

Our reference: MGLA061124-4365

26 November 2024

Dear

Thank you for your request for information which the Greater London Authority (GLA) received on 5 November. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

**You requested:**

I'd like to make an FOI (actually probably an EIR) request for information relating to planning application Ref. 22/00300/FUL, which pertains to 100 Woodgate Drive, London SW16.

I'd like to receive a copy of representations made to you in relation to the Stage 2 referral of this application, which concluded last month.

The representations I'm interested in are those that you have listed on p8 of your report (Planning report /2022/0355/S2, 21st October 2024) as coming from politicians:

Representations from politicians

23. The Mayor received representations from politicians including Marina Ahmad AM (London Assembly Member for Lambeth and Southwark); Zoë Garbett AM (London Assembly Member, London-wide); Councillor Scott Ainslie (London Borough of Lambeth, Streatham St Leonards ward); Councillor Danny Adilypour (London Borough of Lambeth, Streatham Common and Vale ward); Councillor Nicole Griffiths (London Borough of Lambeth, Streatham St Leonards ward); and the Streatham and Croydon North Conservatives.

In addition to those listed, I should like to receive a copy of any representations received in relation to this planning matter from Steve Reed MP; Neil Garrett AM; Councillor Sarah Cole (Lambeth, Streatham Common and Vale); Councillor Dominic Armstrong (Lambeth, Streatham Common and Vale).

(I'm asking for these as they are particularly relevant and may have made representations to you – and because you say “from politicians including...”, suggesting that your list may not be comprehensive.)

**Our response to your request is as follows:**

# GREATER**LONDON**AUTHORITY

Please find attached the information the GLA holds within the scope of your request.

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA061124-4365.

Yours sincerely

## **Information Governance Officer**

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

## **Planning application Ref. 22/00300/FUL (Woodgate Drive)**

Copies of representations:

- Councillor Danny Adilypour (London Borough of Lambeth, Streatham Common and Vale ward)
  - Councillor Nicole Griffiths (London Borough of Lambeth, Streatham St Leonards ward)
  - Zoë Garbett AM (London Assembly Member, London-wide)
  - Marina Ahmad AM (London Assembly Member for Lambeth and Southwark);
  - Councillor Scott Ainslie (London Borough of Lambeth, Streatham St Leonards ward)
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Dear xxx

I understand that Marina Ahmad AM has requested that the planning application for 100 Woodgate Drive (GLA Application Reference 2022/0224/S1/01) is called in by the Mayor for further consideration.

Could you please confirm that this call-in request has been received and is under consideration? Is there a timescale yet on when a decision will be made on this?

You will also note that over 400 of my residents in Streatham Common & Vale ward have submitted objections to this application on the GLA planapps portal. Will these objections now be reviewed by you and a summary presented to the Mayor as part of the call-in consideration process?

As the local ward councillors we submitted our own objections to this planning application and I have submitted my own further objection to the GLA, highlighting the breaches of London Plan policy within this application, namely the failure to maximise tenure integration by segregating the social housing in a separate block and this block being of a lower quality single aspect design, when policy D6 of the London Plan states that single-aspect

properties should be avoided. I'd be grateful if you could confirm that these points will be presented to the Mayor for him to consider when deciding whether he will call this application in.

I look forward to hearing from you.

Best regards,

Danny

Councillor Danny Adilypour

Streatham Common & Vale

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Dear Mayor Khan,

Cllr Ainslie and I are writing to you on behalf of local residents who live both in, and adjacent to, our ward - Streatham St Leonard's in South Lambeth, to ask for you to call in for review the planned development at 100 Woodgate Drive, SW16 (Ref 22/00300/FUL). We add our voices to all those that have expressed their view that, if it goes ahead as planned, the development will have a devastating and detrimental effect on our local area.

Unfortunately, the voices of the local community were not listened to by the Labour Councillors who approved the development at the Planning Application Committee on 19th March 2024. Well over 1000 residents petitioned the council prior to the meeting, and nearly 1000 residents submitted detailed submissions opposing it during the consultation period.

Additional objectors to the scheme include Bell Ribeiro-Addy MP, Ward Councillor and Streatham Common & Vale & Cabinet Member for Growth & New Homes Cllr Danny Adilypour, the GLA Candidates for Lambeth, Marina Ahmed, Claire Sheppard and Christine Wallace, the Streatham Society and ward councillors, including ourselves.

Objections focus on the height, scale and density of the development which make it wholly unsuitable for the area and in breach of several legal requirements including:

- Seeks to segregate the social housing element of the scheme, something which the GLA has previously deprecated and rejected in other applications
- Breaches of the Lambeth Local Plan
- Impact on Immanuel church heritage site and protected Streatham Common view
- Impact on parking with lack of CPZ and only 2 parking bays
- Marginalisation with affordable homes crammed on top of the railway with no access to the playgrounds reserved for private residents only via roof top access
- Impact on light and privacy on local residents
- Impact on local infrastructure - lack of plans to mitigate that impact

We are not opposed in principle to the building of truly affordable homes that are sustainably built for the long term, with the occupants comfort and safety a priority. This scheme however, in its current form, seeks to use the mantra 'more affordable homes' to gloss over the very significant flaws and breaches within the proposal, and to maximise the profits of Hadley Property Group.

I implore you to consider these submissions and consider exercising your power under Article 6 or 7.

Best wishes,

Nicole & Scott

Councillors Nicole Griffiths and Scott Ainslie

Green Party – Streatham, St Leonard's Ward

London Borough of Lambeth

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Please find below correspondence from Zoë Garbett AM, in reference to the meeting on 21 October 2024 to take the Stage 2 Decision for this planning application.

