

ADDENDUM: SUSTAINABILITY APPRAISAL AND HABITATS REGULATIONS ASSESSMENT SCREENING ON MAIN MODIFICATIONS OF DRAFT REVISED LAMBETH LOCAL PLAN

1. INTRODUCTION

Introduction and purpose of the Addendum to the SA and HRA Reports

- 1.1 This document provides a sustainability appraisal of the proposed main modifications to the Draft Revised Lambeth Local Plan Proposed Submission Version Jan 2020 (DRLLP PSV Jan 2020). For background, the DRLLP PSV Jan 2020 was submitted to government on 22 May 2020. This triggered the start of the formal examination of the Plan by an independent planning inspector. This process included an examination hearing which took place virtually between 27 October and 12 November 2020. It is the inspector's task to determine whether the Plan is sound or not, according to the four 'tests of soundness' set out in the National Planning Policy Framework.
- 1.2 In order to address any issues of soundness identified during examination, the inspector – at the invitation of the council – can make recommendations about 'main modifications' to the plan. The Planning Inspectorate's 'Procedure Guide for Local Plan Examinations' (issued in November 2020) states that all proposed main modifications must be subject to public consultation and, where necessary, SA and HRA before the Inspector can make recommendations on them. Whilst the Inspector has not asked the council to undertake an SA or HRA on the proposed main modifications, the council has chosen to undertake one in the interests of completeness for the public consultation.
- 1.3 The Inspector for the Draft Revised Lambeth Local Plan asked a number of questions relating to the soundness of the Plan both before and during the examination hearing in October/November 2020. As a result, the council proposed a series of modifications to the wording of the Plan. The Inspector has subsequently added a column to this schedule setting out his response to the Council's proposed changes. In this 'Inspector response' column, he has made clear those changes he considers to be main modifications (indicated by a reference number prefixed with 'MM'), and those changes he considers to be minor i.e. not required to address soundness issues he has identified. Whilst most of the main modifications (MM) are as already suggested by the Council, in a small number of cases the Inspector has introduced either a changed MM or a completely new MM. The MMs introduced by the Inspector are limited in number and principally affect the following five aspects of land use policy:
- Affordable housing on sites proposing fewer than 10 residential units (policy H2(a)(iv)) – the Inspector proposes deleting the requirement to secure payments in lieu of affordable housing for schemes of this size, because national planning policy now precludes this approach.
 - Large-scale purpose-built shared living (policy H13(a)(iii)) – the Inspector proposes deleting the clause that seeks to cap rents to be equivalent to those

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in the surrounding area, as he considers this is contrary to the Secretary of State's letter to the Mayor of London dated 13 March 2020.

- Affordable workspace (policy ED2 clauses (a) and (h)) – the Inspector proposes two modifications to this policy: firstly to clarify that affordable workspace should only be applied to any uplift in office floorspace in major developments rather than to the gross quantum, in order to align the approach to that used for calculation of Community Infrastructure Levy; and secondly to introduce flexibility into the timing of the provision of affordable workspace, allowing this to happen within 12 months of first occupation of the rest of the office space provided.
- Key Industrial and Business Areas (policy ED3(b) and supporting text) – the Inspector proposes limited modifications to the changes already proposed by the Council, to make clearer the full range of types of business and industrial uses that can appropriately locate in these areas.
- Hotels (policy ED14(c)) – the Inspector proposes replacing the moratorium on further hotel development in Waterloo with a provision to consider any harm to residential amenity, the mix and balance of uses in the locality and the strategic functions of the Central Activities Zone.

1.4 The purpose of this Addendum to the Sustainability Appraisal on the Draft Revised Lambeth Local Plan Proposed Submission Version Jan 2020 (dated December 2019) and Habitat Regulations Assessment Screening Report (dated December 2019) is to inform the consultation of the proposed main modifications. Sustainability appraisal has been undertaken on the main modifications only. Consultation on the DRLLP at this stage is restricted to the proposed modifications. Table 2 assesses whether any of the proposed main modifications will result in any changes to the significant sustainability effects identified in the SA Report (December 2019) or to the conclusion of the HRA Screening Report.

Approach to the new SA and HRA work

1.5 This Addendum is not a standalone document and should be read together with the Sustainability Appraisal dated December 2019 on Draft Revised Lambeth Local Plan Proposed Submission Version Jan 2020, and Habitats Regulations Assessment Screening Report, December 2019 (plus its addendum dated May 2020). An assessment (see Table 2.1) has been undertaken of each main modification, considering each against the sustainability appraisal objectives used for the DRLLP PSV Jan 2020. For ease of reference the SA objectives that provide the framework for both the December 2019 SA and for this SA Addendum are provided below in Table 1, together with the SA scores of the December 2019 SA.

