

Habitat Regulations Assessment Addendum of the Proposed Main Modifications (HRA Addendum)

London Borough of Wandsworth Local Plan Partial Review (WLPPR)

November 2025

Public Consultation 26 November 2025 to 14 January 2026



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1. Introduction

- 1.1. The Wandsworth Local Plan Partial Review (WLPPR) was submitted to the Secretary of State on 30th April 2025. Following the hearing sessions as part of the Examination in Public, which took place between 4th and 6th November 2025, the Planning Inspector has proposed a list of Main Modifications¹ to the WLPPR.
- 1.2. The proposed Main Modifications can be viewed:
 - On the Council's website [Local Plan Partial Review: Examination - Wandsworth Borough Council](#)
 - In the Borough's main libraries (Balham, Battersea, Putney, Roehampton, Tooting and Wandsworth Town) during regular opening hours
 - At Wandsworth Town Hall (Wandsworth High Street, London SW18 2PU) during regular opening hours

2. Methodology

- 2.1. By law, Wandsworth Council is required to undertake a Habitat Regulations Assessment (HRA) on local development planning documents and projects. 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
- 2.2. For the purposes of HRA, the proposal is a plan (the WLPPR) which sets out future activities or development in the London Borough of Wandsworth. HRA screening checks if the plan is likely to have a significant effect on European Sites' conservation objectives. Where they do not, the Council do not need to progress to the Appropriate Assessment stage.
- 2.3. The HRA process to date has been informed by, or involved, the preparation of a series of documents including the [Integrated Impact Assessment \(IIA\) Scoping Report December 2018](#), the [Habitat Regulations Assessment \(HRA\) of the Pre-Publication Local Plan \(Regulation 18\) October 2023](#), the [Habitat Regulations Assessment of the Publication Local Plan \(Regulation 19\) January 2025](#), and this Addendum report.
- 2.4. The HRA process to date has not identified any likely significant effects or impacts on the integrity of any European Site. Consistent with the approach taken in the 2018 Integrated Impact Assessment, and affirmed in subsequent HRA work and consultation, including with Natural England, only Wimbledon Common SAC and Richmond Park SAC have been considered as part of the HRA. Other European Sites within 15km have been descoped.

¹ Main modifications are material changes to the submitted plan which are necessary to make it 'sound' and/or legally compliant.

- 2.5. The methodological approach to HRA included in this HRA Addendum remains consistent with that undertaken as part of the WLPPR to date. For brevity, this methodology, and the detailed findings of past HRA, is not duplicated in this HRA Addendum, however this information is included within, or directly linked from, the [Habitat Regulations Assessment of the Publication Local Plan \(Regulation 19\) January 2025](#).
- 2.6. The HRA produced at the Publication stage (the Publication HRA) assessed the WLPPR policies against the methodology set out, including the criteria summarised in Table 1 below. As shown in Table 2 below, this assessment showed that the WLPPR policies will have no adverse impact on Wimbledon Common and Richmond Park SACs. Consequently, there are no essential recommendations made.

Table 1 Criteria to assist in determining adverse effects on European Sites

Category	Ref	Explanation
A: No negative effect	A1	Policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy.
	A2	Policies intended to protect the natural environment, including biodiversity.
	A3	Policies intended to conserve/enhance the natural/built/historic environment, where enhancement measures will not be likely to have any negative effect on a European Site.
	A4	Policies that positively steer development away from European sites and associated sensitive areas.
	A5	Policies that would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
B: No Significant effect	B	Effects are trivial or 'de minimis', even if combined with other effects
C: Significant effect alone	C1	The option, policy or proposal could directly affect a European site because it provides for, or steers, a quantity or type of development onto a European site, or adjacent to it
	C2	The option, policy or proposal could indirectly affect a European site e.g. because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrologically or physically connected to it or it may increase disturbance as a result of increased recreational pressures