Dear Mayor,

I am writing to ask you to direct the London Borough of Lambeth to refuse the application for the proposed development on the site of 100 Woodgate Drive, Streatham (Ref. 22/00300/FUL), echoing the objections of more than 600 local residents, local councillors and MP.

The local community have made their views against this planning application clear, as described in detail in the attached letter, some of which I summarise here:

- The excessive height and scale of the proposed four blocks, with one of them being 14 storeys high, which would cause substantial harm to the surrounding low-rise properties most of which comprise semi-detached and terraced housing;
- Segregation of tenancies, with “affordable homes” separated from the more upmarket units;
- Children’s playgrounds proposed to be on the roof, due to the lack of space at ground level;
- Many of the affordable flats are single aspect, which is against the London Plan, Policy D6 Housing quality and standards, Part C.

I would also like to draw your attention to the lack of truly affordable housing, as the proposed development does not include any homes for social rent, your preferred affordable housing tenure. The proposed 35 per cent affordable housing by habitable room, comprising 70 per cent London Affordable Rent and 30 per cent shared ownership, is not acceptable at this time of urgent housing need at the most affordable level in London.

I ask you to refuse this application and ask Lambeth Council to engage their residents in any further planning proposals so they can be co-developed by the community.

Thank you for taking the time to consider this objection.

## **Marina Ahmad AM**

London Assembly Member for Lambeth and Southwark

**Sadiq Khan**  
**Mayor of London**  
**City Hall**  
**Kamal Chunchie Way**  
**London E16 1ZE**



**Marina Ahmad AM**  
City Hall  
Kamal Chunchie Way  
London E16 1ZE

**28<sup>th</sup> March 2024**

Dear Sadiq,

**RE: 100 Woodgate Drive, Streatham**  
**Lambeth Planning Application: 22/00300/FUL**  
**GLA Application Reference: 2022/0224/S1/01**

I am writing to you regarding the planning application for 100 Woodgate Drive in Lambeth in my constituency.

I have concerns around the proposed design of the scheme, as it would appear that only one of the blocks will contain any affordable housing provision. The 2021 London Plan is quite clear that tenure integration should be maximised, therefore by having the affordable housing in a different block, it would be segregating those residents from those whose properties would be sold as private sales.

Furthermore, the proposal would see this block being constructed as single-aspect, which goes against Policy D6 of the London Plan, which states that single-aspect properties should be avoided.

Can I also bring to your attention concerns raised by my constituents over the bulk and massing of the proposed development, specifically the proposed four towers that they see as out of proportion with other buildings in the local area.

Residents living on Woodgate Drive, Glenister Park Road and Ellison Road have concerns relating to direct overlooking, overshadowing and creating an undue sense of enclosure.

Lambeth Council's Planning Committee granted planning permission at its meeting on 19th March 2024 and it will now come back to you for consideration at the GLA once the developer has concluded negotiations on the Section 106 Agreement.

Given the concerns outlined above, I ask if you could call in the application.

I look forward to reading your response on this important matter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Marina Ahmad', is placed within a light grey rectangular box.

**Marina Ahmad AM**  
**London Assembly Member for Lambeth and Southwark**

26th June, 2024

Dear Sadiq Khan, Mayor of London,

**RE PLANNING APP: 100 WOODGATE DRIVE, STREATHAM GLA/2022/0224 (LBL ref: 22/00300/FUL)**

I am a Lambeth Green councillor representing a ward in Streatham adjoining the ward of the application, and I'm a member of Lambeth's Planning Applications Committee. I voted against granting approval for this application in March, and remain implacably opposed to it, as do other members of my ward and members of the ward of the application, who represent both Labour and Greens.

I strongly object to this application because it fails to meet the requirements of a number of key policies in the London Plan and Local Plan, particularly with regard to height, bulk and massing, and is clearly a massive overdevelopment of the site.

### **Tall Buildings**

The proposed development is prima facie a departure from the London Plan regarding tall buildings.

LP Policy D9 states that "Tall buildings should only be developed in locations that are identified as suitable in Development Plans." (my emphasis)

The application proposes three tall buildings up to 81m in height in locations not identified in an up to date Local Plan. The application is therefore contrary to Policy D9 part B. This is clearly stated in the GLA Stage 1 report.

The GLA's position was not reported to Lambeth's Planning Applications Committee. The application was not advertised or assessed as a departure application as required by article 15(3) of the Development Management Procedure Order and under article 32 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 respectively, the latter requiring a referral to the Secretary of State.

**This is not some odd anomaly.** In preparing their Local Plan, Lambeth Council rigorously undertook the steps set out in LP policy D9 to identify locations suitable for tall buildings. Not only was 100 Woodgate not so identified, nowhere in Streatham or anywhere south of the South Circular was so identified as suitable for a tall building - despite the fact that the bar of what constituted a tall building was set lower in the southern part of Lambeth at 25m.

**Nor is the breach marginal.** The proposed towers are at least double the trigger point for the definition of a tall building.

**Nor is the failure to identify the location as suitable for tall buildings accidental or an oversight.** Lambeth's draft Revised Local Plan was consulted on from 31 Jan 2020. A tall buildings justification Topic Paper was published in May 2020. The Examination

hearings began on 27 October 2020. Lambeth told the Inspector at the examination that “the forthcoming Site Allocations DPD will allow for further testing of some sites outside of the locations identified”. A draft Site Allocations DPD (an addition to the Local Plan) was first published in Jan 2022. The Regulation 19 was published in February 2024.

Nowhere in the Examination or any of those documents was this location mentioned, despite the fact that the first formal pre-app meeting between Lambeth and the applicant was on 14 April 2020, prior to the publication of the Reg 19 and the Tall Buildings Topic Paper which identified locations suitable for tall buildings. Furthermore, the scheme had progressed sufficiently for it to be presented to Lambeth’s Growth and Investment Panel (chaired by the Leader of the Council) in July 2020, who agreed in principle support - two years before a draft Site Allocations DPD!