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Table 1: SA objectives and summary of SA scores (December 2019)

SA OBJECTIVE	SA SCORE
1. Ensuring safe communities with reduced crime and disorder	++
2. Promote a healthy borough, by reducing health inequalities and the causes of ill health.	++
3. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	+/?/-
4. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	?
5. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	++/?
6. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	++/?
7. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	++/?
8. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and historic assets.	++
9. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	++/?
10. To protect, enhance and promote biodiversity, and to bring nature closer to people.	++/?
11. To create, manage and enhance green infrastructure.	++/?
12. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare the Borough for the unavoidable effects of climate change.	+/?
13. To improve the quality of surface waters and groundwater, to achieve the wise management and sustainable use of water resources and to minimise flood risk.	+/?
14. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	+/?
15. To improve air quality	?/+
16. To maximise the education and skills levels of the population.	+
17. Create and sustain prosperity and business growth in a strong and dynamic local economy and improve the social and environmental performance of businesses.	++/?
18. To stimulate regeneration that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the re-use of previously developed land and existing buildings, taking into account constraints such as contaminated land.	++
19. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	++/?

1.7 This Addendum considers whether each proposed main modification (MM) is likely to have any significant sustainability effects and if so, the nature of these. Where such effects are identified the appraisal concludes whether those effects are of a sufficient scale to alter the SA score (derived at Proposed Submission stage) of the Local Plan as a whole in respect of any SA objective.

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Reasonable Alternatives**

- 1.10 Reasonable alternative approaches have been considered in the Local Plan making process. The modifications now proposed seek only to fine tune the Local Plan in light of regulation 19 representations and the examination. It is considered that there is no reason to suggest that any one modification is of particular significance from a sustainability perspective to justify appraisal of new alternatives beyond those already considered during the Local Plan making process and associated SA process.

2. ASSESSMENT OF PROPOSED MODIFICATIONS

- 2.1 Table 2 sets out the sustainability effects of each proposed modification to existing Local Plan policy or supporting text. The sustainability implications of each modification are assessed in isolation. If sustainability effects are anticipated, the assessment then considers whether any are judged sufficient enough to alter the existing SA score of the Local Plan as a whole, against any individual SA objective. As Table 2 shows, no modification was judged to be significant in the context of the sustainability performance of the Local Plan as a whole, and hence no changes are warranted to the original SA scores.
- 2.2 The assessment has also considered whether the main modifications could give rise to any likely significant effects or impacts on the integrity of any European Site. Assessment of main modifications has not identified any likely significant adverse effects on any European Site, nor any adverse impact on the integrity of the four sites closest to Lambeth. Similarly, no main modifications rely on mitigation measures to demonstrate that there will be no adverse impact on the integrity of the four sites, or that there will not likely be any significant effects on any European Site. Accordingly, it remains the case that an appropriate assessment is not required.

3. CONCLUDING STATEMENT

- 3.1 No modification has been judged to be significant in the context of the sustainability performance of the Local Plan as a whole. Similarly, no modification was judged to give rise to any likely significant effects or impacts of any European Site or require mitigation measures to demonstrate no adverse impact. Accordingly, no changes are warranted to the original SA scores or the conclusions of the Habitat Regulations Screening Assessment.

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Table 2: SA of proposed main modifications to Draft Revised Lambeth Local Plan Proposed Submission January 2020.