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Category	Ref	Explanation
	C3	Proposals for a magnitude of development that, no matter where it was located, the development would be likely to have a significant effect on a European site
	C4	An option, or policy that makes provision for a quantity / type of development (and may indicate one or more broad locations e.g. a particular part of the plan area), but the effects are uncertain because the detailed location of the development is to be selected following consideration of options in a later, more specific plan. The consideration of options in the later plan will assess potential effects on European Sites, but because the development could possibly affect a European site a significant effect cannot be ruled out on the basis of objective information
	C5	Options, policies or proposals for developments or infrastructure projects that could block options or alternatives for the provision of other development or projects in the future, that will be required in the public interest, that may lead to adverse effects on European sites, which would otherwise be avoided
	C6	Options, policies or proposals which depend on how the policies etc. are implemented in due course, for example, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European site
	C7	Any other options, policies or proposals that would be vulnerable to failure under the Habitats Regulations at project assessment stage; to include them in the plan would be regarded by the EC as 'faulty planning'
	C8	Any other proposal that may have an adverse effect on a European site, which might try to pass the tests of the Habitats Regulations at project assessment stage by arguing that the plan provides the imperative reasons of overriding public interest to justify its consent despite a negative assessment
D: Significant effect in combination	D1	The option/policy/proposal alone would not be likely to have significant effects but if its effects are combined with the effects of other policies/proposals provided for or coordinated by the LDD (internally), cumulative effects would be likely to be significant
	D2	Options, policies or proposals that alone would not be likely to have significant effects but if their effects are combined with the effects of other plans or projects, and possibly the

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Category	Ref	Explanation
		effects of other developments provided for in the LDD as well, the combined effects would be likely to be significant
	D3	Options or proposals that are, or could be, part of a program or sequence of development delivered over a period, where the implementation of the early stages would not have a significant effect on European sites, but which would dictate the nature, scale, duration, location, timing of the whole project, the later stages of which could have an adverse effect on such sites

Table 2 Assessment Outcomes of LPPR Policies

Policy		Likely to have an impact	Reason(s)	Essential recommendations to avoid adverse effect
LP23	Affordable Housing	No	A1, A5	None
LP24	Housing Mix	No	A1, A5	None
LP28	Purpose-Built Student Housing	No	A1, A5	None
LP29	Housing with Shared Facilities	No	A1, A5	None
LP30	Build to Rent	No	A1, A5	None
LP31	Specialist Housing for Vulnerable People and for Older People	No	A1, A5	None

- 2.7. The Publication HRA did not identify any significant adverse effects arising from the WLPPR policies alone. However, it acknowledged that Wandsworth does not sit in isolation and consideration should be made of the potential for effects in combination with any other proposal planned or underway and affects the same site that on its own also does not have a significant effect. Based on the scope of the WLPPR policies, and those in other authority areas, the Publication HRA concluded that there will be no likely significant 'in-combination' effects resulting from the WLPPR, and as such an appropriate assessment is not required.
- 2.8. The Publication HRA was consulted upon alongside the Publication version of the WLPPR in January and February 2025. The Council subsequently agreed a [Statement of Common Ground with Natural England](#) which was submitted alongside the WLPPR for Examination. This Statement of Common Ground, included, amongst other common ground, the following agreed statement:

The parties which are signatories to this Statement consider that the regulatory assessments, including the Habitat Regulations Assessment, have been undertaken appropriately in accordance with legislation and guidance.

- 2.9. No representations received at the Publication stage, or through participation at the Examination hearings, has expressed any doubt with the robustness or conclusions of the Publication HRA.

3. Purpose of HRA Addendum

- 3.1 This document (the HRA Addendum) comprises an addendum to the Habitat Regulations Assessment of the Wandsworth Local Plan Partial Review (WLPPR) which was submitted as part of the Local Plan Examination. This Addendum is limited in its scope to those matters described below but should be read alongside the [Habitat Regulations Assessment of the Publication Local Plan \(Regulation 19\) January 2025](#) for a full understanding of the methodological framework and outcomes of the HRA process that has guided the WLPPR.
- 3.2 Since the WLPPR examination hearings which took place between 4th and 6th November 2025, a number of Main Modifications to the WLPPR have been proposed by the Inspector. These Main Modifications are likely to be required to make the Local Plan ‘sound’². This HRA Addendum provides an assessment as to whether the proposed Main Modifications to the Local Plan are likely to have likely significant effects upon European sites, alone or in combination with other plans.
- 3.3 Consideration of each Main Modification is set out in Section 4. In every case, the Main Modification details the proposed modification and the reason for change, and an assessment of the implications of the modification on the HRA, if any, is provided in the final column.
- 3.4 The proposed Main Modifications are subject to public consultation from 26 November 2025 to 14 January 2026. This is a supporting document to the consultation, along with an update to the Sustainability Appraisal, and comments can be made on these supporting documents during the consultation period. Responses will be forwarded to the Inspector, who will take them into account before issuing their report.

