

# GREATER LONDON AUTHORITY

**(By email)**

Our reference: MGLA280422-9793

Date: 10 May 2022

Dear [REDACTED]

Thank you for your request for information which the Greater London Authority (GLA) received on 27 April 2022. Your request has been considered under the Freedom of Information Act 2000.

You requested:

*I understand the GLA does have its Stage 1 Report as the GLA wrote it.*

*The document is summarised in the applicant's Design and Access Statement. The way this has been written raises questions about what the report said and I would be grateful if you would release a copy for review.*

*Many local planning authorities do now release pre application reports where in the public interest and I believe this is such a case.*

Please find attached a copy of the pre-app report. The stage 1 report is now available at:  
[Planning Application: 2022/0224 \(london.gov.uk\)](#)

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA280422-9793.

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>

# GREATER **LONDON** AUTHORITY

## Good Growth

**Our ref:** 2021/0979/P2F/TF

**Date:** 23 November 2021

By email

Dear [REDACTED]

**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008**

**Site: Streatham Vale, 100 Woodgate Drive, Streatham, London SW16 5YP**

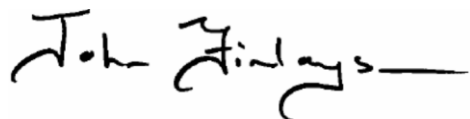
**LPA: London Borough of Lambeth**

**Our reference: 2021/0979/P2F/TF**

Further to the follow-up pre-planning application meeting held on 19 October 2021, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



**John Finlayson**

Head of Development Management

cc [REDACTED], Deputy Head of Development Management  
[REDACTED], TfL

pre-application report 2021/0979/P2F/TF

23 November 2021

# Streatham Vale, 100 Woodgate Drive, Streatham

Local Planning Authority: Lambeth

## The proposal

Demolition of existing buildings to facilitate the mixed-use redevelopment of the site, comprising 258 homes accommodated within four separate buildings ranging in height from 5 to 14 storeys, and approximately 780 sq.m. of Use Class E floor space with active frontage onto Streatham Vale and Woodgate Drive.

## The applicant

The applicant is **Hadley Property Group and Clarion Housing Group** and the architect is **Mae Architects**.

## Assessment summary

GLA officers welcome the opportunity to engage with the applicant on the emerging proposals for this site. The proposed land uses are supported, subject to the resolution of issues regarding the public realm, the proposed commercial uses and the building heights. Comments relating to housing, affordable housing, inclusive design, transport, and climate change must also be addressed in any planning application.

## Key next steps

The future application will need to address the issues raised in this report and the initial pre-application advice note with respect to housing, affordable housing, commercial uses, urban design, heritage, inclusive access, transport and climate change.

## Context

1 On 19 October 2021, a follow-up virtual pre-planning application meeting was held with the following attendees:

GLA group:	[REDACTED]	Principal Strategic Planner, Planning
	[REDACTED]	Team Leader, Planning
	[REDACTED]	Urban Design
	[REDACTED]	TfL Spatial Planning

London Borough of Lambeth:

[REDACTED]	Area Team Manager
[REDACTED]	Case officer

Applicant:

[REDACTED]	Hadley Property Group
[REDACTED]	Hadley Property Group
[REDACTED]	Hadley Property Group
[REDACTED]se	Hadley Property Group
[REDACTED]	Hadley Property Group
[REDACTED]	Hadley Property Group
[REDACTED]	Hadley Property Group
[REDACTED]	Clarion Housing Group
[REDACTED]	Rolfe Judd
[REDACTED]	Rolfe Judd
[REDACTED]	Mae Architects
[REDACTED]	Mae Architects
[REDACTED]	Steer

2 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

## Site description

3 The site measures 0.79 hectares and is located adjacent to Streatham Vale local centre and is bounded by Streatham Vale to the north, Woodgate Drive to the west, a railway line to the east and existing housing to the south. It is approximately 90 metres from Streatham Common Station.

4 The area along the railway line is designated a Site of Importance for Nature Conservation (SINC). The site is not located within a conservation area, however there are Grade II and Grade II\* listed buildings located within 400-900 metres of the site. Streatham Common is located approximately 600 metres to the northeast of the site and is designated Metropolitan Open Land.

5 The site is not allocated in the local plan and is currently occupied by a large retail store and ancillary car park and is currently leased up to 2023.

6 The A23 Streatham High Road is located less than 700 metres from the site and forms part of the Transport for London Road Network (TLRN). The public

transport accessibility level (PTAL) of the site is 3. There are 2 bus services within 250 metres of the site. Streatham Common Station provides rail services to London Victoria and London Bridge.

## Update on the proposal

7 At the initial pre-application meeting, it was proposed that the scheme would provide 277 residential units within four buildings ranging in heights of between 6 and 13 storeys together with 600 sq.m. of commercial floorspace. The latest proposal would involve a comprehensive redevelopment of the site including demolition of the existing buildings and the erection of four buildings ranging in heights of 5 to 14 storeys to accommodate 258 residential units, 362 sq.m. of commercial floorspace and approximately 450 sq.m. of Use Class E floorspace to be secured for community use. The development would also provide disabled persons parking, cycling parking and landscaping works.

