraph as shown: "On the eastern side, development should improve the relationship with Bernie Spain Gardens by straightening the path along its western edge and creating good natural surveillance through active ground floor frontages and upper floor fenestration."</p>	<p>These changes add clarity in terms of broader London Plan and Local Plan requirements on transport, and bring the text in line with other allocations. These modestly support Objectives 1, 3, 9 and 10. This is not considered to change previous scoring for site 9.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

9	MM29	<p>Add new second paragraph to read: "<u>Development should be integrated with and complement neighbouring development at 72 Upper Ground; especially in relation to the site interfaces.</u>"</p> <p>Amend final paragraph: "Development should ensure that the amenity value of Bernie Spain Gardens is <u>and Queen's Walk are</u> not diminished by undue overshadowing or enclosure."</p>	<p>Changes would provide clarity over design expectations, supporting objectives 7 and 8. This is not considered to change previous scoring for site 9.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
9	MM30	<p>Amend paragraph 9 to read: "Protect riverside buffer zones and flood defences from further encroachment / development. All developments adjacent to a tidal flood defence must ensure the current and future statutory crest levels are maintained as outlined in the Thames Estuary 2100 plan and the condition of tidal wall defences provide a sufficient level of defence in accordance with the design life of the building (e.g. generally 100 years for residential and 50-60 years for commercial <u>75 years for non-residential</u>), and that a 16 metres setback <u>is</u> safeguarded for inspections, maintenance, future defence raising and potential</p>	<p>Changes update details on flood risk requirements and tidal breach scenario. This will modestly support Objective 13. This is not considered to change previous scoring for site 9.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

		replacement without increasing flood risk or encroaching on the river channel. London Plan Policy SI 12(f) applies. A <u>flood risk activity permit (FRAP) will be required from the Environment Agency for activities within 16 metres of a tidal main river or flood defence structure.</u> "		
9	MM31	Add new second paragraph to read: " <u>Development proposals should explore opportunities for new, extended, improved and inclusive access to and from nearby waterways in line with the aims of London Plan Policy SI 16 and Local Plan Policy Q24. Riparian life-saving equipment should also be provided where necessary and appropriate, in line with Local Plan Policy Q24</u> "	These changes add clarity in terms of broader London Plan and Local Plan requirements on the Thames and use of waterways. This will modestly support Objective 3, 7 and 9. This is not considered to change previous scoring for site 9.	No significant effects envisaged. No additional mitigation required.
9	MM32	At end of site allocation, add new row. Left hand column: " <u>Expected delivery timescale</u> " Right hand column: " <u>After 2035</u> ".	Change adds clarity regarding the site's contribution towards the council's housing trajectory. This is for information purposes and is not considered to change previous scoring for site 9.	No significant effects envisaged. No additional mitigation required.
17	MM33	Amend first paragraph: "Development should sustain and preserve or enhance the significance <u>of heritage assets</u> (including <u>preserving</u>	The change modestly supports Objective 8, bringing the wording on heritage assets in line with the	No significant effects envisaged.

		elements of their setting that make a positive contribution to the asset) of heritage assets including:[...]"	NPPF. This is not considered to change previous scoring for site 17.	No additional mitigation required.
17	MM34	Amend first paragraph: "Heights should step down from no. 336 (23m 31m AOD) south to north on the Brixton Road frontage."	These changes are for clarity purposes and do not alter any of the proposed heights but provide consistency over measurements used. This is not considered to change previous scoring for site 17.	No significant effects envisaged. No additional mitigation required.
17	MM35	Amend third paragraph to read: "Servicing should be accommodated off-street" <u>A suitable off-street servicing strategy for the light industrial, office, community and residential uses must be demonstrated, including</u> potentially using Winans Walk as per the existing arrangement. This must allow servicing vehicles to enter and exit in forward gear. <u>Where land use is linked to last mile distribution/logistics or 'just-in-time', servicing which utilises cargo bikes and minimise the need for vehicle access will be supported.</u>	The changes bring the text in line with other allocations. This will modestly support Objectives 1, 3 and 9. This is not considered to change previous scoring for site 17.	No significant effects envisaged. No additional mitigation required.

17	MM36	At end of site allocation, add new row. Left hand column: "Expected delivery timescale" Right hand column: " 2030-2035 ".	Change adds clarity regarding the site's contribution towards the council's housing trajectory. This is for information purposes and is not considered to change previous scoring for site 17.	No significant effects envisaged. No additional mitigation required.
20	MM37	Amend first paragraph: "Development should sustain and preserve or enhance the significance of heritage assets (including preserving elements of their setting that make a positive contribution to the asset) of heritage assets , in particular considering to the setting of Lambeth Town Hall in views from Coldharbour Lane, which is identified as significant in the Brixton Conservation Area Statement."	The change modestly supports Objective 8, bringing the wording on heritage assets in line with the NPPF. This is not considered to change previous scoring for site 20.	No significant effects envisaged. No additional mitigation required.
20	MM38	Amend first bullet point: "reinststate a building line to Acre Lane, and provide a widened footway on Acre Lane "	The change provides consistency between the vision map and the policy text, this will support Objectives 1, 3 and 9. This is not considered to change previous scoring for site 20.	No significant effects envisaged. No additional mitigation required.
20	MM39	At the end of the third paragraph add:	This change brings the text in line with other allocations, and adds	No significant effects envisaged.