In fact the applicant states that as early as 2020

*“Officers supported the principle of redeveloping the Site and agreed with the strategy of placement of height in the centre...Officers requested that additional detail be included with subsequent pre-application submissions: • Justification for the provision of tall buildings in accordance with draft policy Q26”.*<sup>1</sup>

Therefore there was ample opportunity for 100 Woodgate to be proposed as suitable for a tall building and inserted into the plan-making process prior to submission for examination in 2020, or in the submission Site Allocations DPD in 2024. [NB the fact that the application was live is irrelevant: locations were identified in that process which were the subject of live planning applications e.g. SA DPD Site 1 Royal St: 22/01206/EIAFUL.]

In justificatory text for Lambeth Local Plan Policy Q26 Tall Buildings in the Local Plan it is explained

*“From time to time windfall sites may provide the opportunity for tall building development in locations that have not been anticipated through the plan led process. Part (b) of this policy is intended to deal with these situations.”*<sup>2</sup>

This is clearly not a ‘windfall’ site - the council has been fully aware for over four years of tall building proposals for this site coming forward.

The local authority’s approach has been entirely contrary to the spirit as well as the letter of LP Policy D9. This approach - of being aware of a location proposed for tall buildings during the plan-making process, but failing to consider it within the plan-making process and remaining silent, only to then approve it despite this - completely undermines the plan-led requirement set out in the London Plan. **For that reason the application must be called in by the Mayor.**

The local planning authority seeks to pretend that the application is a ‘windfall’ and assesses the application against Policy Q26 Part B, which requires applicants

*“to provide a clear and convincing justification and demonstrate the appropriateness of the site for a tall building having regard to the impact on heritage assets, the form, proportion, composition, scale and character of the immediate buildings and the character of the local area (including urban grain and public realm/landscape features) and ensure points (a) (i) - (vi) are met. In addition: i. proposals for tall buildings will only be considered acceptable in established low rise residential neighbourhoods where they are part of a comprehensive scheme which integrates well with the locality.”*

Points (a) (i) - (vi) are  
*will not adversely impact on strategic or local views;*

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<sup>1</sup> Planning Statement (Revised) 3.3.3

<sup>2</sup> 10.130

*design excellence is achieved (form, proportion, silhouette, detailing and materials etc.);*  
*makes a positive contribution to public realm and townscape including at street level, whether individually or as part of a group;*  
*where proposed near existing tall building groups, proposals should follow the established principles of group composition such as noticeable stepping down in height around cluster edges;*  
*the proposal adequately addresses the criteria in London Plan policy D9C in terms of acceptable visual, environmental and functional impacts including microclimate, wind turbulence, noise, daylight and sunlight, reflective glare, aviation (including the safeguarded zones around Heathrow Airport, London City Airport, Battersea Heliport and the helipad at Kings' College Hospital), navigation and electronic communication or broadcast interference;*  
*it can be shown that the site can accommodate the uses and quantum of development proposed in terms of meeting acceptable standards of amenity, access, transport accessibility and servicing"*

London Plan Policy D9 Part C requires development proposals address key impacts: visual impacts

a) the views of buildings from different distances

- i long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views
- ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality
- iii immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding

c) architectural quality and materials...

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm...

3) environmental impact: a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building...

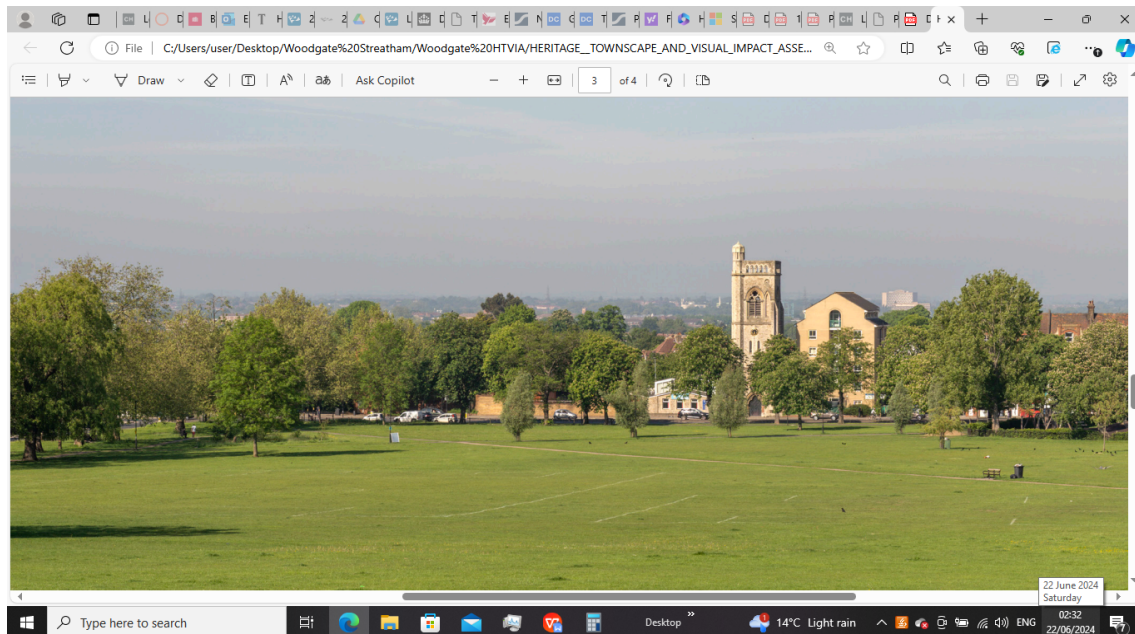
### **The long range view of the building**

