

**Site Allocations Development Plan
Document: Proposed Submission Version
(Regulation 19)**

**Habitat Regulations
Assessment
Non-Technical Summary**

January 2024


Lambeth

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1. INTRODUCTION

- 1.1 Habitat Regulation Assessment (HRA) assesses the likely impacts of a plan's policies on the integrity of the Natura 2000 sites (also known as European sites). The purpose of the HRA is to ensure that the protection of the integrity of European sites is part of the planning process.
- 1.2 Under European legislation, Lambeth Council is required to undertake a HRA on all local development planning documents and projects. The Council is currently preparing a Site Allocations Development Plan Document (SADPD) which will form part of the statutory development plan for Lambeth, alongside the revised Lambeth Local Plan, the London Plan 2021 and South Bank and Waterloo Neighbourhood Plan 2019. In line with Regulations a HRA has therefore been undertaken.
- 1.3 An initial Stage 1 of the HRA process (screening) was undertaken to establish whether or not the proposals included within the Draft SADPD are likely to have a significant effect on Natura 2000 sites, and, if so, whether an Appropriate Assessment is required (stage 2 of the HRA). This concluded that the screening assessment of the Draft SADPD has not identified any likely significant effects or impacts on the integrity of any European Site.
- 1.4 The HRA has been updated and forms part of the evidence base for the SADPD Proposed Submission Version (PSV). While it is independent of the Sustainability Appraisal (SustA) which also incorporates the Strategic Environmental Assessment; results of this screening exercise have feed into the SustA for the SADPD PSV.
- 1.5 The key changes that have been reflected within this assessment are set out below. These changes have been assessed as having no impact as described in this assessment.

Site No.	Site Address	Proposed Changes
Site 1	Royal Street, SE1	<ul style="list-style-type: none"> The site area has been corrected from 7.2ha to 2.32ha. Building heights and locations amended to address Historic England concerns regarding impact on World Heritage Site. No significant change to other development principles.
Site 2	St Thomas' Hospital, SE1	<ul style="list-style-type: none"> Site extended west to better facilitate development within the hospital estate. Building heights and locations amended to address impact on World Heritage Site. Policy wording updated to require development to be set back from the roadside to address stakeholders concerns re cumulative impact of development. No significant change to other development principles.

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Site 3	35 – 37 and Car Park Leigham Court Road, SW16	<ul style="list-style-type: none"> • Reduction in the number of residential units to be delivered. Decreased from 30-35 units to 25-30 units. • No significant change to other development principles.
Site 7	6 – 12 Kennington Lane and Wooden Spon House, 5 Dugard Way, SE11	<ul style="list-style-type: none"> • Minor change to site boundary to reflect land registry ownership details. • Reduction in the number of residential units proposed. Decreased from 135-145 units to 115 – 125 units. • No significant change to other development principles.
Site 8	110 Stamford Street, SE1	<ul style="list-style-type: none"> • Reduction in the number of residential units proposed. Decreased from 30-40 units to 30 units. • No significant change to other development principles.
Site 9	Gabriel's Wharf and Princes Wharf	<ul style="list-style-type: none"> • Policy worded updated to allow for an element of extra care housing where need is demonstrated. • No significant change to development principles.
Site 17	330 – 336 Brixton Road, SW9	<ul style="list-style-type: none"> • Reduction in the number of residential units proposed. Decreased from 70-75 units to 60-70 units. • No significant change to other development principles.
Site 18	300 – 346 Norwood Road	<ul style="list-style-type: none"> • Significant local opposition to principle and scale of development. • Site boundary amended to reduce scale of allocation to exclude existing housing at north east corner and south west corner, also 'laundry' site which is already under construction. • Reduction in the number of residential units proposed. Decreased from 390-470 units to 150-170 units. • Quantum of commercial/community floorspace including light industrial workspace, reduced from 5,000-7,000 sqm to 3,000 – 4,000 sqm to include at least 1,123 sqm GIA light industrial workspace (to achieve no net loss of existing industrial floorspace capacity). • Additional wording proposed to clarify that a tall building will only be considered appropriate on the site if certain conditions are met e.g. public benefits are achieved. • No significant change to other development principles.
Site 19	Knolly's Yard, SW16	<ul style="list-style-type: none"> • Significant local opposition to principle and scale of development. • Deputy Leader confirmed site to be removed. • Site no longer proposed for allocation.
Site 20	Tesco, 13 Acre Lane, SW2	<ul style="list-style-type: none"> • Minor amendment to site boundary. • Proposed quantum of residential development increased from 120 -170 units to 180 -210 units. • No significant change to other development principles.

