

LB Lambeth: Site Allocations Development Plan Document

Sustainability Appraisal Addendum

October 2024

1. Introduction

- 1.1 This report is the addendum to the Reg 19 Sustainability Appraisal (SustA) for LB Lambeth's Site Allocation Development Plan Document (SADPD).
- 1.2 The SustA process is an iterative process which informs the development of plan policies, considering reasonable alternatives and evaluating them to establish the most sustainable option for final policy. This process follows the statutory requirements of a Sustainability Appraisal and Strategic Environmental Assessment methodology.
- 1.3 As set out in the planning policy guidance, modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. This SustA addendum has been produced to assess the impact of the proposed modifications to the submission version of the SADPD made following Reg 19 consultation.
- 1.4 Section 2 of this Addendum provides a summary of the SustA process for the SADPD so far.
- 1.5 Section 3 of this Addendum appraises the latest proposed modifications to the SADPD against the SustA framework. This considers whether the modifications are significant and whether this may result in any adverse effects on the environment which would require mitigation or an alternative approach to be considered.

2. Overview of the SustA process for the SADPD

- 2.1 The SustA process assists in determining the impact the SADPD is likely to have on baseline sustainability issues in the borough. The purpose of the SustA is not to identify the best option but rather inform the decision-making process by highlighting potential implications of pursuing a particular policy response.
- 2.2 The SustA should only focus on what is needed to assess the likely significant effects of the plan. It focuses on the environmental, economic and social impacts that are likely to be significant.
- 2.3 A full summary of the SustA methodology and process can be found in the SADPD Reg 19 SustA which is available with the Examination Library.
- 2.4 The Scoping Report for the SustA (originally titled *Integrated Impact Assessment Scoping Report*) was consulted on between 8 July and 2 September 2020. Scoping forms the initial stage of the SustA process and compiles baseline data and collection of information on relevant plans, policies and programmes that can have an influence on the production of the SADPD. This information informed the SustA framework. The framework consists of a series of 18 SustA objectives, these are aided by a series of prompt questions which the SADPD is measured against. The SustA framework is set out within Table 6 of the Reg 19 SustA report (p.31).
- 2.5 The SustA report for the draft SADPD was published for Reg 18 consultation between 10 January and 22 February 2022. This set out an appraisal of reasonable alternatives, alongside further detailed appraisals of the site allocations against the SustA framework.
- 2.6 An updated version of the SustA was published alongside the SADPD Proposed Submission Version (PSV) for Reg 19 consultation between 8 March and 3 May 2024 and between 18 June and 13 August 2024. This appraised the amendments made between the draft SADPD and the SADPD PSV and provided an updated assessment of all sites against the SustA framework.

- 2.7 Following Reg 19 consultation, the Council has considered all representations received. The key issues raised are summarised within Appendix B of the Reg 22 Consultation Statement (available in the SADPD Examination Library). The Council has put forward further modifications to the SADPD submitted for examination in response to certain issues raised in Reg 19 representations. These proposed modifications are set out in Table 1 in Section 3 of this document.
- 2.8 As set out in planning practice guidance (PPG), modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects. Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects.
- 2.9 The modifications made to the SADPD are considered against the SustA framework in the next section.

3. Proposed modifications to the SADPD

- 3.1 Table 1 provides a summary of proposed modifications for each site allocation. Any relevant SustA objectives have been identified, and the SustA 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.