The most negative impact is that on the protected view from the high slopes of Streatham Common, a designated Local Panorama. This is one of only two protected Panoramas in all of Streatham, afforded by the higher parts of the Common. The objective of providing protection for the Panoramas identified in the Local Plan "is to ensure that no foreground or middle- ground development is intrusive, unsightly or prominent in relation to the panoramic view as a whole, or landmark buildings within".<sup>3</sup>

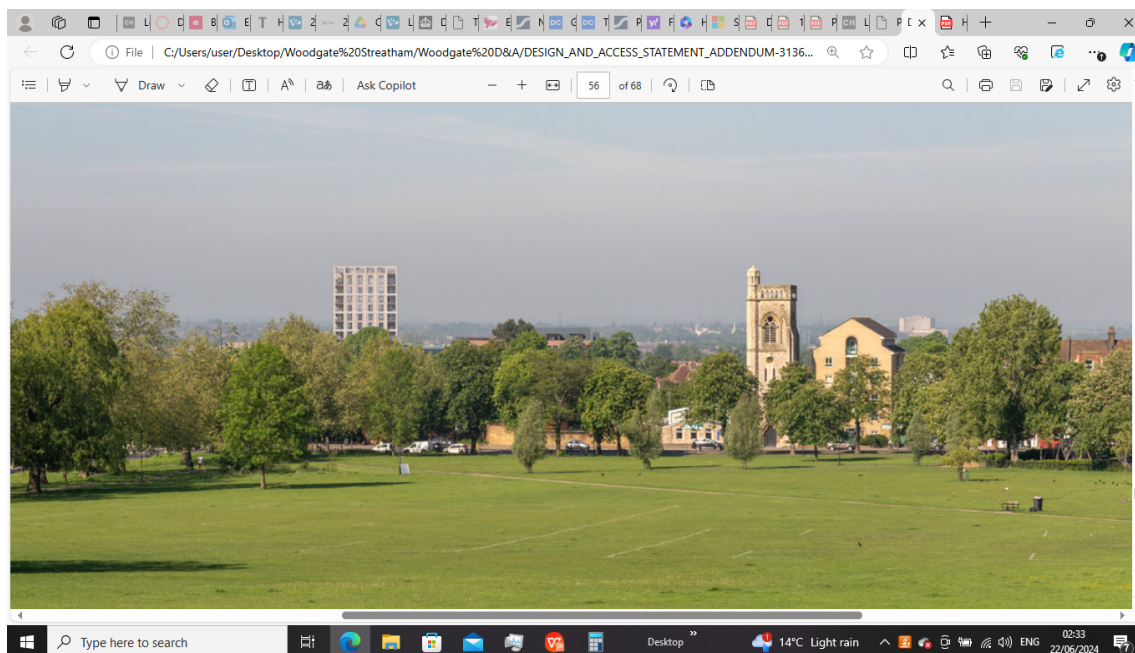
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<sup>3</sup> LLP Policy Q25 Views Part C

The existing view across the Metropolitan Open Land is protected from the urban areas beyond by a line of tall mature trees. The only building properly visible is the listed Gothic Revival of Immanuel Church tower, designed nearly 200 years ago as a landmark to be visible emerging from the idyllic green open expanse, with St John's House beside it. Other buildings are barely perceptible, being below the tree line, apart from one taller building rising the very far distance.



The application would result in the upper six storeys of Block C and the upper storeys of Block A of the proposed development would be entirely visible in this protected Panorama, fatter and taller than the listed church tower and competing with it for the visual focus; yet clearly considerably further away - it is in fact double the distance of the church from the viewer, making its appearance oddly out of scale with the listed church tower and mature trees, and thereby confusing the viewer: is it in the middle distance or further away?



The applicant's HTVIA claims that this impact is not incongruous since  
*"the proposed development will appear consistent with the dense urban environment emerging in London and which already makes up the setting of the Common and locally listed buildings, albeit outside of this view".*

This is wrong on two fronts: firstly, the surrounding area largely hidden in this view is not a “dense urban environment” but a low-rise relatively low-density sprawling suburbia; and secondly, it is precisely the fact that the urban realm beyond the Common is largely invisible and barely hinted at beyond the listed Church which makes this an unusually appealing vista, and is why it receives specific attention in the Local Plan policy on protected views.

The enormity and incongruity of this development is fully felt when considering the impact on neighbouring streets, which are dominated by sky and greenery, as befitting of any graceful suburb. The impact will be to transform the feeling of a suburb into one of an inner city. The termination of views which are evidenced in View 10 and 12 is more akin to inner urban area such as Stockwell, rather than the outer suburban feel of Streatham.

### **Environmental Impact: Daylight & Sunlight**

The amenity of existing residents in terms of daylight is protected by LP Policy D6 Housing quality and standards Part D<sup>4</sup>. The text at 3.6.11 specifically refers to GLA guidance on design and daylight.

The Housing Design Standards LPG refers to the BRE guidance (‘Site layout planning for daylight and sunlight’). The assessment “process involves a two-stage approach: firstly, by applying the BRE guidance; and secondly, by considering the location and wider context when assessing any impacts.”<sup>5</sup>

Policy Q2 of Lambeth’s Local Plan similarly refers to the BRE guidance when determining the “unacceptable impact on levels of daylight and sunlight on the host building or adjoining properties including their gardens or outdoor spaces”.

The BRE guidance states that if the Vertical Sky Component (VSC) “is greater than 27% then enough skylight should still be reaching the window of the existing building... Any reduction below this level should be kept to a minimum. If the VSC, with the new development in place, is both less than 27% and less than 0.80 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear gloomier, and electric lighting will be needed more of the time.”<sup>6</sup>

### **Assessment**

Of the neighbouring homes assessed by the applicant:

- 279 windows fail the BRE test of 27% VSC adequate to light a room
- 99 windows would lose more than 20% of their daylight (i.e. do not retain 0.80 times their value before development)
- 83 windows fail both tests, the BRE benchmark.