Topic area	Policy/para number	MM number	Sustainability effects of main modifications
Title of Plan	Front cover	MM1	None. Adds plan period 2020-2035 to front cover.
Spatial Strategy	3.3	MM2	None. MM2 provides clarification of housing trajectory for years 11-15 of the plan period.
Spatial Strategy	3.4	MM3	None. MM3 updates on indicative estimate of 3368 net additional serviced visitor accommodation rooms between 2015 and 2041.
Spatial Strategy	3.9	MM4 - MM5	None. MM4 and MM5 provide clarifications on role/support for CAZ and London Central Services Area / retaining industrial floorspace capacity.
Spatial vision	Spatial vision	MM6	None. Elaborating on the rich mix of strategic functions in the CAZ locations of South Bank, Waterloo and Vauxhall.
Strategic objectives	Objectives 2, 18, 19	MM7 – MM8	None. Clarification that maintaining industrial floorspace capacity to support the Central Services Area supports growth of key economic sectors and innovation, and importance of developing strategic functions of the CAZ in South Bank, Waterloo and Vauxhall.
Planning obligations	4.17 4.18	MM9 MM10	None. Clarification on how and when planning obligations and charging approaches will be used and where to find further information about the requirements.
Affordable housing	H2(a)(iv) 5.20 5.21 5.28 5.29	MM11 MM12 MM13 MM14 MM15	<p>These proposed main modifications are most relevant to SA Objective 6 on housing and SA Objective 5 on equality. Proposed MM11 and MM15 removes the requirement for affordable housing contributions from minor housing developments (those providing fewer than ten units gross) subject to viability. The inspector requires this modification to bring policy in line with national direction reflected in the Written Ministerial Statement Nov 2014 and the Secretary of State's letter to the Mayor of London dated 13 March 2020. While the SA on the DRLLP PSV Jan 2020 did identify that this specific element of policy H2 would result in significant positive effects on the achievement of SA Objectives 6 (housing) and 5 (equality); overall, it is considered that the remaining components of the affordable housing policy, together with MM12-MM14, will still result in positive effects (albeit reduced) on the provision of affordable housing in the borough.</p> <p>MM12 – MM14 amend policy to acknowledge that schemes providing between 10 and 25 units may find it difficult to provide on-site affordable housing, and where this is demonstrated to the satisfaction of the council, the council will consider proposals to provide the threshold level of affordable housing as an in lieu payment under the fast-track route. No significant effects are likely from these proposed modifications.</p> <p>It is considered that the potential effects related to the loss of clause (a)(iv) of policy H2 (ie MM11) are not judged to warrant a change in score from significant positive (++) to positive (+) for SA objective 6 in the context of the sustainability performance of the Local Plan as a whole (including all housing policies and applicable main modifications). The reasons for the uncertainty score in the original SA remain valid and therefore the final SA score for SA Objective 6 is ++/?. These modifications do not change to scores for SA Objective 5.</p>
Student housing	H7(a) 5.64	MM16 MM17	These proposed main modifications are most relevant to SA objectives 5 (equality), 6 (housing) and 7 (liveability). It is considered that these main modifications are not likely to have an adverse effect on the

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Topic area	Policy/para number	MM number	Sustainability effects of main modifications
	5.59	MM18	achievement of these sustainability objectives. It is also considered that these modifications are not considered to be significant in the context of the sustainability performance of the Local Plan as a whole, and hence no change is warranted to the original SA scores.
Older persons housing	H8(d) 5.78, 5.79, 5.85	MM19 MM20	These proposed main modifications are most relevant to SA objectives 5 (equality) and objective 6 (housing). The modifications make clear that the council will support new specialist older persons housing as defined by London Plan policy H13 where it meets identified need. The modifications clarify that the need is for the types of specialist accommodation set out in paragraphs 4.13.3 to 4.13.9 and does not include nursing homes. There is enough existing stock of nursing accommodation in the borough. The modifications clarify that the priority is to continue to support people to remain independent for as long as possible in their own home whilst also maintaining the stock of existing nursing home accommodation. The proposed modifications on their own do not result in significant effects on the attainment of SA Objectives 5 or 6 and the suggested policy change in the context of the Local Plan as a whole, and therefore has no change on original sustainability scores.
Estate regeneration	H11(a) 5.101	MM21 MM22	None. These proposed main modifications only seek to clarify that a viability assessment is required to demonstrate that the maximum proportion of affordable housing is being achieved.
Large scale purpose built shared living	H13 H13(a)(iii) 5.121 5.123 5.125 5.126	MM23 MM24 MM25 MM26 MM27 MM28	The proposed main modifications are most relevant to SA Objective 6 on housing, but also SA Objective 5 on equality. Proposed MM23 and MM25 mean that large scale purpose built shared living (LSPBSL) will be supported in locations that have good or excellent public transport accessibility and is well-served by local services, and where there is a management plan that appropriately mitigates potential harm to residential amenity. Other requirements listed in policy H13 and London Plan policy H16 will also apply. Proposed MM24 and MM27 seek to remove ability to cap rents to be equivalent to those in the surrounding area. The intent behind this clause was to help meet an identified housing need in Lambeth among young renters, and ensure new LSPBSL are affordable to young Lambeth residents rather than attract higher income individuals from outside the borough, but have no impact on addressing the unmet need in the Borough. The Inspector considers this contrary to the Secretary of State's letter to the Mayor of London dated 13 March 2020. This change in policy approach may result in a potential reduced positive impact on young single people in Lambeth. MM26 provides clarification on the minimum standards expected for cooking facilities. Proposed MM28 seeks to give an indication of what overconcentration is, in relation to LSPBSL and purpose-built student housing – generally two uses of this nature will not be permitted on adjacent sites. Overall, it is considered that the potential effects of proposed MM23-28 are judged not to be significant in the context of the sustainability performance of the Local Plan as a whole, and hence no change is warranted in the original SA scores.
Offices	ED1(b) 6.5	MM30 MM34	Proposed MM30 seeks to direct proposals for smaller offices to the CAZ, Opportunity Areas and all town centres. Outside of town centre proposals will be subject to the sequential test. It is considered that this proposed modification will likely have positive effects on SA Objectives 7 (liveability), 17 (local economy) 19 (tackling worklessness) and 9 (transport) that add to the already positive effects the Local Plan as a whole are achieving for these objectives (ie no change in score is warranted by proposed MM30). Proposed MM34 clarifies that while the presumption in policy is no loss of existing office floorspace; office floorspace will not be protected where it is demonstrated that it is ancillary to, or integral to the