² Plans are ‘sound’ if they are: (a) Positively prepared, (b) Justified, (c) Effective, (d) Consistent with National Policy

4. Consideration of Main Modifications and Implications for Habitats Regulations Assessment

4.1 The Main Modifications below are expressed by specifying the modification whereby additions are underlined, and removals are ~~strike through~~. The page numbers and paragraph numbering below refer to the Publication Local Plan Partial Review (as submitted), and do not take account of the deletion or addition of text.

Table 3 – List of Main Modifications and Implications for HRA

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Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Implications for HRA
MM1	<p>LP23 (Affordable Housing)</p> <p>Part D</p>		<p>This modification addresses concerns raised by a number of representors and at the hearing sessions about the general conformity of Policy LP23 with London Plan Policies H4 and H5 with respect to the applicable thresholds and circumstances in which a late-stage review will be applied.</p> <p>D. Applicants may use the Council's Fast Track Route set out in London Plan Policy H5, provided they meet the thresholds and requirements below and meet other Local Plan requirements.</p> <p>The threshold for affordable housing on gross residential development is:</p> <p>a. a minimum of 35-45%; or</p> <p>b. 50% for public sector land where there is no portfolio agreement with the Mayor; or</p> <p>c. 50% for Strategic Industrial Locations and Locally Significant Industrial Areas (LSIAs) in accordance with Policy LP34 (Managing Land for Industry and Distribution) and any non-designated industrial land that comes forward for residential uses in accordance with London Plan Policy E7 (Industrial intensification, co-location and substitution) where the scheme would result in a net loss of industrial capacity</p> <p>1. To follow the Council's Fast Track Route, major development proposals must meet all other criteria set out in Policy LP23. The Council requires a mix of 70% social rented housing (minimum) and 30% intermediate housing (maximum), and higher levels of social rented housing are strongly encouraged.</p> <p>2. Fast tracked development proposals providing between 45-50% affordable housing by habitable room are not required to provide a viability</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

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Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Implications for HRA
			<p>assessment at application stage, however, an early and late review mechanism will be applicable.</p> <p>3. 2. Fast tracked development proposals providing at least 50% affordable housing by habitable room are not required to provide a viability assessment at application stage and are not subject to a review mechanism, except where an agreed level of progress on implementation is not made within two years of the permission being granted, in which case an early-stage review will be triggered</p>	

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Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Implications for HRA
MM2	LP23 (Affordable Housing) Paragraph 17.11		<p>In response to representations, this modification would provide additional clarity over the interpretation of the phrase ‘net uplift’ in the context of Policy LP23</p> <p>The affordable housing policy applies to all new housing developments, including new builds changes of use to wholly residential and mixed-use sites incorporating residential use, where planning permission is required. Given the high level of need for affordable housing in the borough, the Council’s priority is to maximise the delivery of general-needs social rented housing. Where forms of housing are proposed which do not contribute to this need, they will only be considered appropriate if they meet a demonstrable and specific local need, which is supported by a clear evidence base. <u>Furthermore, proposals which propose the loss of existing affordable housing will not be acceptable unless applicants can clearly demonstrate that the loss of this affordable housing would facilitate the reprovion of at least the equivalent amount of affordable housing overall, by numbers of dwellings and/or habitable rooms, and an overall increase in the number of social rented dwellings and/or habitable rooms. The Council will look to secure this within permissions and legal agreements as appropriate.</u></p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

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Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Implications for HRA
MM3	LP23 (Affordable Housing) Part B		<p>This modification would resolve a potential anomaly in Policy LP23 whereby developments between 1 and 9 residential dwellings would potentially be expected to provide a financial contribution towards affordable housing irrespective of whether the proposal proposes to deliver affordable housing units on-site. This modification would establish an equivalency principle between on-site and financial contributions to improve the effectiveness of the policy.</p> <p>Developments delivering between 1 and 9 residential dwellings (gross) are required to provide a financial contribution to support the delivery of affordable housing in the borough. The level of contribution required will be £50,000 per unit on a gross basis (subject to indexation), unless at least 15% of the units would be provided as affordable housing on-site.</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>
MM4	LP23 (Affordable Housing) Paragraph 17.14		<p>See MM3.</p> <p>For the purposes of Policy LP23, ‘small sites’ are those which deliver between 1 and 9 dwellings (gross). It is recognised that on-site delivery of affordable housing would be difficult to achieve for a majority of small sites and so the policy envisages that affordable housing contributions from small sites will primarily take the form of a financial contribution. All small sites will be required to make a financial contribution of £50,000 per gross dwelling, subject to viability. However, in circumstances where it is proposed that a small site development would incorporate affordable housing on-site, no financial contribution will be required as long as at least the equivalent percentage of units (15%) would be provided as affordable housing on-site. Small site developments providing affordable housing on-site below the equivalent percentage of units (15%) will need to make a financial contribution equivalent to the difference between what is proposed and the equivalent percentage of units. All financial the contributions will be indexed annually in line with the Community</p>	