		<p><u>For residential uses, only disabled persons parking in line with London Plan Policy T6 will be supported.</u></p> <p>Amend fifth paragraph to read:</p> <p><u>“A suitable off-street servicing strategy for the supermarket and residential uses must be demonstrated.</u> Servicing of the replacement supermarket should follow the existing retail servicing route i.e. be accessed from Acre Lane (exact location to be determined at application stage) with exit via Baytree Road.”</p>	<p>clarity in terms of broader London Plan and Local Plan requirements. This will modestly support Objectives 1, 3 and 9. This is not considered to change previous scoring for site 20.</p>	<p>No additional mitigation required.</p>
20	MM40	<p>Amend final paragraph:</p> <p>“There may be benefits to future occupiers in reducing the height of the boundary wall shared with Arlington Lodge <u>As part of any future redevelopment proposals, consideration shall be given to reducing those parts of the boundary wall shared with Arlington Lodge that could improve the residential amenity of existing and future occupiers.</u>”</p>	<p>The change will ensure the policy is applied in a more nuanced way, protecting amenity of existing and future residents, therefore supporting Objective 6. This is not considered to change previous scoring for site 20.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
20	MM41	<p>At end of site allocation, add new row. Left hand column:</p> <p><u>“Expected delivery timescale”</u></p>	<p>The change adds clarity regarding the site’s contribution towards the council’s housing trajectory. This is</p>	<p>No significant effects envisaged.</p>

		Right hand column: " 2030-2035 ".	for information purposes and is not considered to change previous scoring for site 20.	No additional mitigation required.
21	MM42	Within first paragraph, amend as follows: “New buildings will reinstate the historic building line along Effra Road, respect local views and preserve elements of preserve or enhance the setting of the Brixton Conservation Area and other nearby heritage assets that make a positive contribution to these assets. ”	The change modestly supports Objective 8, bringing the wording on heritage assets in line with the NPPF. This is not considered to change previous scoring for site 21.	No significant effects envisaged. No additional mitigation required.
21	MM43	After third paragraph (including bullet points), insert: “ Other uses that are appropriate to the Brixton Creative Enterprise Zone, as set out in Local Plan Policy PN3, may be acceptable where they support the functioning of the Creative Enterprise Zone and do not undermine the town centre hierarchy. In particular, under Local Plan Policy ED1, large offices will be subject to a sequential test and must be of an appropriate scale, and smaller offices will be subject to a sequential test. ”	The change adds clarity regarding acceptability of land uses. This supports objectives 16 and 18, this is not considered to change previous scoring for site 21.	No significant effects envisaged. No additional mitigation required.
21	MM44	Amend second paragraph:	The change modestly supports Objective 8, bringing the wording on	No significant effects envisaged.

		<p>“Development should sustain and preserve or enhance the significance of nearby heritage assets (including preserving elements of their setting that make a positive contribution to the asset) of nearby heritage assets.”</p>	<p>heritage assets in line with the NPPF. This is not considered to change previous scoring for site 21.</p>	<p>No additional mitigation required.</p>
21	MM45	<p>Remove penultimate bullet point: “The community use and place of worship provides an opportunity for architectural interest and delight.”</p>	<p>The change removes extraneous text relating to buildings now outside the site boundary. This is not considered to change previous scoring for site 21.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
21	MM46	<p>Amend first paragraph to read: “Local Plan and London Plan transport policies will apply, therefore the development is expected to be car free with vehicle access restricted to disabled persons’ parking and servicing.”</p> <p>Amend sixth paragraph to read: “A suitable off-street servicing strategy for both the light industrial and residential uses must should be demonstrated. Where land use is linked to last mile distribution/logistics or ‘just-in-time’, servicing which utilises cargo bikes and minimise the need for vehicle access will be supported.”</p>	<p>The changes bring the text in line with other allocations and add clarity in terms of broader London Plan and Local Plan requirements on transport. These will modestly support Objectives 1, 3 and 9. This is not considered to change previous scoring for site 21.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