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			operation of a hospital or other strategically important health facility. Potential effects of this proposed modification are judged not to be significant in the context of the sustainability performance of the Local Plan as a whole, and hence no change is warranted in the original SA scores.
Affordable workspace	ED2(a) ED2(d) ED2(f) 6.14 6.23	MM38 MM40 MM41 MM43 MM45	<p>Policy ED2 was judged to have significant positive effects on SA Objectives 17 (local economy) and 19 (tackling worklessness) in the SA on the DRLLP PSV Jan 2020. The proposed modifications relate to two points: first, to clarify that affordable workspace should only be applied to any uplift in office floorspace in major developments rather than to the gross quantum, in order to align the approach to that used for calculation of Community Infrastructure Levy; and secondly to introduce flexibility into the timing of the provision of affordable workspace, allowing this to happen within 12 months of first occupation of the rest of the office space provided.</p> <p>With regards to the first point (ie. MM38 and MM43), the impact of these proposed modifications will still be a positive effect on SA objectives 17 and 19 but it will be a reduced positive effect because affordable workspace is now only required on the uplift on office floorspace, rather than the total amount of office floorspace. This change will also slightly reduce the positive impacts of this new policy on those with protected characteristics identified as being potential beneficiaries. However, overall the introduction of this policy for the first time in Lambeth is a positive outcome with anticipated positive impacts on SA Objectives 17, 19 as well as objective 5 on equality.</p> <p>Therefore, potential effects of this proposed modification are judged not to be significant in the context of the sustainability performance of the Local Plan as a whole, and hence no change is warranted in the original SA scores.</p> <p>With regards to the second point, the proposed modification allows for affordable workspace to be provided within 12 months of first occupation of the non-affordable workspace. The Inspector reasoned this provides flexibility and hence effectiveness to the policy, also taking into account non-affordable workspace provision and occupation can often enable funding for the delivery of the affordable workspace elements. No significant effects are judged to result from this proposed modification. Proposed MM41 and 45 provide clarification that does not materially alter the Local Plan's proposals for the development and use of land.</p>
KIBAs	ED3(a) ED3(b) ED3(c) 6.28-6.29 6.30	MM47 MM48 MM49 MM50 MM51	The proposed modifications make clearer the full range of types of business and industrial uses that can appropriately locate in KIBAs. They also address the implications of the Secretary of State's direction to the Mayor on industrial land. Overall, it is considered proposed MM47 – 51 will have positive impact on SA Objectives 17 and 19 but not such that warrant a change in sustainability scores of the SA on the DRLLP PSV Jan 2020.
Non-designated industrial sites	ED4(b) 6.43	MM54 MM57	None. The proposed modifications are clarification (that the 'agent of change' principle will apply to mixed used developments on this type of site) and correction (reference to London Plan policy) only and do not materially alter the Local Plan's proposals for the development and use of land.
Railway arches	ED6(b) 6.51	MM60 MM61	MM60 allows for some consideration (against other relevant development plan policies) of change of use from industrial to other commercial or community uses of railway arches, rather than not permitting them at all. This will likely result in slightly more positive effects on SA Objectives 17 and 19, but also 7