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Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Implications for HRA
			Infrastructure Levy using the BCIS All-in tender price index, and the level will be assessed on the validation date of a planning application and secured through a legal agreement.	

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Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Implications for HRA
MM5	LP23 (Affordable Housing) Paragraph 17.17		<p>In response to the plan-making reforms, February 2025, where it is confirmed that reforms will remove the role of Supplementary Planning Documents where the affordability criteria is normally referred to, the Council therefore considers it prudent to include this reference within the supporting text of the plan.</p> <p>Intermediate housing within the borough includes Shared Ownership and London Living Rent. <u>Intermediate housing should be delivered in compliance with the Council's Intermediate Housing Policy. The Council's latest affordability criteria and priority allocation for intermediate housing is included within the Council's Intermediate Housing Policy and annual Affordable Housing Update Report.</u> The Council's priority within this tenure is to deliver intermediate housing as London Living Rent as this tenure caters for households on a lower relative income. Applicants will need to justify to the Council where other forms of intermediate housing are proposed, including on viability grounds, particularly if the number of social rented units proposed are impacted. Shared Ownership is unaffordable to a majority of local residents with affordable housing needs and will therefore only be accepted if it facilitates the delivery of a higher number of social rented dwellings and/or habitable rooms and this will need to be clearly set out to the Council as part of any planning application.</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

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Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Implications for HRA
MM6	LP23 (Affordable Housing) Paragraph 17.18		<p>For consistency with MM1, modifications to Paragraph 17.18 are necessary to clarify the application of thresholds and review mechanisms. In response to representations, this modification would also clarify the role of mid-stage reviews in relation to Policy LP23 and resolve apparent inconsistencies between Part D.2 of the policy, Paragraph 17.18 of the supporting text and the London Plan.</p> <p>To incentivise housing delivery and conform to the London Plan, the Council's Affordable Housing policy sets out a Fast Track Route applicable within the borough. The Council's Fast Track Route has a minimum threshold of either 45-35% or 50% by habitable room depending on the type of site. Fast-tracked applications that provide between 45-50% affordable housing by habitable room, with the specified tenure mix within the policy will not be required to submit viability information at the planning application stage. However, they will be subject to an early stage review where an agreed level of progress is not made, and late-stage review, with a Mid-stage reviews may also be applicable at the discretion of the Council on large multi-phased developments. If an application provides 50% or more affordable housing by habitable room, with the specified tenure mix within the policy, applicants will not be required to submit viability evidence at planning application stage or be subject to a review mechanism, unless an agreed level of implementation is not made within two years of permission. All applications triggering Policy LP23, regardless of the affordable housing percentage provided, must provide the tenure mix specified within Policy LP23, unless there is compelling viability evidence to justify any deviation. The Council's approach reflects the general principles of London Plan Policy H5, however, viability evidence developed as part of the Local Plan Partial Review shows that a higher level of affordable housing can be achieved within Wandsworth, justifying a different threshold to that included within the London Plan.</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

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			<p>Policy LP23 is aimed at fast-tracking applications that provide the threshold level of affordable housing, progressing applications more quickly and removing time otherwise spent on complex viability discussions, seeking to embed affordable housing requirements into land values and help deliver a higher level of affordable housing more quickly. If sites are unable to provide the appropriate level of affordable housing, applicants must use the Viability Tested Route and provide the maximum viable level</p>	