Table 1: Assessment of the proposed modifications to the SADPD against the SustA Framework

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
SA1 - Royal Street	<p>p.13 'Flood risk' section</p> <p>Amend first paragraph to read: "Wholly within the EA's Flood Zone 3 and 2100 Thames Tidal Breach Scenario, although the site of Canterbury House is outside the 2005 Thames Tidal Breach Scenario."</p>	<p>Proposed modification made in response to comments from the Environment Agency. This provides additional contextual information on the latest Tidal Breach Scenario. The change would support SustA Objective 12 (Climate change and energy) and Objective 13 (Water resources and flood risk management). The site allocation scored positively against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.</p>	No significant effect.
SA1 - Royal Street	<p>p.13 'Transport and access' section.</p> <p>Amend second bullet point as shown: "South Lambeth Road <u>Lambeth Palace Road</u> is part of the TfL Road Network (TLRN)".</p>	<p>Proposed modification made in response to comments from Transport for London.</p> <p>This corrects a previously mislabelled road name. No impact on the previous Reg 19 SustA scoring.</p>	No significant effect.
SA1 - Royal Street	<p>p.14 'Relevant planning history' section.</p> <p>Add new text to read: "<u>Land North And South Of Royal Street 05/01168/FUL - The demolition of the existing buildings and the erection of eight new buildings ranging in height from 20 to 5 storeys (generally reducing towards the park) to provide 641 residential units including (231 units - 407 bed spaces for key workers), a health facility (3,142 sqm.) including a patients hotel, a nursery for NHS staff (766 sqm.), accommodation for the families of sick children (1,780 sqm.), ground floor retail and cafe uses (205 sqm.), 209 off-street parking spaces, and</u></p>	<p>Proposed modification made in response to comments from Lambeth Green Group Councillors. This provides information regarding an extant planning permission at the site granted at appeal in 2005. Information is not relevant to the SustA scoring for the proposed site allocation at this site.</p>	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
	<u>associated landscaping, service and highway works. Granted 09/10/2007."</u>		
SA1 Royal Street	p.21 'Transport, movement and public realm' section. Add text to end of first paragraph to read: " <u>London Plan Policy SI 15 and Local Plan Policy T5 relating to river transport may also be relevant.</u> "	Proposed modification made in response to comments from the Port of London Authority. This directs readers to London Plan and Local Plan expectations on water / river transport. This supports SustA Objective 4 (Provision of essential infrastructure) and Objective 9 (Transport and travel). The site allocation received significant positive scores against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA1 Royal Street	p.23 'Access to open space and nature conservation' section. Add new second paragraph to read: " <u>Development proposals are encouraged to 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.</u> "	Proposed modification made in response to comments from the Port of London Authority. Changes add clarity in terms of London Plan and Local Plan expectations on the Thames and use and enjoyment of waterways. The change supports SustA Objective 2 (Good health and wellbeing), Objective 3 (Access and services), Objective 4 (Equality and diversity), Objective 7 (Liveability and place), Objective 8 (Built and historic environment), Objective 9 (Transport and travel), and Objective 13 (Water resources and flood risk management). Overall, this site allocation received positive scores against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA1 Royal Street	p.23 'Access to open space and nature conservation' section. 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	Proposed modification made in response to comments from the Waterloo Community Development Group. Changes add certainty over expectations on existing open space. The change support SustA Objective 2 (Good health and wellbeing), Objective 3 (Access and services), Objective 4 (Equality and diversity), Objective 7 (Liveability	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
	requirements of Local Plan Policy EN1(d). The entrance to Archbishop's Park should be improved."	and place), Objective 8 (Built and historic environment), Objective 9 (Transport and travel), and Objective 11 (Green infrastructure). Overall, the site allocation received positive scores against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	
SA2 St Thomas Hospital	p.26 'Transport and access' section. Amend sixth bullet point as shown: " South Lambeth Road <u>Lambeth Palace Road</u> is part of the TfL Road Network (TLRN)".	Proposed modification made in response to comments from Transport for London. The proposed modification corrects previously mislabelled road name. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA2 St Thomas Hospital	p.34 'Transport, movement and public realm' section. Add text to end of first paragraph to read: " <u>London Plan Policy SI 15 and Local Plan Policy T5 relating to river transport may also be relevant.</u> "	Proposed modification made in response to comments from Port of London Authority. This adds clarity in terms of London Plan and Local Plan expectations on water / river transport. The change would support SustA Objective 4 (Provision of essential infrastructure) and Objective 9 (Transport and travel). The site allocation received significant positive scoring on this objective in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA2 St Thomas Hospital	PROPOSED CHANGE p.35 'Flood mitigation' section. 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 <u>years for commercial-75 years for non-residential</u>), and that a	Proposed modification made in response to comments from the Environment Agency. Changes provide further detail on flood risk requirements and tidal breach scenario. The changes support SustA Objective 12 (Climate change and energy) and Objective 13 (Water resources and flood risk management). The site allocation scored positively against these in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