21	MM47	<p>At end of site allocation, add new row. Left hand column: "Expected delivery timescale"</p> <p>Right hand column: "2030-2035".</p>	<p>Change adds clarity regarding the site's contribution towards the council's housing trajectory. This is for information purposes and is not considered to change previous scoring for site 21.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
3	MM48	<p>Amend first paragraph: "Development should sustain and preserve or enhance the significance of all heritage assets (including preserving elements of their setting that make a positive contribution to the asset) of all heritage assets."</p> <p>Amend fourth paragraph: "Care is required to preserve elements of or enhance the setting of the Leigham Court Road (N) Conservation Area that make a positive contribution to the heritage asset[...]"</p>	<p>The change modestly supports Objective 8, bringing the wording on heritage assets in line with the NPPF. This is not considered to change previous scoring for site 3.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
3	MM49	<p>Amend first paragraph to read:</p>	<p>The changes bring the text in line with other allocations and will</p>	<p>No significant effects envisaged.</p>

		<p>“The site is not appropriate for a tall building, defined as above 25m in this location. Redevelopment should appropriately respond to the height of existing buildings across the road to reinforce the character of the town centre.”</p>	<p>improve the effectiveness of policy. This will provide very modest support to objective 8. This is not considered to change previous scoring for site 3.</p>	<p>No additional mitigation required.</p>
3	MM50	<p>Amend first paragraph to read: "Local Plan and London Plan transport policies will apply, therefore the development is expected to be car free with vehicle access restricted to disabled persons' parking and servicing."</p>	<p>The change adds clarity in terms of broader London Plan requirements on transport and brings the text in line with other allocations. These modestly support Objectives 1, 3, and 9. This is not considered to change previous scoring for site 3.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
3	MM51	<p>Amend paragraph to read: “Development should address existing open space deficiency and access to nature deficiency by meeting the requirements of Local Plan Policy EN1(d).”</p>	<p>The change will bring the text in line with other allocations, this would modestly support Objectives 2, 5, 10, and 11. This is not considered to change previous scoring for site 3.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
3	MM52	<p>At end of site allocation, add new row. Left hand column: "Expected delivery timescale" Right hand column: "2025-2030".</p>	<p>Change adds clarity regarding the site's contribution towards the council's housing trajectory. This is for information purposes and is not</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

			considered to change previous scoring for site 3.	
18	MM53	Increase the size of the dark blue shading indicating the location appropriate for tall buildings and move it towards the centre of the site.	The change provides consistency between the vision map and the policy text, improving the effectiveness of policy. This is not considered to change previous scoring for site 18.	No significant effects envisaged. No additional mitigation required.
18	MM54	Amend third paragraph onwards as shown: “The site as a whole has potential to accommodate approximately: <ul style="list-style-type: none"> • 150–170 self-contained residential units (gross) • 3,000–4,000 sqm GIA of commercial/community non-residential floorspace, including Use Classes E, F1 and F2 as indicated below Non-residential floorspace is; to include at least 1,123 sqm GIA light industrial workspace (Use Class E(g)(iii)) to achieve no net loss of existing industrial floorspace capacity}. This would provide a particular opportunity to provide flexible workspace for creative businesses, to	Change provides greater consistency over land use requirements and adds clarity in terms of broader Local Plan requirements for West Norwood and the Creative Business Cluster. These changes broadly support objectives 7, 16 and 18. This is not considered to change previous scoring for site 18.	No significant effects envisaged. No additional mitigation required.