Site 21	51-57 Effra Road, SW2	<ul style="list-style-type: none"> • Site boundary amended to remove Fitch Court, Brixton Unitary Church and Mosaic Centre. • Reduction in the number of residential units proposed. Decreased from 200-240 units to 85-95 units. • No significant change to other development principles.
Site 22	1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24	<ul style="list-style-type: none"> • Indicative servicing location amended to be within the site on the servicing route (rather than on Hardess Street). • Proposed pedestrian link with Higgs through railway arch removed. • Reduction in the number of residential units proposed. Decreased from 70-90 units to 50-70 units. • Policy wording added related to the development implications for trees. • No significant change to other development principles.
Site 23	Land at corner of Coldharbour Lane and Herne Hill Road, SE24	<ul style="list-style-type: none"> • Indicative locations of National Grid assets included on context map. • Indicative light industrial area and the extent of 'sensitive residential neighbour' to be extended on the vision map • Reduction in the number of residential units proposed. Decreased from 30-40 units to 25-30 units. • Factual updates to policy text. • No significant change to other development principles.
Site 24	King's College Hospital, Denmark Hill, SE5	<ul style="list-style-type: none"> • Factual updates to policy text. • Clarification regarding the safeguarded waste site within the site added. • No significant change to other development principles.

2. METHODOLOGY

2.1 The Habitats Regulations process involves the following methodological process (drawn from the 2009 practice guidance by David Tyldesley Associates):

- i. Screening: assessing likely significant effects;
- ii. Scoping an appropriate assessment;
- iii. Appropriate Assessment;
- iv. Adding avoidance/mitigation measures;
- v. Formal consultation; and
- vi. Recording the assessment.

3. PROXIMITY TO EUROPEAN SITES

3.1 No European sites lie wholly or partly within Lambeth borough; however the sites listed below lie within 15km of the borough's boundaries. Using the Joint Nature Conservation Committee (JNCC) website; taking into account consultation with Natural England in preparing the HRA on the adopted Lambeth Local Plan; and in line with the methodology employed in the then draft London Plan Habitats Regulations Assessment Screening (Nov 2017), the following European sites have been identified that lie within a 15km zone extending from the boundary of the borough (European sites were included if they occurred either wholly or partially within this geographical area):

- Wimbledon Common SAC lies around 5-6km to the west;
- Richmond Park SAC lies around 7.5km to the west;
- Walthamstow Reservoirs, part of the Lee Valley SPA and Ramsar site, lie around 8-10km to the north east; and
- The extreme southern tip of Epping Forest SAC lies around 12km to the north east, although the main Epping Forest site lies more than 15km away.

3.2 This report considers whether the SADPD PSV, in itself, or in combination with other plans, will adversely affect the integrity of Wimbledon Common, Richmond Park, Walthamstow Reservoirs and Epping Forest.

4. IMPACT TYPES

4.1 Understanding the various ways in which land use plans can affect European sites is important in terms of screening for the Habitats Regulations. Current guidance suggests that the following European sites be included in the screening list:

- Sites within the authority's boundary; and
- Sites shown to be linked to development within the authority's boundary through a known 'pathway' (discussed below).

Recreational Causes

4.2 Terrestrial European sites can be adversely affected by recreational causes such as walkers, dog walking, mountain biking, motorbike scrambling, and off-road vehicle use. These are all capable of causing serious erosion as well as disturbance to sensitive species. Water-borne recreation can also adversely affect sensitive water bodies.

Effects of SADPD PSV

4.3 The Natura 2000 sites are located between 5km and 15 km away from Lambeth. It is considered unlikely residents of Lambeth will travel in large numbers or frequently to Natura 2000 sites for recreational purposes. Nonetheless, SADPD PSV policies make provision for new space within or nearby to proposed site allocations where possible.