	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> "		
SA2 St Thomas Hospital	p.36 'Access to open space and nature conservation' section. Add new second paragraph to read: " <u>Development proposals are encouraged to 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.</u> "	Proposed modification made in response to comments from Port of London Authority. Changes add clarity in terms of London Plan and Local Plan expectations on the Thames and use and enjoyment of waterways. The change supports SustA Objective 2 (Good health and wellbeing), Objective 3 (Access and services), Objective 4 (Equality and diversity), Objective 7 (Liveability and place), Objective 8 (Built and historic environment), Objective 9 (Transport and travel), and Objective 13 (Water resources and flood risk management). Overall, this site allocation scored positively against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA3 35-37 and Car Park Leigham Court Road	p98. 'Neighbour context' section. Amend first paragraph to read: "The retail properties on the north side of Leigham Court Road between the site and Streatham High Road are generally single storey although 29–33 Leigham Court Road is two-storey, <u>with residential on the first floor.</u> "	Proposed modification made in response to comments from Streatham Alliance. The change provides clarification on residential neighbours to the site. This will support SustA Objective 7 (Liveability and place). This site allocation received significant positive scoring on this objective in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
SA3 35-37 and Car Park Leigham Court Road	p.103 'Transport, movement and public realm' section. Amend first paragraph to read: "Local Plan and London Plan transport policies will apply, <u>therefore the development is expected to be car free with vehicle access restricted to disabled persons' parking and servicing.</u> "	Proposed modification made in response to comments from Transport for London. The change provides clarification over the expected outcomes of London Plan Policy T6 parking. This site allocation received significant positive scoring on this objective in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA7 7-12 Kennington Lane and Wooden Spoon House	p.123 'Heritage assets' section. 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> "	Proposed modification made in response to comments from LB Southwark. The change provides further details on heritage assets in the surrounding context. The change supports SustA objective 8 (Built and historic environment). This site allocation received positive/significant positive scoring on this objective in in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA7 7-12 Kennington Lane and Wooden Spoon House	p.123 'Heritage assets' section. Amend the final paragraph to read: ' 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. <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.</u> '	Proposed modification made in response to comments from Jon Barker and Unite Group PLC. The changes redress the incorrect estate name and provide a more accurate description of its heritage status. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA7 7-12 Kennington Lane and	p.129 'Heritage Assets' section. Add final paragraph: " <u>The stock brick wall separating the two</u> "	Proposed modification made in response to comments from Unite Group PLC. The change clarifies that the existing brick wall is not a heritage asset, as previously detailed within the design evidence	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
Wooden Spoon House	<u>parts of the site is a remnant of the old workhouse but its outside the conservation area and isolated from all the surviving historic buildings. Given its limited historic interest, it is not considered to be a heritage asset."</u>	paper. The modifications do not affect the previous scoring for this site allocation.	
SA7 7-12 Kennington Lane and Wooden Spoon House	p.130 'Transport, movement and public realm' section. Amend first paragraph to read: "Local Plan and London Plan transport policies will apply, <u>therefore the development is expected to be car free with vehicle access restricted to disabled persons' parking and servicing.</u> "	Proposed modification made in response to comments from Transport for London. The change provides clarification over the expected outcomes of London Plan Policy T6 parking requirement. The change supports Objective 9 (Transport and Travel). This site allocation received positive/significant positive scoring on this objective in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA7 7-12 Kennington Lane and Wooden Spoon House	p.130 'Transport, movement and public realm' section. Amend fourth paragraph to read: "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 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> "	Proposed modification made in response to comments from Transport for London. The change promotes the use of sustainable logistics, therefore supporting Objective 9 (Transport and Travel) and Objective 12 (Climate change and energy). Both objectives received positive scores in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