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			(liveability) as well. MM60 also makes clear that Class C and <i>sui generis</i> residential will not be permitted on railway arches. MM60/61 encourages applicants to bring forward proposals for contiguous sets of railway arches. While it is considered these modifications will have positive effects on a number of sustainability objectives, they are judged not to be significant in the context of the sustainability performance of the Local Plan as a whole, and hence no change is warranted in the original SA scores.
Town centres	ED7(c) 6.55a 6.58	MM62 MM66 MM68	None. The proposed modifications provide clarifications that the CAZ retail clusters are included in the policy, further information on how a development is considered of appropriate scale, and corrections only.
Visitor accommodation	ED14(a) ED14(c) ED14(d) and (e) 6.101 6.102 6.103 6.108	MM87 MM88 MM89 MM90 MM91 MM92 MM93	MM87 and 88 proposed changes replace the moratorium on further hotel development in Waterloo with a provision to consider any harm to residential amenity, the mix and balance of uses in the locality and the strategic functions of the Central Activities Zone. The modifications also clarify that the sequential test will apply outside town centres. The modifications are most relevant to SA Objectives 7, 17 and 19 (liveability, local economy and tackling worklessness) and are likely to continue to result in positive effects on these objectives. No change is warranted to the existing SA scores for these objectives because the Local Plan as a whole already achieved significant positive scores for these objectives, and the proposed modification will not affect or address the reasons the objectives also scored an element of uncertainty. MM89 – 93 are clarifications and corrections that will not result in sustainability effects.
Education and skills	ED15(b) ED15(b)(i) 6.113 6.117	MM94 MM95 MM96 MM97	The proposed modifications provide clarification to the employment and skills policy (for example targets of all jobs - both construction phase and net additional jobs), and requirements of the Employment and Skills Plan. No significant effects are judged to result from these proposed modifications.
Social infrastructure	7.4 7.25	MM98 MM105	Clarification that outdoor sport facilities and playing fields will be considered under Local Plan policy EN1. This will have a positive effects on the amount of open space in the borough, but the significance of these effects and the nature of the proposed change is considered such that it will not materially alter the Local Plan's proposals for the development and use of land, nor alter existing SA scores.
Transport	T2(c) T3(e) T3(g) 8.17 T4(a)(xii) 8.29 T7(d)(ii) 8.35 8.36	MM106 MM107 MM108 MM109 MM110 MM111 MM112 MM113 MM114	The proposed main modifications provide clarifications on the following: <ul style="list-style-type: none"> the approach to cycle parking in purpose-built student accommodation charge points for electric cycles and on provision of pool bikes how to assess potential for water transport in development proposals The approach to permit free development the approach to parking for people with disabilities These points of clarification are most relevant to SA Objective 9 (transport) and are likely to result in positive effects. No change is warranted to the existing SA score because the Local Plan as a whole already achieved significant positive scores for the transport objective, and the proposed modification will not affect or address the reasons the objective also scored an element of uncertainty (which primarily relates to deliverability/funding of some projects).
Environment - open space and biodiversity	9.5 9.8 9.13	MM115 MM116 MM117	The proposed main modifications provide clarifications on the following: <ul style="list-style-type: none"> clarification that playing fields are protected as open space