Clearly that would be a significant number of affected properties where the daylight would be noticeably worse and will require electric lighting more of the time as a result of the application, and could adversely affect the mental and physical health of existing occupants.

A large number of properties on Ellison Rd and Woodgate Drive would be affected, but some residential property would descend into considerable gloom, such as the block of **12 flats at 84-95 Woodgate Drive** where

- More than two-thirds of the windows (35 out of 49) would achieve less than adequate daylight (27% VSC)
- A quarter of the windows would achieve less than 15% VSC (i.e. less than half that considered adequate by the BRE)

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<sup>4</sup> “D: The design of development should provide sufficient daylight and sunlight to new and surrounding housing

<sup>5</sup> 4.1.2

<sup>6</sup> 2.2.7

Half of the windows would lose more than 20% of their existing daylight, some up to 37% of their current daylight

Nearly half of the windows (23 out of 49) would fail both tests

Most of the windows at homes along **Glenister Park Rd (1-33)** would lose around a third of their existing daylight and would fail both tests:

Most windows (62 out of 74) would achieve less than adequate daylight

90% (66 out of 74) would lose at least 20% of their existing daylight, with losses averaging around a third of their existing daylight

80% of windows (59 out of 74) would fail both tests

## Context

The BRE guidance allows for flexibility: clearly the existing daylight in a high-density urban area with tall buildings or tight medieval streets would be often worse than that judged adequate by the BRE. Lambeth's independent assessment (by Delva Patman Redlar) cites as potential benchmarks examples of schemes which were considered acceptable by Inspectors despite failing the BRE standards, such as in inner-urban areas of the Whitechapel Estate Appeal and the Graphite Sq Appeal. The former is in one of the oldest and densest parts of London, full of narrow streets with terraced houses built directly onto the road and without gardens; the latter (Graphite Sq) is in the Central Activities Zone and within the VNEB Opportunity Area close to Albert Embankment, surrounded by tall buildings.

Neither of these examples are remotely related to the application site, which is deeply suburban, in an area of mainly 2 storey buildings, with occasional three storey buildings, laid out along spacious leafy streets with front and back gardens and car parking. There are no tight historic streets, and no tall buildings in a 4 mile stretch between Brixton and Croydon, with Streatham Vale about halfway between.

It is difficult to imagine an area where the BRE daylight standards would be more appropriate.

It is also notable that DPR cherry picks their context: other notable cases in Whitechapel and at Albert Embankment were refused by the Secretary of State on issues of daylight<sup>7</sup>: as ministerial decisions they should carry more weight. In the Whitechapel case the Secretary of State concluded that the fact that many existing neighbours would experience "a gloomier outlook than they do at present", and that a large number of windows would be affected, was a harmful impact that carried "substantial weight" against the application.

## Quality of design: communal garden/amenity space/ children's playspace

There are a series of small spaces between the tall buildings, which function as the main thoroughfare for the hundreds of residents entering and leaving the buildings. The applicant claims that these will also function as communal gardens providing greening, flowers, and seating as well as children's playspaces for various ages and fitness areas.

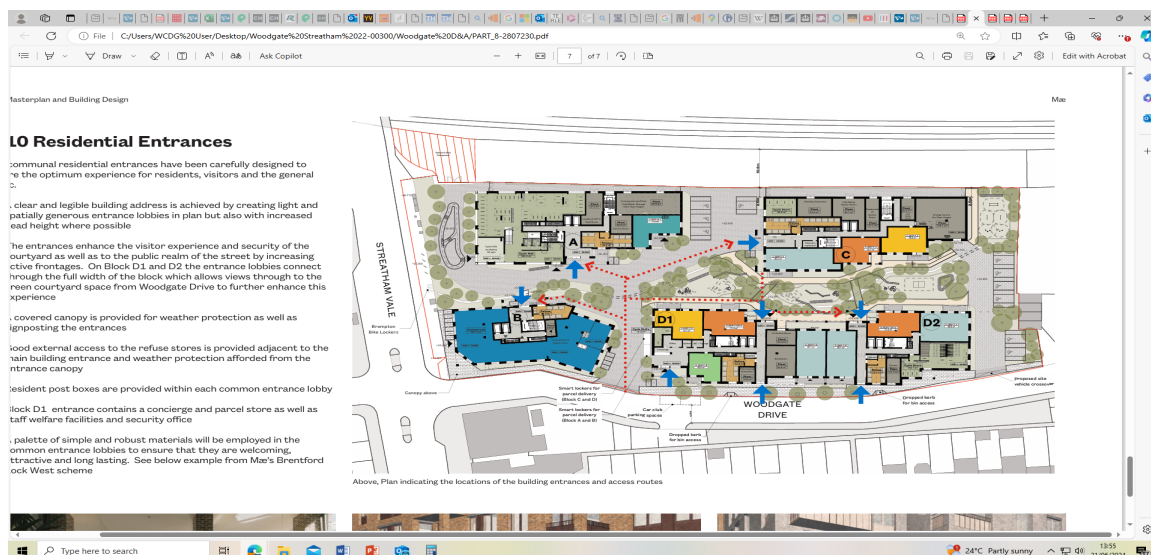
Questions were raised about these spaces by the Design Review Panel:

*"The Panel thought that the absence of other play space within a 400m radius of the site could mean the proposed play space is heavily used by the surrounding community and not just future residents. As such, there should be careful consideration on the type of play proposed and what it offers to the community and residents. The applicant should also consider how play space works and interacts with the proposed commercial units. More generally, the Panel were concerned about the location and quality of play space which would be in full shade. Play space within the residential courtyard and how it integrates in the landscaping should be carefully considered by the applicant."*<sup>8</sup>