Site 7 6-12 Kennington Lane	p.130 'Transport, movement and public realm' section. 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</u> , <u>cycle hire provision and buses</u> ."	Proposed modification made in response to comments from Transport for London. The change promotes improvements in active travel and public transport, therefore supporting Objective 9 (Transport and Travel) and Objective 12 (Climate change and energy). Both objectives received positive scores in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA7 7-12 Kennington Lane and Wooden Spoon House	P131 'Flood risk mitigation' section. After the fourth paragraph add: " <u>The NHS facilities are considered a "More Vulnerable Use", any reprovision of this use on site would need to satisfy the exceptions test as part of a Flood Risk Assessment.</u> "	Proposed modification made in response to comments from the Environment Agency. The additional text makes clear the NPPF flood risk category of the NHS facilities and the exceptions test requirement. The change would support SustA Objective 12 (Climate change and energy) and Objective 13 (Water resources and flood risk management). The site allocation scored positively against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA8 110 Stamford Street.	p.39 'Transport and access' section. Add new sixth bullet point to read: " <u>Stamford Street is part of the TfL Road Network (TLRN)</u> "	Proposed modification made in response to comments from Transport for London. These provide additional contextual information regarding the TfL Road Network adjacent to the site. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA8 110 Stamford Street.	p.45 'Transport, movement and public realm' section. Add text to end of first paragraph to read: " <u>London Plan Policy SI 15 and Local Plan Policy T5 relating to river transport may also be relevant.</u> "	Proposed modifications made in response to comments from the Port of London Authority. This adds clarity in terms of London Plan and Local Plan expectations on water / river transport. The change would support SustA Objective 4 (Provision of essential infrastructure) and Objective 9 (Transport and travel). The site allocation scored	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
		positively against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	
SA8 110 Stamford Street.	<p>p.46 'Access to open space and nature conservation' section.</p> <p>Add new second paragraph to read: "<u>Development proposals are encouraged to 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.</u>"</p>	Proposed modification made in response to comments from the Port of London Authority. Changes add clarity in terms of London Plan and Local Plan expectations on the Thames and use and enjoyment of waterways. The change supports SustA Objective 2 (Good health and wellbeing), Objective 3 (Access and services), Objective 4 (Equality and diversity), Objective 7 (Liveability and place), Objective 8 (Built and historic environment), Objective 9 (Transport and travel), and Objective 13 (Water resources and flood risk management). Overall, this site allocation received positive scores against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA9 Gabriel's Wharf and Princes Wharf, Upper Ground	<p>p.51 'Relevant planning history' section.</p> <p>Under 'Adjacent to the site – 72 Upper Ground' add new text to read: "<u>17/03986/FUL Demolition of existing buildings and the construction of two new buildings (up to 14 storeys and 31 storeys in height with two basement levels) for the provision of circa. 44,434 sq.m of offices (Use Class B1), 3,634 sq.m of television studios (Sui Generis), 216 sq.m of retail (Use Class A1) and 213 residential dwellings (Use Class C3) with associated vehicle and cycle parking, access works, servicing and landscaping. Granted 03/05/2018.</u>"</p>	Proposed modification made in response to comments from MEC London Property 3 (General Partner) Limited. Proposed change provides additional contextual information regarding recent planning permission granted on adjacent site. The modifications do not affect the previous scoring for this site allocation.	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
SA9 Gabriel's Wharf and Princes Wharf, Upper Ground	<p>p.51 'Relevant planning history' section.</p> <p>Amend text as follows: "21/02668/EIAFUL – Demolition of all existing buildings and structures for a mixed-use redevelopment comprising offices, cultural spaces and retail uses with associated public realm and landscaping, servicing areas, parking and mechanical plant. Decision pending <u>Approved 04/03/2024.</u>"</p>	Proposed modification made in response to comments from MEC London Property 3 (General Partner) Limited. Proposed change provides additional contextual information regarding recent planning permission granted on adjacent site. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA9 Gabriel's Wharf and Princes Wharf, Upper Ground	<p>p.54 'Land uses' section.</p> <p>Amend last sentence of paragraph 1 to read: "This may include an element of extra care housing <u>or a nursing home</u>, where need is demonstrated."</p>	Proposed modification made in response to comments from South Bank and Waterloo Neighbours (SoWN), Waterloo Community Development Group, Coin Street Community Builders (CSCB), and various individuals. The change provides flexibility for a nursing home as part of the land use mix, therefore, this aspect may support SustA Objective 2 (Good health and wellbeing), Objective 5 (Equality and diversity), Objective 6 (Housing), Objective 9 (Transport and travel). While a nursing home use could limit the delivery of C3 dwellings on site, non-self-contained accommodation for older people would help to meet specialist housing need for certain groups. On balance, the modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA9 Gabriel's Wharf and Princes Wharf, Upper Ground	<p>p.57 'Neighbour relationships' section.</p> <p>Add new second paragraph to read: "<u>Development should be well integrated with and complement neighbouring</u></p>	Proposed modification made in response to comments from MEC London Property 3 (General Partner) Limited. Proposed change provides additional contextual information regarding recent planning permission granted on adjacent site. The modifications do not affect the previous scoring for this site allocation.	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