	<p><u>enhance the growing cluster in West Norwood and Tulse Hill.</u></p> <p><u>In line with Local Plan Policy PN7B, non-residential uses within the primary shopping area along the Norwood Road frontage will be restricted through the use of planning conditions to ensure at least 50 per cent of ground floor units are in shop use (Use Class E(a)), alongside other town centre (Use Class E, generally) and community uses (Use Classes F1 and F2 appropriate to the town centre) that diversify and activate the high street, and promote its long-term vitality and viability. A mix of town-centre appropriate unit sizes and types should be provided along the Norwood Road frontage at street level. Uses will be restricted through conditions to ensure at least 50 per cent of units are in shop use within the primary shopping area, alongside other town centre and community uses that diversify and activate the high street. With the exception of <u>the primary shopping area along</u> the Norwood Road frontage, ground floor non-residential uses can be fully flexible within Class E and could include some space within Classes F1 or F2 if the uses are appropriate to the town centre location. There is a particular opportunity to provide flexible workspace for creative businesses, to</u></p>		
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	<p>enhance the growing cluster in West Norwood and Tutse Hill.</p> <p>These Indicative quantum relate to the entire site allocation area. If only some parcels of land within the allocated site come forward within the Plan period, only a proportion of these indicative quantum will be delivered.</p> <p>A mix of town-centre appropriate unit sizes and types should be provided along the Norwood Road frontage at street level. Uses will be restricted through conditions to ensure at least 50 per cent of units are in shop use within the primary shopping area, alongside other town centre and community uses that diversify and activate the high street.</p> <p>With the exception of the Norwood Road frontage, ground floor non-residential uses can be fully flexible within Class E and could include some space within Classes F1 or F2 if the uses are appropriate to the town centre location. There is a particular opportunity to provide flexible workspace for creative businesses, to enhance the growing cluster in West Norwood and Tutse Hill.”</p>		
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18	MM55	<p>Add second paragraph:</p> <p><u>"London Plan Policy E3 and Local Plan Policy ED2 on affordable workspace and Local Plan Policy ED7 relating to town centres will apply. In line with London Plan Policy E3(A), where there is affordable workspace on-site, planning obligations will be used to secure new affordable workspace at rents maintained below the market rate for that space. As stated in Local Plan Policy ED7(E), any major redevelopment proposals will be required through conditions or, where appropriate, planning obligations, to re-provide on affordable terms, subject to viability, any small shops that would be lost as a result of redevelopment. The council will work in partnership with applicants to ensure a commercial strategy is developed to minimise impacts on existing businesses on site."</u></p>	<p>The change adds clarity in terms of broader Local Plan requirements on employment and town centres. These changes broadly support objectives 7, 16 and 18. This is not considered to change previous scoring for site 18.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
18	MM56	<p>Amend first paragraph:</p> <p>“Development should sustain and preserve or enhance the significance <u>of all heritage assets</u> (including preserving elements of their setting that make a positive contribution to the asset) of all heritage assets.”</p>	<p>This modification modestly supports Objective 8, through bringing the wording on heritage assets in line with the NPPF. This is</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

			not considered to change previous scoring for site 18.	
18	MM57	<p>Amend the third paragraph to read:</p> <p>“If the conditions above are met:</p> <ul style="list-style-type: none"> • <u>Development on the site should create a coherent roofscape rising in height inwards from the perimeter, where it should appropriately respond to the height of the existing neighbouring buildings and be arranged to avoid unacceptable impact on neighbour amenity</u> • The <u>remaining</u> central part of the site is appropriate for a <u>grouping of tall buildings (i.e. exceeding the threshold definition of a tall building in this part of the borough – 25 m)</u> of a <u>maximum</u> general building height of 31m (75m AOD, <u>which in this location would translate into a maximum height of c. 31m above ground level</u> • <u>This grouping of tall buildings should be</u> set within new public space • Other buildings slightly exceeding the threshold definition of tall buildings in this part 	The changes provide more clarity on the design approach, contributing toward Objective 8. This is not considered to change previous scoring for site 18.	No significant effects envisaged. No additional mitigation required.

		<p>of the borough (25m) may be acceptable in the central part of the site</p> <ul style="list-style-type: none"> The rest of the site should create a coherent roofscape rising from the perimeter street frontages to a single highest point within the site” 		
18	MM58	<p>Amend fourth paragraph to read:</p> <p><u>“In order to provide enhanced public realm, where sites are redeveloped</u> along Norwood Road, the building line should be set back to <u>align with those of the current buildings at 294-296 and 304-322 Norwood Road, resulting in a minimum pavement width of 6m.</u> provide enhance public realm with <u>The enhancement of the public realm should also include</u> highway improvements to walking and cycling as part of the Healthy Route Network.</p> <p>Add new sixth paragraph to read:</p> <p><u>“A suitable off-street servicing strategy for the light industrial, commercial, community and residential uses</u></p>	<p>The changes provide clarity on the approach to design, public space and movement, while also bringing the text in line with existing London Plan policy, and text used for other allocations. The changes contribute modestly toward Objectives 1, 3, 8, and 9. This is not considered to change previous scoring for site 18.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>

		<u>must be demonstrated. Where land use is linked to last mile distribution/logistics or ‘just-in-time’, servicing which utilises cargo bikes and minimise the need for vehicle access will be supported.</u>		
18	MM59	Amend paragraph to read: “Development should address existing open space deficiency and access to nature deficiency by meeting the requirements of Local Plan Policy EN1(d).”	The change will bring the text in line with other allocations, this would modestly support Objectives 2, 5, 10, and 11. This is not considered to change previous scoring for site 18.	No significant effects envisaged. No additional mitigation required.
18	MM60	At end of site allocation, add new row. Left hand column: <u>"Expected delivery timescale"</u> Right hand column: <u>"After 2035"</u> .	Change adds clarity regarding the site’s contribution towards the council’s housing trajectory. This is for information purposes and is not considered to change previous scoring for site 18.	No significant effects envisaged. No additional mitigation required.
7	MM61	After the first sentence add: <u>"To the north of the site are the West Square Conservation Area and Elliot's Row Conservation Area."</u> Amend the final paragraph to read:	Changes provide further information on nearby heritage assets, and more specific detail on their status. Ultimately this will improve the effectiveness of policy, making a modest contribution	No significant effects envisaged. No additional mitigation required.