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Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Implications for HRA
MM7	LP23 (Affordable Housing) Paragraph 17.20		<p>In response to representations, this modification would provide additional clarity over the interpretation of Part E of Policy LP23 which requires applicants to demonstrate how all potential public subsidy options for maximising affordable housing have been utilised.</p> <p>Applicants will be expected to demonstrate that all opportunities to secure public subsidy to deliver a greater number of affordable homes have been taken, particularly for any applications which are unable to achieve 50% without subsidy. This should include proactive and ongoing engagement with both the Council and Registered Providers at the earliest opportunity. The Council will support applicants to understand what public subsidy options may be available to them. Applicants should provide evidence with their applications to identify what public subsidy options have been sought and secured, and demonstrate the reasons why other public subsidy options have not been sought or secured. Evidence would include clear records of correspondence, meetings or applications with the Council, Registered Providers and/or funding providers. Public subsidy would include, but is not limited to, any form of grant and loan from a public body, land received at zero or discounted value, and other funding sources available to Registered Providers such as rent receipts, receipts from sale of land, sale of shared ownership properties or similar products, and other funding a Registered Provider may provide. Applicants must make clear the level of affordable housing that can be achieved with and without subsidy as part of any application. Guidance on use of public subsidy will be included in the Affordable Housing SPD and any successor document.</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

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Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Implications for HRA
MM8	LP23 (Affordable Housing) Paragraph 17.23		<p>In response to representations, this modification would provide additional clarity over the interpretation of requirements within Part A.2. of Policy LP23 which expects applicants to provide evidence of meaningful discussions with Registered Providers which have informed the proposal.</p> <p>The Council understands that securing a Registered Provider is a fundamental part of affordable housing delivery in most cases. Registered Providers are more likely to bid for affordable housing if they are engaged early. As a result, the Council will expect all developers to ensure that they identify and seek the Council's approval of a Registered Provider to support the delivery of affordable housing on site at the time of submission of a planning application. Applicants should seek to evidence this through providing records of discussions, meetings or agreements that have taken place. To confirm on-site deliverability and/or establish notional values of affordable units which reflect local housing market conditions, evidence should be provided of discussions with at least the Council's preferred Registered Providers (RPs), or any other RPs recommended by the Council (Not for Profit and demonstrating a high standard of management). In exceptional cases where applicants can demonstrate it has not been possible to secure a Registered Provider early, this must be demonstrated through the provision of clear evidence. More guidance will be set out in the Affordable Housing SPD and any successor document. The onus will be on applicants to pay for any viability assessment if the proposal is not policy compliant and any cost of an independent assessment. If build costs need to be assessed, then applicants will also need to pay for these to be reviewed by an independent Quantity Surveyor</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

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MM9	<p>LP23 (Affordable Housing)</p> <p>Paragraph 17.24</p>		<p>In response to representations, this modification would clarify the interpretation of “re-submitted” in the context of Paragraph 17.24, specifically to acknowledge that non-material amendment applications would not trigger additional early, mid or late-stage review mechanisms.</p> <p>All viability tested applications, and schemes which have been re-submitted for the Council’s consideration where the original permission did not meet the threshold or required tenure split, will be subject to the inclusion of early, mid and late-stage review mechanisms at appropriate stages/ milestone(s) of the construction period. This requirement would generally not include non-material amendments but may include applications to vary conditions where the application of affordable housing policy is relevant. Where reviews are required, these will be expected to follow the formula set out in the London Plan unless otherwise agreed by the Council.</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

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MM10	LP23 (Affordable Housing) Paragraph 17.25		<p>In response to representations, this modification would clarify that developments providing affordable housing below the full requirements of the policy will not be resisted provided that this is agreed through the Viability Tested Route.</p> <p>Affordable housing will be secured on-site by way of a legal agreement. To incentivise developers to build out their permissions in a timely manner, an early-stage review will be inserted into all legal agreements securing affordable housing with a trigger date of 24 months after the date of the decision. <u>Other than where agreed through the Viability Tested Route,</u> the Council will strongly resist any development which provides less than a policy compliant offer of affordable housing on site</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>
MM11	LP24 (Housing Mix) Part E		<p>In response to representations, this modification would allow proposals for specialist accommodation to evidence a housing mix need that differs from the preferred housing mix set out in the policy.</p> <p><i>[New bullet point]</i></p> <p><u>5. In the case of specialist forms of housing falling within Use Class C3, the particular need for that form of housing where this is shown to differ to the preferred housing mix.</u></p>	<p>No change in HRA findings – the policy as modified would not affect the overall scale or location of development arising from the Plan.</p>
MM12	LP28 (Purpose Built Student Accommodation) Part A.1		<p>In response to matters raised at the hearing sessions, this modification would clarify the meaning of Policy LP28 with respect to Part A.1. and create consistency with similar criteria within the development plan. It is necessary to avoid unduly restricting the ability for Purpose-Built Student Accommodation to come forward to sites</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or</p>