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			<ul style="list-style-type: none"> clarification of how arrangements or management and maintenance of new, improved or replacement open space will be assessed and secured. clarification of urban greening requirements in commercial development <p>These points of clarification are most relevant to SA Objectives 8, 10 and 11 (built environment, biodiversity and green infrastructure) and are likely to result in positive effects. No change is warranted to the existing SA score because the Local Plan as a whole already achieved significant positive scores for these objectives, and it is not considered the proposed modifications will substantially affect or address the reasons objective 10 and 11 also scored an element of uncertainty (which primarily relates to the extent and degree of rigour on which the policies are applied, particularly the commitment to biodiversity and green infrastructure very early on in the design process).</p>
Waste	EN7(a) (ii) EN7(a) (iii) 9.67-9.69 9.77 9.81	MM118 MM119 MM120-122 MM123 MM124	The proposed main modifications provide clarification of the approach to waste management, assessment against the Mayor's waste apportionment, application of other policies in assessing development proposals for waste management, and monitoring. However, they are judged not to be significant in the context of the sustainability performance of the Local Plan as a whole, and hence no change is warranted in the original SA score for waste.
Quality of built environment	Q7(x) Q13(a)(vii) 10.58 10.97(ii) 10.112 Q23(c) Q26 Q26(a)(iv) Q26(b) 10.147 Q27(a) Q27(d)-(g) 10.155	MM125 MM126 MM127 MM128 MM129 MM130 MM131 MM132 MM133 MM134 MM135 MM136 MM137	<p>The proposed main modifications affecting the Quality of the Built Environment chapter of the DRLLP can be summarised as follows:</p> <ul style="list-style-type: none"> clarification of how to assess prejudice of development potential on adjoining sites clarification of standards for cycle storage clarification that sustainable design and construction and double glazing within the historic built environment should follow established conservation best practice clarification of the requirements within Archaeological Priority Areas inclusion of the definition of tall buildings within policy wording rather than supporting text; clarification that assessments should include transport accessibility; and clarification that part (b) of the policy will apply outside locations identified as appropriate for tall buildings in site allocations clarification of the approach to assessment the appropriate extent of basement development in residential and non-residential buildings <p>These proposed main modifications are judged not to be significant in the context of the sustainability performance of the Local Plan as a whole, and hence no change is warranted in the original SA scores.</p>
Waterloo	PN1(h)	MM139	No significant change in sustainability effects. Proposed MM139 provides clarification of the approach to the extension of Jubilee Gardens, including management and maintenance.
Loughborough Junction	11.135a 11.139 11.143 PN10(d)	MM149 MM150 MM151 MM152	The proposed main modifications involve inclusion of reference to King's College Hospital Foundation Trust's emerging masterplan for reconfiguration of its estate in Denmark Hill, and clarifications to the policy on Loughborough Junction, including in relation to assessment of proposals affecting existing community facilities in the area. These are judged not to be significant in the context of the sustainability performance of the Local Plan as a whole, and hence no change is warranted in the original SA scores.

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Upper Norwood/Crystal Palace	PN11(b)	MM155	None. Inclusion of the word 'potential' with reference to the Tramlink extension to Crystal Palace as this is not in TfL's active programme of works.
Annex 8	Annex 8	MM157	No significant effect. Proposed MM157 seeks to increase the monitoring target of modal share – walking, cycling and public transport from 85% to 90%.
Annex 8	Annex 8	MM158	None – inclusion of a new monitoring indicator.
Annex 10	Annex 10	MM160	None – correction to align with MM11 (see above).
Annex 13	Annex 13	MM162	None – replacement of tables and charts showing housing trajectory over ten years.
Changes to use class order	ED1 ED1(c)(d)(f) 6.6, 6.7, 6.10 ED2(b) ED2(g) 6.15 6.26 6.30 6.31 ED4(a) ED4(d) 6.39 6.43 6.44 ED6(a) 6.52 ED7(c) (d) (f) 6.54 6.56 6.58 – 6.59 6.61 ED8(d)-(f) 6.62 6.64 6.66 ED9(b) 6.67 6.73 ED10, ED10(c) 6.76 6.79 ED11 6.81-6.83	MM29 MM31 – 33, MM35-37 MM39 MM42 MM44 MM46 MM51 MM52 MM53 MM55 MM56 MM57 MM58 MM59 MM MM62-64 MM65 MM67 MM68-70 MM70 MM71-73 MM74 MM75 MM76 MM77 MM78 MM79 MM80-82 MM83 MM84 MM85 MM86	The proposed main modifications in response to the changes to the Use Class Order from 1 September 2020 involve replacing references to old use classes with words describing the use ('office' rather than B1a, or 'retail' rather than A1 for example); and making clear the Council's intention to use planning obligations and/or conditions to limit uses within the new, very broad E use class, where appropriate and justified to achieve the objectives of the policies. In this way, the overall objectives of the policies remain, and therefore no change in the sustainability of the policies. Accordingly, no change is warranted to the original SA scores.

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Topic area	Policy/para number	MM number	Sustainability effects of main modifications
	7.7	MM99	
	7.9	M100	
	7.15	M101	
	7.16	M102	
	7.20	MM103	
	S3(b)	MM104	
	PN1(c)	MM138	
	Site 6	MM140	
	Site 9	MM141	
	PN2(b)	MM142	
	PN3	MM143	
	PN4	MM144	
	PN5	MM145	
	PN6(a)	MM146	
	PN7	MM147	
	PN9(a)	MM148	
	PN10(f)	MM153	
	PN11	MM154	
	Annex 8	MM156	
	Annex 9	MM159	
	Annex 12	MM161	