		<p>The Cottingham Close Council Estate to the South has been identified by the Council as being worthy of consideration as a potential post-war conservation area.</p> <p><u>The Cottingham Close Estate to the South has been identified in the Twentieth Century Society’s 2017 Conservation Area Project as a potential candidate as a post-war conservation area. This is considered to be a non-designated heritage asset.”</u></p>	<p>toward Objective 8. This is not considered to change previous scoring for site 7.</p>	
7	MM62	<p>Amend first paragraph:</p> <p>The site provides a significant an opportunity for comprehensive mixed-use redevelopment which is likely to achieve optimum development capacity and the best place-shaping outcome. H, however, given the two separate land ownerships, the site may also come forward in two phases, in which case each phase should contribute to and help deliver the overall vision for the site as a whole. Proposals for any part of the site should not compromise or restrict delivery of the overall vision or the ability of the other site to optimise its development capacity.</p> <p><u>Comprehensive mixed-use redevelopment is likely to achieve optimum development capacity and the best place-shaping outcome.</u></p>	<p>The changes better recognise the likelihood of the site coming forward in phases, this does not affect the substance of the policy, therefore no changes to previous scoring for site 7.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>

7	MM63	<p>Amend first paragraph:</p> <p>“Development should sustain and preserve or enhance the significance of heritage assets (including preserving elements of their setting that make a positive contribution to the asset) of heritage assets, in particular the former-listed former fire station on Renfrew Road.”</p>	<p>This change brings the heritage wording in line with the NPPF, ultimately this will improve the effectiveness of policy, making a modest contribution toward Objective 8. This is not considered to change previous scoring for site 7.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
7	MM64	<p>Amend first paragraph to read:</p> <p>"Local Plan and London Plan transport policies will apply, therefore the development is expected to be car free with vehicle access restricted to disabled persons' parking and servicing."</p> <p>Amend fourth paragraph to read:</p> <p>“A suitable off-street servicing strategy for the light industrial, community and residential uses must be demonstrated. No vehicular access or servicing should be provided from Dugard Way, although pedestrian access is required. Any partial redevelopment of the site should ensure that later phases can also be serviced from</p>	<p>These changes add clarity in terms of broader London Plan and Local Plan requirements on transport and bring the text in line with other allocations. These modestly support Objectives 1, 3, and 9. This is not considered to change previous scoring for site 7.</p>	

		<p>Kennington Lane rather than Dugard Way. On street servicing on Kennington Lane is unacceptable. Servicing is to be accommodated on site, with all vehicles able to enter and exit in forward gear. <u>Where land use is linked to last mile distribution/logistics or ‘just-in-time’, servicing which utilises cargo bikes and minimise the need for vehicle access will be supported.</u></p> <p>Amend final paragraph to read: “Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the local Healthy Route Network, <u>active travel connections, cycle hire provision and buses.</u>”</p>		
7	MM65	<p>After the fourth paragraph add: <u>“The NHS facilities are considered a ‘More Vulnerable Use’. Any reprovion of this use on site would need to satisfy the exceptions test as part of a Flood Risk Assessment.”</u></p>	<p>This modification supports Objective 13, clarifying that the NPPF considers health care facilities to be a ‘more vulnerable use’. This is not considered to change previous scoring for site 7.</p>	

7	MM66	<p>At end of site allocation, add new row. Left hand column: "Expected delivery timescale"</p> <p>Right hand column: "2025-2030 for southern part of the site".</p>	<p>Change adds clarity regarding the site's contribution towards the council's housing trajectory. This is for information purposes and is not considered to change previous scoring for site 7.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
22	MM67	<p>Amend first paragraph to read:</p> <p>“Development should sustain and preserve or enhance the significance of all heritage assets (including preserving elements of their setting that make a positive contribution to the asset) of all heritage assets with particular regard to the settings of the Loughborough Park Conservation Area and Ruskin Park, including views from Ferndene Road.</p>	<p>The change modestly supports Objective 8, bringing the wording on heritage assets in line with the NPPF. This is not considered to change previous scoring for site 22.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
22	MM68	<p>Add new first paragraph:</p> <p><u>"The site is not appropriate for a tall building, defined as above 45m in this location."</u></p>	<p>These changes add clarity in terms of built form and building heights and bring the text in line with other allocations. This would modestly support Objective 8. This is not</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