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			<p>that are unsuitable for conventional housing and instead applies a less restrictive criteria as to whether a proposal would compromise a site's capacity to meet the Borough's need for conventional dwellings.</p> <p>Is proposed on a site which is not suitable for conventional housing</p> <p>Would not compromise a site's capacity to meet the Borough's need for conventional dwellings:</p>	location of development arising from the Plan.
MM13	<p>LP28 (Purpose Built Student Accommodation)</p> <p>Paragraph 17.44</p>		<p>In response to representations, this modification would clarify that proposals to deliver the required contribution to conventional affordable housing on-site may be considered compliant with the policy in appropriate circumstances, including where this would be within a separate block.</p> <p>In exceptional circumstances where a student housing development is considered appropriate proposed on a site which could accommodate some conventional housing in a separate block, the equivalent level of affordable housing as required by Policy LP23 should may instead be provided as a separate block on the site as part of the scheme and phased accordingly</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>
MM14	<p>LP28 (Purpose Built Student Accommodation)</p> <p>Paragraph 17.45</p>		<p>This modification is necessary for consistency with MM12. This modification would provide clarification as to how Part A.1. would be interpreted, with reference to the consistency of a proposal with the expected land use of the site, the balance of needs for student and conventional housing and the extent to which either or both needs are being met within the Borough and across London.</p> <p>Proposals for new student accommodation which will prioritise supporting HEPs (Higher Education Providers) located within Wandsworth will be</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

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			supported provided that they do not compromise a site's capacity for conventional housing accepted on sites that are not suitable for conventional housing, such as a site located within an existing HEP campus, where conventional housing would be inappropriate. In determining whether a proposal would compromise a site's capacity for conventional housing, the Council will have regard to the expected land use of the site as identified in any specific site allocation and area strategy policies, the existence of any extant consents for conventional housing on the site, the most up to date evidence on the need for student housing and conventional housing, and the extent to which each need is being met within the Borough and across London, having regard to the Council's most up to date Authority Monitoring Report and GLA monitoring reports.	
MM15	LP28 (Purpose Built Student Accommodation) Paragraph 17.43		<p>In response to representations, this modification would clarify how the affordable housing requirements within the policy would support the Fast Track Route set out in Policy LP23 and the London Plan, and provide additional clarity on the Council will interpret the policy where developments cannot viably provide a fully policy-compliant contribution towards both affordable student housing and conventional affordable housing. In particular, the modification would establish a clearer prioritisation between the two which will improve the policy's effectiveness.</p> <p>The financial contribution should be calculated on the basis of the difference between the Gross Development Value including the relevant policy requirement of affordable habitable rooms, and the Gross Development Value of the scheme with no affordable habitable rooms provided, subject to viability. <u>Developments must provide a fully</u></p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

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			compliant contribution to both affordable student housing and conventional affordable housing to be eligible for the Fast Track Route set out in Policy LP23 (Affordable Housing). Where a development cannot viably provide a policy-compliant contribution towards both affordable student housing and conventional affordable housing, applicants must provide viability evidence in line with Policy LP23. Developments will be expected to first maximise their contribution towards conventional affordable housing, and any surplus above reaching full policy-compliance to conventional affordable housing should be used to then maximise their contribution towards affordable student housing. More guidance will be set out in the Affordable Housing SPD and any successor document. Proposals for student accommodation should ensure that this financial contribution is prioritised	
MM16	LP28 (Purpose Built Student Accommodation) Part A.8.		In response to representations, this modification would clarify Part A.8. of the policy to make clearer that making facilities available to the wider community will be subject to feasibility, acknowledging a concern raised by some representors that safeguarding considerations restrict the ability to make certain facilities available to the public. 8. Can make facilities provided for student residents available to the wider community, <u>where feasible</u> , particularly where there is an acknowledged shortfall in such provision within the neighbourhood;	No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.
MM17	LP28 (Purpose Built Student Accommodation) Part B		In response to matters raised at the hearing sessions, this modification would make it clearer how proposals resulting in the loss of existing student accommodation will be considered, improve internal consistency and apply clearer and better-defined tests.	No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.