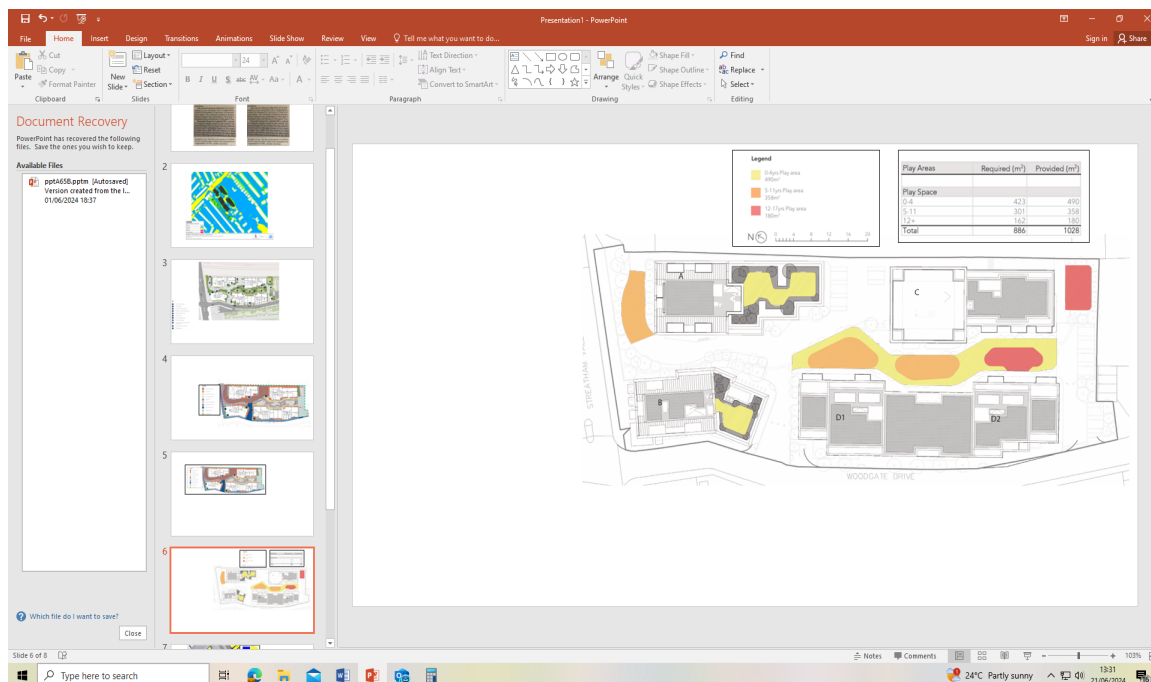
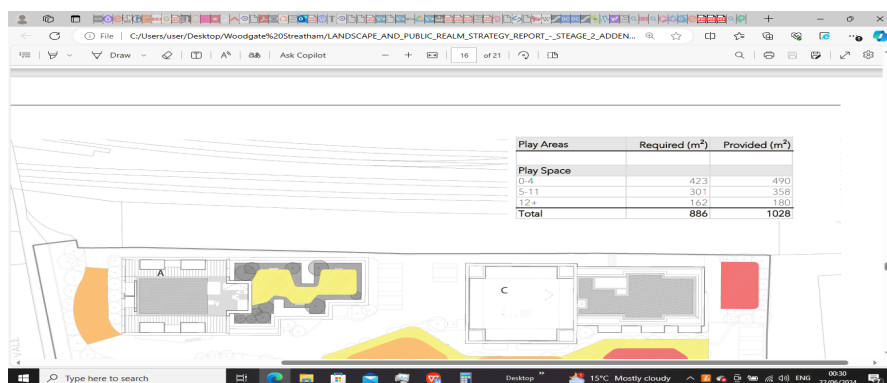
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<sup>7</sup> Sainsbury's Whitechapel APP/E5900/W/17/3190685; 8 Albert Embankment APP/N5660/V/20/3254203 & APP/N5660/V/20/3257106

<sup>8</sup> DRP1, 11.4



The 237 homes are expected to accommodate around 77 children of all ages, generating a need for at least 886m2 of playspace in total. The applicant claims that 1,028m2 of children's playspace is provided, but this includes the roof.