			considered to change previous scoring for site 22.	
22	MM69	<p>Amend third paragraph to read: <u>“Where possible, a suitable off-street servicing strategy for the light-industrial and residential uses should be demonstrated.</u> A pedestrian and vehicular service route through the site should be provided linking Hinton Road to Herne Hill Road. This must be safe, legible and overlooked. Shared surface environments are strongly discouraged given the mix of residential and light industrial uses required.”</p> <p>Amend fifth paragraph to read: “Existing business activity on Hardess Street generates significant vehicular activity and informal parking on the road. Consideration should be given to how the road will accommodate these vehicle movements, as well as the increased pedestrian/cycle and other servicing vehicle activity that would be generated by the development of this site. <u>Where land use is linked to last mile distribution/logistics or ‘just-in-time’, servicing which utilises cargo bikes and minimise the need for vehicle access will be supported.</u>”</p>	<p>These changes primarily bring the text in line with other allocations and add clarity in terms of broader London Plan and Local Plan requirements for transport. These will modestly support Objectives 1, 3 and 9. The final change will ensure safe and consistent running of nearby existing rail infrastructure, therefore this has a neutral impact on Objective 4. This is not considered to change previous scoring for site 22.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

	<p>Amend existing last paragraph to read:</p> <p>“Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure. Such obligations should contribute as towards the delivery of <u>i) local public realm and cycling infrastructure improvements in line with council’s strategies, including the Healthy Routes Network on Coldharbour Lane, the Healthy Neighbourhoods and the Kerbside strategies,</u> improvements to local cycling infrastructure <u>ii) expansion of the cycle hire infrastructure (including cycle hire docking stations) in the area</u> and <u>iii) improvements to Loughborough Junction station, with works to make the station step-free via an Access for All scheme being the highest priority.</u>”</p> <p>Add a new last paragraph to read:</p> <p><u>“Given the proximity of the site to railway infrastructure, engagement with the Asset Protection and Optimisation team at Network Rail (ASPRO) will be required in order to avoid any impact on the safe and efficient running of</u></p>		
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		<u>the railway and ensure access for repairs and maintenance is not compromised.</u>		
22	MM70	<p>Add a Groundwater and contaminated land section after Flood risk mitigation. The new section should read as follows:</p> <p><u>“Development must comply with Local Plan Policy EN4(f).</u></p> <p><u>Development should protect groundwater from contamination sources. The adjacent railway is identified as a source of contamination.”</u></p>	<p>These changes add supporting information on potential contamination sources and bring the text in line with other allocations, while making Local Plan requirements clear. This would modestly support Objectives 1 and 11. No change to previous scoring for site 22.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>
22	MM71	<p>Add the following second paragraph:</p> <p><u>“Planning obligations may be sought to mitigate any impacts of development on open space and enhance access to nature. Such obligations should contribute to improvement works to Wyck Gardens, Elam Street Open Space, Milkwood Community Park and Loughborough Park, which are, in that order, the four existing open</u></p>	<p>The changes provide information on potential planning obligations related to open space. This would support Objectives 3, 8 and 11. No change to previous scoring for site 22.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>

		<u>spaces in closest proximity to the site. Improvement works could comprise replacement of existing street furniture, accessibility enhancements, particularly in relation to new signage, improvements to gardens and habitats, landscape improvements and, where required, upgrades to or replacement of existing infrastructure such as children’s playgrounds.”</u>		
22	MM72	At end of site allocation, add new row. Left hand column: <u>"Expected delivery timescale"</u> Right hand column: <u>"2025-2030"</u> .	Change adds clarity regarding the site’s contribution towards the council’s housing trajectory. This is for information purposes and is not considered to change previous scoring for site 22.	No significant effects envisaged. No additional mitigation required.
23	MM73	Add new first paragraph: <u>"The requirements of Local Plan Policy S1 in relation to the reprovion of the community use should be addressed"</u> .	These changes add clarity in terms of Local Plan requirements on social infrastructure, and bring the text in line with other allocations. The change modestly supports Objective 4 and 7. This is not considered to change previous scoring for site 23.	No significant effects envisaged. No additional mitigation required.

23	MM74	<p>Add new first paragraph:</p> <p><u>“Development should sustain and enhance the significance of all heritage assets (including preserving elements of their setting that make a positive contribution to the asset) with particular regard to the settings of the Loughborough Park Conservation Area and Ruskin Park, including views from Ferndene Road.”</u></p>	<p>This modification modestly supports Objective 8, through bringing the wording on heritage assets in line with the NPPF and providing details of heritage assets located near to the site. This is not considered to change previous scoring for site 23.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
23	MM75	<p>Amend first paragraph to read:</p> <p><u>"Local Plan and London Plan transport policies will apply, therefore the development is expected to be car free with vehicle access restricted to disabled persons' parking and servicing. (...)"</u></p> <p>Amend third paragraph to read:</p> <p><u>“Where possible, a suitable off-street servicing strategy for the light-industrial, town centre, community, and residential uses should be demonstrated.</u> Vehicular servicing should be from the existing rear access. There is potential for freight consolidation with other surrounding sites, including Higgs Yard. <u>Where land use is linked to</u></p>	<p>These changes primarily bring the text in line with other allocations and add clarity in terms of broader London Plan and Local Plan requirements for transport. These will modestly support Objectives 1, 3 and 9. The final change will ensure safe and consistent running of nearby existing rail infrastructure, therefore this has a neutral impact on Objective 4. This is not considered to change previous scoring for site 22.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