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			<p>B. The loss of existing student accommodation will be permitted when it is demonstrated that the facility no longer caters for current or future needs and: the floorspace is replaced by another form of residential accommodation that meets other Local Plan housing requirements. Proposals for a change of use of existing student accommodation which result in the net loss of student residential floorspace will only be permitted when:</p> <ol style="list-style-type: none"> 1. The loss of student accommodation housing would be replaced by another form of housing for which there is an identified need; priority housing need; or 2. The loss of student accommodation would be solely at ground floor level; and <ol style="list-style-type: none"> a. The development would replace the ground floor student accommodation with appropriate active ground floor town centre uses as defined in the glossary; and b. The proposed ground floor uses would pass the sequential test for main town centre uses in accordance with Policy LP43 (Out of Centre Development) 	
MM18	<p>LP29 (Housing with Shared Facilities)</p> <p>Part D.3.</p>		<p>In light of MM1, this modification is necessary to make clear that large-scale purpose built shared living proposals will be subject to an affordable housing contribution equivalent to 50% of units and not those thresholds set out in a modified Policy LP23, in light of the</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or</p>

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			<p>Council's evidence justifying a higher contribution towards affordable housing from this type of housing.</p> <p>Provide a financial contribution towards the provision of affordable housing in the borough, equivalent to the corresponding threshold level set out in Policy LP23(Affordable Housing) 50% of units to be provided at a discount of 50% of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy LP23, and any proposals which do not provide a contribution equivalent to at least 50% of units will be subject to review mechanisms (early, mid and late-stage)</p>	location of development arising from the Plan.
MM19	<p>LP30 (Build to Rent)</p> <p>Part A.1.a.</p>		<p>In response to representations, this modification would make it clearer that the remaining 30 per cent of affordable housing required under Policy LP30 should be available at a range of intermediate rents, in line with the London Plan.</p> <p>It would also substitute the term 'low cost rented' with 'social rented' to resolve internal inconsistency.</p> <p>Where a development has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide low cost social rented housing to be managed by a registered provider. To follow the Council's Fast Track Route, 70 per cent of the overall affordable housing requirement should be provided as social rented units within this separate core and/or block, with the remaining 30 per cent at a range of genuinely affordable intermediate rents to meet priority housing need in Wandsworth</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

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MM20	LP31 (Specialist Housing) Part A.		<p>In response to representations, this modification would clarify the interpretation of Part A of Policy LP31 in relation to the phrase “priority housing”, in particular to insert a clearer test for proposals relevant to this clause.</p> <p>Where the loss of existing specialist and supported housing is proposed and satisfies the requirements of Part A, proposals for re-use or re-development of this housing will be supported where they would contribute to meeting deliver another form of priority housing for which there is an identified need (including social rent)</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>
MM21	LP31 (Specialist Housing) Paragraph 17.71		<p>Modification required for consistency with MM20</p> <p>This policy seeks to resist the loss of various forms of specialist accommodation so that the level of provision in the borough is not reduced. However, the Council recognises the changing nature of care provision for older, vulnerable and homeless people. Where existing specialist accommodation does not meet modern standards or local need, the Council will support its re-provision or modernisation to ensure the provision of high-quality specialist accommodation which better meets the needs of older, vulnerable and homeless residents. The particular circumstances of each site will be taken on its own merits when considering the Council’s preference for no net loss of existing floorspace. Proposals to re-use or re-develop specialist housing will be expected to prioritise the use of the site to deliver other forms of housing for which there is an identified local need, with particular emphasis on contributing towards genuinely affordable housing and social rented housing.</p>	<p>No change in HRA findings – the policy as modified sets criteria for new development, including the type of housing to be delivered, but would not affect the overall scale or location of development arising from the Plan.</p>

5. Conclusion

- 5.1. This HRA Addendum has assessed the proposed Main Modifications to the Publication version of the Wandsworth Local Plan Partial Review (WLPPR) and has concluded that the findings of the HRA produced at the Publication stage remain consistent and robust.
- 5.2. The conclusions of the HRA remain that the WLPPR, taking into account the HRA undertaken at the Publication stage and this HRA Addendum, is not likely to have adverse effects on the integrity of European sites, either alone or in-combination with other plans or projects. This is largely a consequence of the fact the policies within the WLPPR, inclusive of proposed Main Modifications, do not themselves materially affect the scale or location of development arising from the plan, being instead policies which set criteria for new development to meet.
- 5.3. This HRA Addendum will be available for consultation alongside the proposed Main Modifications the WLPPR. Following the consultation on the proposed Main Modifications and this HRA Addendum, the Inspector will consider the representations raised and report on the modified WLPPR's soundness.