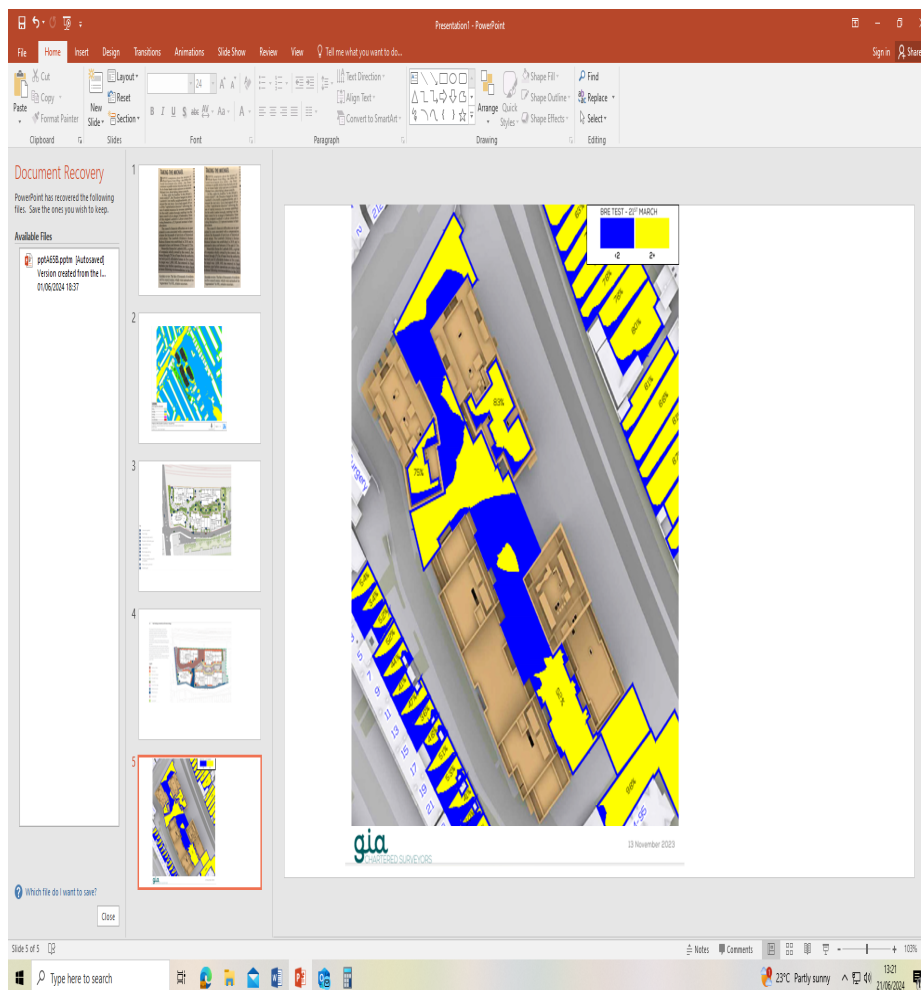


According to the revised GIA Daylight, Sunlight & Overshadowing report<sup>9</sup> nearly half (48%) of the development's main amenity space between the buildings will receive less than 2 hours of sunlight at the equinox. Contrary to guidance the report fails to analyse

<sup>9</sup> Nov 2023, Fig 11 pg 37

the impact in winter, but clearly the communal garden will receive even less or no sunlight at all during the winter. This clearly fails the aspirations of the Housing Design Guidance B9.5:

“Maximise the quality and availability of daylight and sunlight in communal outside spaces, *particularly in winter*. It is particularly important that spaces designed for frequent use (including sitting and play spaces) *receive direct sunlight through the day*, particularly at times they are most likely to be used.”



The issue of overshadowing was criticised strongly by the Design Review Panel at pre-app stage:

*“ concerns about the overall scale, bulk, form and siting of blocks which they consider to negatively impact the quality of public spaces and private communal garden... The Panel have concerns about the separation distances between blocks as well as the proposed height of blocks which they thought would feel quite enclosed and tight at ground level. They thought that the proposed block height and siting would also lead to the overshadowing of the public realm and private gardens.”*<sup>10</sup>

But this problem of overshadowing has only worsened as the design has evolved upwards, with the earlier Design & Access of Dec 2021 showing only 33% of the amenity space having less than 2 hours sunlight<sup>11</sup> but this has now ended up as 48% of the communal garden being in almost permanent shadow.

## Environmental Impact: Microclimate

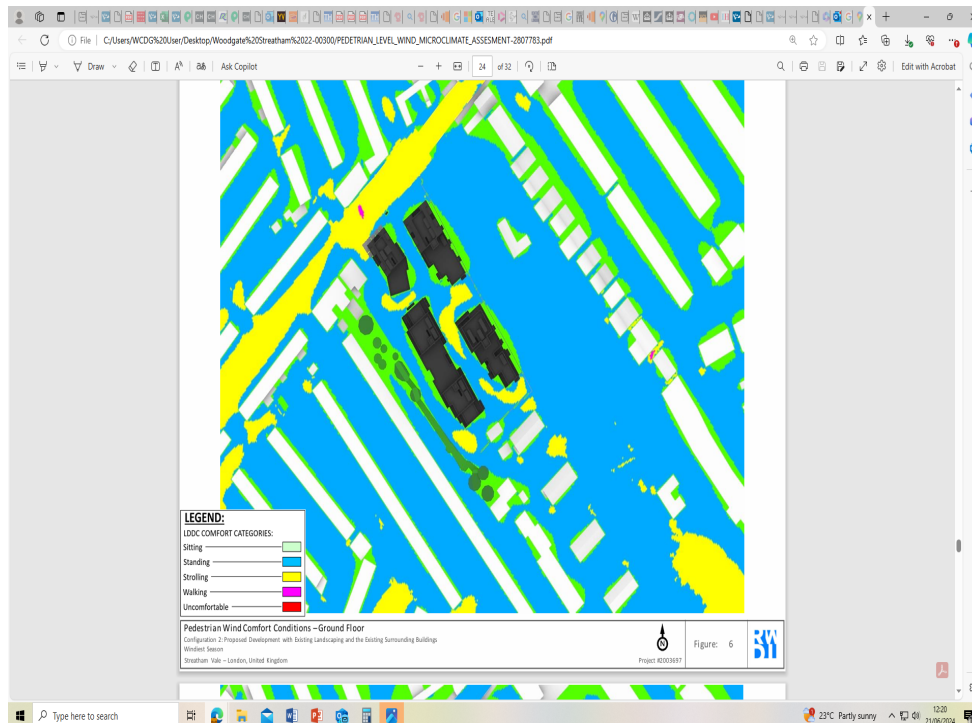
The Design and Access Statement states that the communal amenity space “provides for a range of residents needs including children’s play and amenity space for all ages.

<sup>10</sup> Design Review Panel 1, April 2021, 10.1-2

<sup>11</sup> 3.14 Residential amenity

Green soft landscaped areas are maximised ... and add visual delight for residents and the public.”<sup>12</sup>

The Microclimate report evidences that major parts of the communal garden community space will not be able to fulfil this function because it will not have the microclimate to sit or stand, but would only be tolerable walking, thus rendering the provision and siting of benches obsolete, for example. The microclimate some distance beyond the development is also significantly impacted.