Urbanisation

4.4 While urbanisation impacts are related to recreational impacts; it is discussed

separately as population in an area can create adverse social effects such as fly tipping and inadvertently fabricate an environment with damaging consequences to species such as owning a domestic cat (predation), or causing light or noise pollution to ornithological or bat species.

Effects of SADPD PSV

- 4.5 Given the Natural England guidance and the distance between Lambeth Borough and the sites (minimum of five kilometres), any urbanisation impacts as a result of the SADPD PSV policies are unlikely to have an adverse effect on the conservation features for which the sites are designated. It is also considered that urbanisation in Lambeth will not result in an adverse impact on the integrity of any of the sites.

Impacts on Surrounding Habitat

- 4.6 Related to urbanisation, impacts on surrounding habitats mostly concerns the development of land close to sites leading to a significant adverse effect on the site's integrity, particularly those designated for their ornithological or bat interest. Similarly, impacts affecting species or habitat on surrounding land upon which designated sites rely can adversely affect the species or habitat within the European site.

Effects of SADPD PSV

- 4.7 Given the distance between Lambeth borough and the four sites (of at least five kilometres away), any impacts as a result of the SADPD PSV policies are unlikely to have an adverse effect on the bird species of the SPA, nor are any species within Lambeth borough, likely to have an adverse effect upon the species within the designated site, nor is this considered to have an adverse impact on the integrity of the sites.
- 4.8 Lambeth is known to support populations of stag beetle (for which Wimbledon Common and Richmond Park are designated), with back gardens being a favoured habitat. However, it is considered that the populations of stag beetles in areas more than 5km distant from Richmond Park and Wimbledon Common are unlikely to have any relationship or bearing on the populations of the beetles in the two European sites. In addition, habitat supporting stag beetles in Lambeth (parks, woodlands and larger gardens) are unlikely to be affected by proposed development in the SADPD PSV. In addition, the Lambeth Local Plan 2020 seeks to protect the recreational role and biodiversity value of private and communal parks and gardens.

Atmospheric pollution

- 4.9 Oxides of Nitrogen (NO_x) can have a directly toxic effect upon vegetation. NO_x emissions are mainly related to vehicle exhaust.
- 4.10 Sulphur dioxide (SO₂) and Ammonia emissions (NH₃) are the other main atmospheric pollutants. SO₂ is mainly concerned with the output of coal stations and industrial processes that require the combustion of coal and oil. NH₃ emissions are influenced by agriculture.
- 4.11 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 µgm⁻³; the threshold for sulphur dioxide is 20 µgm⁻³.

- 4.12 The most acute impacts of NO_x take place close to where they are emitted, but individual sources of pollution will also contribute to an increase in the general background levels of pollutants at a wider scale, as small amounts of NO_x and other pollutants from the pollution source are dispersed more widely by the prevailing winds.
- 4.13 In terms of diffuse air pollution, Natural England has previously advised that effects of vehicular atmospheric emissions should be considered if the roads on which the vehicles travel are closer than 200m from a Nature 2000 site.

Effects of SADPD PSV

- 4.14 Given the above information on SO₂ and NH₃, it is unlikely that there will be any fundamental increase in SO₂ and NH₃ emissions associated with the SADPD PSV.
- 4.15 As the SADPD PSV seeks to accommodate additional dwelling units; it is conceivable that there may be an associated increase in vehicle use. However, the SADPD PSV makes clear development will be car-free and the sites are in key locations that are better served by public transport. Furthermore, about 50% of Lambeth's households have no access to a car . Therefore, it is unlikely that the SADPD PSV will result in significant increases to NO_x levels to threaten European sites which are sensitive to air pollution.
- 4.16 There are no Natura 2000 sites within 200m of any roads in the Lambeth borough. Accordingly, NO_x resulting from vehicle emissions associated with SADPD PSV development need not be considered further.

Water Resources

- 4.17 London and the southeast of England have been classified as areas under serious water stress. Attributable to climate change, these areas are expected to experience hotter, drier summers and warmer wetter winters, and more extreme weather events, including drought.