	<u>development at 72 Upper Ground; especially in relation to the site interfaces."</u>		
SA9 Gabriel's Wharf and Princes Wharf, Upper Ground	<p>p.57 'Flood mitigation' section.</p> <p>Amend paragraph 9 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>"</p>	<p>Proposed modifications made in response to comments from the Environment Agency. Changes provide further detail on flood risk requirements and tidal breach scenario. The changes support SustA Objective 12 (Climate change and energy) and Objective 13 (Water resources and flood risk management). The site allocation received positive scores against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.</p>	No significant effect.
SA9 Gabriel's Wharf and Princes Wharf, Upper Ground	<p>CHANGE p.49 'Heritage assets' section.</p> <p>Add a sixth bullet point to read: "<u>OXO Tower (LB Southwark)</u>"</p>	<p>Proposed modification made in response to comments from LB Southwark. The change provides further details on heritage assets in the surrounding context. The change supports SustA objective 8 (Built and historic environment). This site allocation scored positively on this objective in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.</p>	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
SA9 Gabriel's Wharf and Princes Wharf, Upper Ground	p.54 'Land uses' section. Add new paragraph to read: " <u>Meanwhile uses on Gabriel's Wharf and Princes Wharf will be encouraged in advance of comprehensive redevelopment. Investment to enable this will be supported.</u> "	Proposed modification made in response to comments from Coin Street Community Builders. In the short to medium term, this could support Objective 7 (Liveability and place), Objective 8 (Built and historic environment), Objective 16 (Local economy), and Objective 17 (Regeneration and efficient use of land). The site allocation received significant positive scores against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA9 Gabriel's Wharf and Princes Wharf, Upper Ground	p.56 'Transport, movement and public realm' section. Add text to end of first paragraph to read: " <u>London Plan Policy SI 15 and Local Plan Policy T5 relating to river transport may also be relevant.</u> "	Proposed modification made in response to comments from the Port of London Authority. This adds clarity in terms of London Plan and Local Plan expectations on water / river transport. The change would support SustA Objective 4 (Provision of essential infrastructure) and Objective 9 (Transport and travel). The site allocation scored positively against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA9 Gabriel's Wharf and Princes Wharf, Upper Ground	p.57 'Neighbour relationships' section. Amend text as follows: "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."	Proposed modification made in response to comments from Waterloo Community Development Group. Changes provide additional contextual information regarding neighbouring public realm, supporting SustA Objective 7 (Liveability and Place) and Objective 8 (Built and historic environment). The site allocation received significant positive scores against these objectives in the the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA9 Gabriel's Wharf and	p.58 'Access to open space and nature conservation' section.	Proposed modification made in response to comments from the Port of London Authority. Changes add clarity in terms of London Plan and	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
Princes Wharf, Upper Ground	Add new second paragraph to read: " <u>Development proposals are encouraged to 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> "	Local Plan expectations on the Thames and use and enjoyment of waterways. The change supports SustA Objective 2 (Good health and wellbeing), Objective 3 (Access and services), Objective 4 (Equality and diversity), Objective 7 (Liveability and place), Objective 8 (Built and historic environment), Objective 9 (Transport and travel), and Objective 13 (Water resources and flood risk management). Overall, these objectives received positive scoring in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	
SA17 330-336 Brixton Road	p.70 'Transport, movement and public realm' section. Amend the third paragraph to read: "Servicing should be accommodated off-street, 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> "	Proposed modification made in response to comments from Transport for London. The change promotes the use of sustainable logistics, therefore supporting Objective 9 (Transport and Travel) and Objective (Climate change and energy). SustA. The site allocation received positive / significant positive scores against these objectives in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA18 286-362 Norwood Road	p.110 'Groundwater and contaminated land' section Add statement: " <u>Potential contamination from petrol station.</u> "	Proposed modification made in response to comments from the Environment Agency. The change will support health outcomes and protect water sources, in line with Objectives 2 (Good health and wellbeing) and 13 (Water resources and floor risk management). The modifications do not affect the previous scoring for this site allocation.	No significant effect.
SA18 286-362 Norwood Road	p.117 'Transport, movement and public realm' section.	Proposed modification made in response to comments from Transport for London. The change promotes the use of sustainable logistics, therefore supporting Objective 9 (Transport and Travel) and Objective	No significant effect.