### Design: dual aspect

LLP Policy H5 explains that new residential development will be expected to provide dual-aspect accommodation, unless exceptional circumstances are demonstrated.

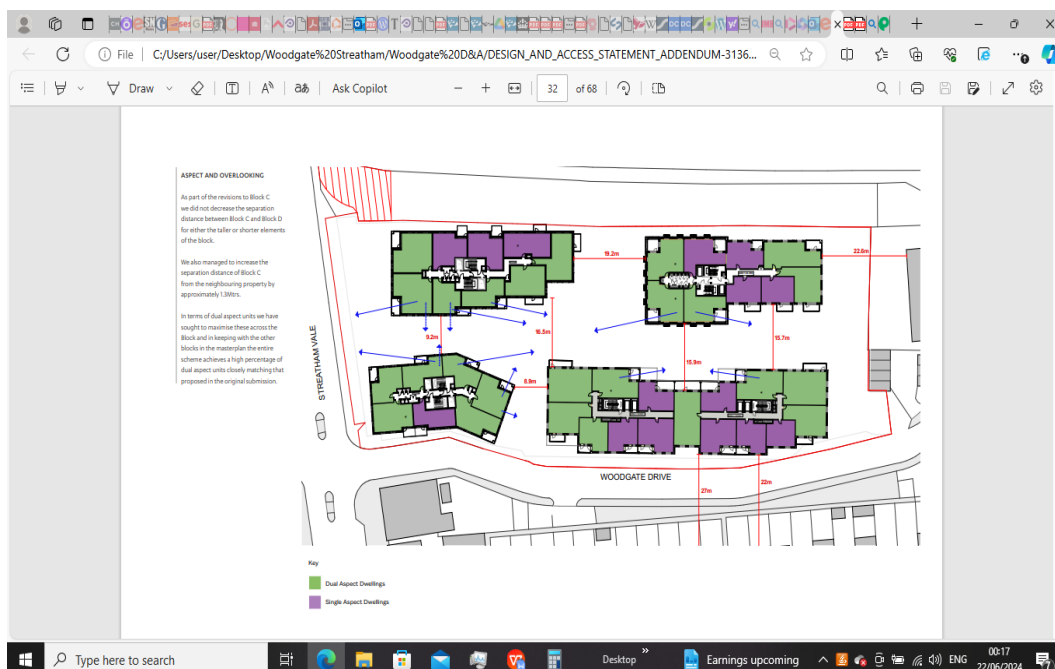
The Mayor's Housing Design LPG C4.1 states

*“New homes should be dual aspect unless exceptional circumstances make this impractical or undesirable; for example, when one side of the dwelling would be subjected to excessive noise or outside air pollution. Where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces; should not face north; and must demonstrate that the units will: have adequate passive ventilation, daylight and privacy; and not overheat”.*

108 flats (46%) would be single aspect. 32 of these would be low cost rent, and 18 intermediate. A large number of these would have their single aspect looking directly over the railway line, with its associated noise and pollution - 5 flats on each floor of blocks and A and C.

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<sup>12</sup> D&AS 3.6



### From DAS Addendum (Nov 2023), 3.5

What are the exceptional circumstances which policy requires in justification? Guidance gives an example “where one side of a dwelling would be subjected to excessive noise or outside air pollution”. One side of the site looks directly over the railway line, with its excessive noise and pollution - but this is also the side with a large number of single aspect flats overlooking that very railway line! 5 flats on each floor of the two blocks A and C. This is exceptionally inappropriate for single aspect homes.

In fact the applicant provides no explanation anywhere in the DAS or Planning Statement of the exceptional circumstances preventing the provision of dual aspect residences. The need to maximise the number of dual aspect flats was raised by the local authority at pre-app<sup>13</sup> and by the GLA at Stage 1, (when the single aspect was much lower at 26% of flats) which stated

*“the developer should explore design solutions to further increase dual aspect units where possible, particularly along the railway tracks”<sup>14</sup>*

Not only has this not happened, but the number of single aspect homes has almost doubled with the subsequent revisions. In a desperate effort to approve the scheme, the local authority made the extraordinary claim that

*“46 per cent of all the homes would be single aspect... The reasons for this are primarily due to the rectangular form of the Site which has informed the rectangular form of all blocks”<sup>15</sup>*

## Conclusion

The application is a departure with regard to the requirement for a plan-led approach to the location of tall buildings. It is clear from a cursory look at various aspects of the application that it fails to meet criteria set out in the London Plan and Local Plan

- It will adversely impact on strategic or local views;
- It will adversely impact visually both at distance and close up
- design excellence is not achieved (form, proportion, silhouette, detailing and materials etc.);
- It would not make a positive contribution to public realm and townscape including at street level

<sup>13</sup> Planning Statement (Revised) 3.3.3

<sup>14</sup> Stage 1 report, 55

<sup>15</sup> LBL Planning Report 19/03/24 - 4.2.275

- It is not acceptable in terms of environmental and functional impacts including microclimate, daylight and sunlight
- It does not meet the standards required in terms of child's play space or dual aspect amenity

**Ultimately the application fails to show that the site can accommodate the uses and quantum of development proposed.**

While the need for more affordable housing is acute, and this site needs to be optimised in terms of housing, what is proposed what cause considerable damage in the ways set out in this letter.

My experience as a member of Lambeth's Planning Applications Committee is that the local planning authority has not followed policy requirements regarding this application stretching right back to the in-principle support in the early pre-app period, and has deliberately avoided processing, consulting and assessing this as a departure application.

For these reasons I am herein requesting that the Mayor call in this application for his determination.

Yours sincerely



Scott Ainslie

Leader, Lambeth Green Group of Councillors



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