Effects of SADPD PSV

- 4.18 While the SADPD PSV promotes growth on 13 proposed sites, it is considered unlikely that any increase in development will adversely affect or impact on the integrity of the four sites for reasons pertaining to water resources due to the distance between the borough and the sites. In addition, 80 percent of public water supply for London comes from storage reservoirs connected to the River Thames and River Lee, with the remaining 20% coming from groundwater supplies of the confined chalk aquifer

Water quality

- 4.19 Increased amounts of housing or business development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on European sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has been identified, as being a major factor in causing unfavourable condition of European sites.

4.20 For sewage treatment works close to capacity, further development may increase the risk of effluent escape into aquatic environments. In many urban areas including London, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk. Increased discharge of treated sewage effluent, can result both in greater scour (as a result of greater flow volumes) and in high levels of macro algal growth, which can smother mudflats of value to SPA birds.

Effects of SADPD PSV

4.21 Any increases in wastewater resulting from policies promoting population, housing and employment growth in Lambeth are not likely to affect the four Natura 2000 sites as wastewater is treated at the Crossness Treatment Plant and discharged into the Thames.

5 SCREENING ANALYSIS

5.1 The SADPD PSV has been assessed (see Table 3 of the HRA) against the adapted criteria (see Table 2 of the HRA). This sets out four categories of potential effects as follows:

- **Category A:** elements of the plan / options that would have no negative effect on a European site at all;
- **Category B:** elements of the plan / options that could have an effect, but the likelihood is there would be no significant negative effect on a European site either alone or in combination with other elements of the same plan, or other plans or projects;
- **Category C:** elements of the plan / options that could or would be likely to have a significant effect alone and will require the plan to be subject to an appropriate assessment before the plan may be adopted;
- **Category D:** elements of the plan / options that would be likely to have a significant effect in combination with other elements of the same plan, or other plans or projects and will require the plan to be subject to an appropriate assessment before the plan may be adopted.

5.2 Categories A, C and D are further subdivided, and more detail is provided in Table 2 of the HRA report.

In-combination Effects

5.3 The assessment (Table 3) has not identified any significant adverse effects arising from the SADPD PSV alone. However, Lambeth does not sit in isolation and consideration has been made of the potential for effects in combination with development in other boroughs.

5.4 The HRA Screening Report on the Lambeth Local Plan reviewed the HRA Screening Report 2017 prepared for the development of the then emerging London Plan. It identified that *‘several amendments to policy or matters of direction to boroughs (particularly those around Epping Forest SAC) are required. However, once those*

matters are addressed it is considered that this report could be updated to conclude that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without likely significant effects on European sites, either alone or in combination with other plans and projects' (GLA HRA Screening Nov 2017).

- 5.5 Available HRA's for the Development Plan Documents of neighbouring boroughs have been reviewed. Some of these boroughs are located closer to European Sites than Lambeth borough. In general, all of these assessments found that their DPDs will not have an adverse impact on the European Sites, and they have concluded that there will be no 'in-combination' effects. Therefore, it is considered that the Appropriate Assessment stage is not required.

6. CONCLUSION

- 6.1 This screening assessment of the SADPD PSV has not identified any likely significant effects or impacts on the integrity of any European Site.
- 6.2 The identification of European Sites within 15km of the Lambeth borough boundary (either wholly or in part) are Wimbledon Common (SAC), Richmond Park (SAC), Walthamstow Reservoirs (SPA and Ramsar) and Epping Forest (SAC).
- 6.3 The assessment has found that the SADPD PSV is unlikely to have adverse effects on the European Sites and will not result in an adverse impact on the integrity on the four sites.
- 6.4 Recognising that the SADPD PSV does not exist in isolation; an in-combination assessment was also undertaken. Neighbouring borough HRA's were reviewed including the HRA prepared on the then draft London Plan 2017, and the HRA Screening Assessment on the Lambeth Local Plan. Taking these into account it is considered there will be no in-combination effects on the integrity of the four sites.
- 6.5 In summary, this screening assessment on the SADPD PSV has not identified any likely significant adverse effects on any European Site. Similarly, it is considered that the SADPD PSV will not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage is not required on the SADPD PSV for Lambeth borough.