	<p><u>last mile distribution/logistics or ‘just-in-time’, servicing which utilises cargo bikes and minimise the need for vehicle access will be supported.”</u></p> <p>Amend existing last paragraph to read:</p> <p>“Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure;. Such obligations should contribute towards as the delivery of i) local public realm and cycling infrastructure improvements in line with council’s strategies, including the Healthy Routes Network on Coldharbour Lane, the Healthy Neighbourhoods and the Kerbside strategies, improvements to local cycling infrastructure ii) expansion of the cycle hire infrastructure (including cycle hire docking stations) in the area and iii) improvements to Loughborough Junction station, with works to make the station step-free via an Access for All scheme being the highest priority.”</p> <p>Add a new last paragraph to read:</p> <p>“Given the proximity of the site to railway infrastructure, engagement with the Asset Protection and Optimisation</p>		
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		<u>team at Network Rail (ASPRO) will be required in order to avoid any impact on the safe and efficient running of the railway and ensure access for repairs and maintenance is not compromised.”</u>		
23	MM76	<p>Add a Groundwater and contaminated land section after Flood risk mitigation. The new section should read as follows:</p> <p><u>“Development must comply with Local Plan Policy EN4(f).</u></p> <p><u>Development should protect groundwater from contamination sources. The adjacent railway is identified as a source of contamination.”</u></p>	<p>These changes add supporting information on potential contamination sources and bring the text in line with other allocations, while making Local Plan requirements clear. This would modestly support Objectives 1 and 11. No change to previous scoring.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>
23	MM77	<p>Add the following second paragraph:</p> <p><u>“Planning obligations may be sought to mitigate any impacts of development on open space and enhance access to nature. Such obligations should contribute to improvement works to Wyck Gardens, Elam Street Open Space, Milkwood Community Park and Loughborough</u></p>	<p>The changes provide information on potential planning obligations related to open space. This would support Objectives 3, 8 and 11. No change to previous scoring.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>

		<u>Park, which are, in that order, the four existing open spaces in closest proximity to the site. Improvement works could comprise replacement of existing street furniture, accessibility enhancements, particularly in relation to new signage, improvements to gardens and habitats, landscape improvements and, where required, upgrades to or replacement of existing infrastructure such as children’s playgrounds.”</u>		
23	MM78	At end of site allocation, add new row. Left hand column: <u>"Expected delivery timescale"</u> Right hand column: <u>"After 2035"</u> .	To add clarity on when the sites in the SADPD are expected to contribute towards the council’s housing trajectory. This is for information purposes and is not considered to change previous scoring for site 23.	
24	MM79	Amend first paragraph: “Development should sustain and preserve or enhance the significance <u>of all heritage assets</u> (including preserving elements of their setting that make a positive contribution to the asset) of heritage assets <u>with particular regard to the settings of the Camberwell</u>	This modification modestly supports Objective 8, through bringing the wording on heritage assets in line with the NPPF and other allocations. This is not	No significant effects envisaged. No additional mitigation required.

	<p><u>Green Conservation Area (Southwark) and Ruskin Park, including views from Ferndene Road.</u> In particular:</p> <ul style="list-style-type: none"> • Ruskin Park (Grade II registered landscape) • Gamberwell Grove Conservation Area (Southwark) • Gamberwell Green Conservation Area (Southwark) • 93 Denmark Hill (Grade II) (Southwark) • 95 Denmark Hill (Grade II) (Southwark) • 97 Denmark Hill (Grade II) (Southwark) • 99 Denmark Hill (Grade II) (Southwark) • 103 Denmark Hill (Grade II) (Southwark) • Maudsley Hospital admin block (Grade II) (Southwark) • Railings to Maudsley Hospital (Grade II) (Southwark) • 111 Denmark Hill (Grade II) (Southwark) • Hambleden Block, Bessemer Road (local list) • Statute of Robert Bentley Todd, Bessemer Road (local list) • Railings and gate piers to Denmark Hill (local list) 	<p>considered to change previous scoring for site 24.</p>	
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		<ul style="list-style-type: none"> • Guthrie Block, Denmark Hill (local list) • Gate piers and railings to Venetian Road (non-designated heritage asset) 		
24	MM80	<p>Amend second paragraph:</p> <p>“Given the view constraints and proximity to heritage assets and neighbouring residential properties, development heights should range from approximately 13m (24m AOD) in the west adjacent to Northlands Street, approximately 9m (22m AOD) in the north fronting Venetian Road and rising to approximately 40m (56m AOD) along its eastern and southern boundaries.</p> <p>I. Development along Denmark Hill should present a unified height of approximately 40m (56m AOD) – presenting a lower shoulder height of approximately 9m (25m AOD) to Denmark Hill to step down towards the historic development across the road it in LB Southwark.”</p>	<p>These changes are for clarity purposes and do not alter any of the proposed heights but provide consistency over measurements used. The modification is not considered to change previous scoring for site 24.</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>
24	MM81	<p>Amend first paragraph to read:</p> <p>“Local Plan and London Plan transport policies will apply, therefore a material reduction in on-site car parking is expected. (...)”</p> <p>Amend existing last paragraph to read:</p>	<p>These changes primarily bring the text in line with other allocations and add clarity in terms of broader London Plan and Local Plan requirements for transport. These will modestly support Objectives 1,</p>	<p>No significant effects envisaged.</p> <p>No additional mitigation required.</p>