Site Allocation	Proposed modification to the SADPD	Consideration of modification against the SustA framework	Are SA effects significant?
	Amend sixth paragraph to read: "A suitable off-street servicing strategy for both the light industrial and residential uses should be demonstrated. <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> "	(Climate change and energy). Both objectives received positive scoring in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	
Site 21 51-65 Effra Road	p.90 'Transport, movement and public realm' section. Amend first paragraph to read: "Local Plan and London Plan transport policies will apply, <u>therefore the development is expected to be car free with vehicle access restricted to disabled persons' parking and servicing.</u> "	Proposed modification made in response to comments from Transport for London. The change provides clarification over the expected outcomes of London Plan Policy T6 parking requirement. The change supports Objective 9 (Transport and Travel). The site allocation was previously noted as having significant positive effect on this Objective in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.
Site 21 51-65 Effra Road	p.90 'Transport, movement and public realm' section. Amend sixth paragraph to read: "A suitable off-street servicing strategy for both the light industrial and residential uses should be demonstrated. <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> "	Proposed modification made in response to comments from Transport for London. The change promotes the use of sustainable logistics, therefore supporting Objective 9 (Transport and Travel) and Objective (Climate change and energy). Both objectives received positive scoring in the Reg 19 SustA. The modifications do not affect the previous scoring for this site allocation.	No significant effect.

4. Conclusion

- 4.1 The proposed modifications to the SADPD made following Reg 19 consultation have been considered against the SustA framework. The scoring of the site allocations against the key sustainability objectives has been revised.
- 4.2 The proposed modifications to the SADPD will support the delivery of a broad range of objectives set out within the SustA framework. On balance, it is considered these proposed modifications are unlikely to result in any major change to the SustA scoring from the previous Reg 19 SustA.
- 4.3 Overall, none of the proposed modifications changes are considered to have a significant impact on the SustA, therefore, no further assessment or mitigation measures are required.