	<p>“Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure. Such obligations should contribute towards as the delivery of i) local public realm and cycling infrastructure improvements in line with council’s strategies, including the Healthy Routes Network on Goldharbour Lane, the Healthy Neighbourhoods and the Kerbside strategies, ii) expansion of the cycle hire infrastructure (including cycle hire docking stations) in the area, iii) public realm improvements ensuring clear, legible and safe walking routes to Denmark Hill railway station, iv) improvements to Denmark Hill station, should capacity issues be identified arising from development (working in partnership with LB Southwark).”</p> <p>Add additional paragraph to read:</p> <p>“Given the proximity of the site to railway infrastructure, engagement with the Asset Protection and Optimisation team at Network Rail (ASPRO) will be required in order to avoid any impact on the safe and efficient running of the railway and ensure access for repairs and maintenance is not compromised.”</p>	<p>3 and 9. The final change will ensure safe and consistent running of nearby existing rail infrastructure, therefore this has a neutral impact on Objective 4. This is not considered to change previous scoring for site 24.</p>	
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24	MM82	<p>Amend text as follows:</p> <p>“Where possible, the scheme should improve the relationship with existing neighbours. In accordance with Local Plan Policy Q2, the scheme should be designed to cause no unacceptable impacts on the amenity of existing and future neighbours adjacent to the site, <u>including overlooking, loss of daylight, overshadowing and noise pollution. Particular regard should be paid to the relationship with sensitive residential neighbours on</u> in particular Northlands Street and Venetian Road, including overlooking, loss of daylight, overshadowing and noise pollution.”</p>	<p>These changes add clarity in terms of Local Plan requirements on amenity, and bring the text in line with other allocations. These modestly support Objectives 2, 6, 7 and 12. This is not considered to change previous scoring for site 24.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>
24	MM83	<p>Add the following second paragraph:</p> <p><u>“Although opportunities to provide enhanced open space and access to nature within the site should be explored, planning obligations may be sought to mitigate any impacts of development on open space and access to nature. Such obligations should contribute to improvement works to Ruskin Park, which is the most likely open space to be used by hospital</u></p>	<p>The changes provide information on potential planning obligations related to open space. This would support objective 3, 8 and 11. This is not considered to change previous scoring for site 24.</p>	<p>No significant effects envisaged. No additional mitigation required.</p>

		<u>staff and visitors to the site. Amongst other improvements, these works should include accessibility enhancements, particularly in relation to new signage directing hospital users towards Ruskin Park.</u>		
24	MM84	At end of site allocation, add new row. Left hand column: <u>"Expected delivery timescale"</u> Right hand column: " <u>2025-2035</u> ".	To add clarity on when the sites in the SADPD are expected to contribute towards the council's development trajectory. This is for information purposes and is not considered to change previous scoring for site 24.	No significant effects envisaged. No additional mitigation required.

4. Conclusions

- 1.1. The assessment of the Main Modifications against the Sustainability Appraisal (SA) framework and the Habitats Regulations confirms that, as modified, the SADPD continues to contribute positively toward Lambeth's sustainable development objectives. The SA has identified no new significant effects arising from the Main Modifications, and therefore no additional mitigation is considered necessary when the SADPD and modifications are viewed together.
- 1.2. The Habitats Regulations Assessment further concludes that the modifications do not introduce any new development sites, alter the scale of development, or establish new impact pathways. Existing sensitive habitats remain geographically distant and unaffected, and no likely significant effects are anticipated—either alone or in combination.
- 1.3. Together, the findings of both the SA and HRA support the conclusion that the SADPD, including the Main Modifications, remains sound and consistent with the principles of sustainable development, and no further assessment or mitigation is required.