## Strategic planning issues and relevant policies and guidance

8 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Lambeth Local Plan 2020-2035 (2021) and the London Plan (2021).

9 The following are also relevant material considerations:

- National Planning Policy Framework and National Planning Policy Guidance (July 2021);
- National Design Guide (2021).

10 The relevant issues and corresponding policies are as follows:

- |                           |   |
|---------------------------|---|
| • Housing                 | <i>London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;</i>   |
| • Urban design / heritage | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG; Public London Charter LPG; Fire Safety D12(A) pre-consultation draft LPG; Fire Safety D12(B) pre-consultation draft LPG; Evacuation Lifts pre-consultation draft LPG;</i> |
| • Economy                 | <i>London Plan;</i>   |
| • Social Infrastructure   | <i>London Plan; Social Infrastructure SPG</i>   |
| • Inclusive design        | <i>London Plan; Accessible London: achieving an inclusive environment SPG; Planning for Equality and Diversity in London SPG;</i>   |

- Climate change *London Plan; London Environment Strategy; 'Be Seen' Energy Monitoring Guidance LPG; The control of dust and emissions in construction SPG; Circular Economy Statements draft LPG; Whole Life-Cycle Carbon Assessments draft LPG; Urban greening factor pre-consultation draft LPG;*
- Transport and parking *London Plan; Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG.*

## Summary of meeting discussion

11 Following a presentation of the applicant's proposals for the site, meeting discussions covered strategic issues with respect to housing, commercial uses, heritage, urban design, inclusive design, climate change, and transport. Advice with respect to all main strategic issues is therefore provided under the associated sections below. This report should be read in conjunction with and as an update on, the previous pre-application advice issued on 18 May 2021.

12 It is understood that an application will be referred to the Mayor of London under Categories 1A 1 and 1C 1(c) of the Schedule to the 2008 Order:

- 1A 1 *"Development which comprises or includes the provision of more than 150 houses, flats or houses and flats"*
- 1C 1(c) *"Development which comprises or includes the erection of a building that is more than 30 metres high and is outside the City of London."*

## Land use principle

13 The redevelopment of a brownfield site to provide housing, including affordable housing, as well as commercial and community floorspace is supported in principle. As set out in the previous pre-application advice note, given its out-of-centre location, the loss of the existing retail floorspace is acceptable. Since the initial pre-application meeting, the applicant has continued to liaise with the adjoining landowner to the north to enable a comprehensive redevelopment of the site. However, it is understood that this is unlikely to come forward for inclusion in the redevelopment of this site.

14 The proposed development would provide 362 sq.m. of commercial floorspace with the potential to accommodate retail uses fronting Streatham Vale and Woodgate Road. This has been reduced by approximately 240 sq.m. from that which was considered at the initial pre-application meeting. The proposals would also provide approximately 450 sq.m. of Class E floorspace to provide a community cycle hub which would also include a cafe. These revisions do not raise any strategic concerns from a land use perspective.

## Housing

### Affordable housing

15 London Plan Policies H4 and H5 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. The Mayor's Affordable

Housing and Viability Supplementary Planning Guidance (SPG) seeks to increase the provision of affordable housing in London and embed affordable housing into land prices.

16 The proposals would continue to provide 35% affordable housing by habitable room, comprising 70% at London Affordable Rent levels and 30% shared ownership. Details relating to the affordability of the affordable housing products must be provided. As per previous advice, should the development meet planning requirements and obligations to the satisfaction of the local planning authority and achieve an acceptable tenure split then the development would be eligible for the Fast Track Route.

### Housing choice

17 London Plan Policy H10 encourages a full range of housing choice and identifies sites closer to town centres, stations or locations with higher public transport access and connectivity may be more appropriate for a higher proportion of one and two-bed units.

18 The proposals would provide 82 one-bed, 142 two-bed and 34 three-bed units. This mix remains supported in strategic planning terms, subject to the Council's views.

### Playspace

19 In accordance with Policy S4 of the London Plan and the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance, development proposals should include suitable provision for play and recreation and incorporate good-quality, accessible play provision for all ages of at least 10 sq.m. per child.

20 The scheme currently provides playspace for children aged 0-17 years onsite of 1,119 sq.m. which is welcomed. Policy S4 of the London Plan makes clear that play space in new residential developments should not be segregated by tenure and that all residents should be able to access all areas of playspace, which should be demonstrated as part of any planning application.

## **Commercial uses**

21 The proposals would provide 362 sq.m. of commercial floorspace on the ground floor of Block B. The applicant has indicated it is likely this space would be occupied by a convenience retailer to serve the site and surrounding area. In addition, the proposals include a community cycle hub and cafe on the ground and part first floor of Block A. The cycle hub (Use Class E) would be dedicated for community use, run as a charity, and should be secured as such by way of a legal agreement. Any planning application should set out how this space would be managed.

## Urban design

22 Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

23 London Plan Policy D3 also seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services.

### Tall buildings

24 Policy D9 of the London Plan states that tall buildings should be part of a plan-led and design-led approach, incorporating the highest standard of architecture and materials and should contribute to improving the legibility and permeability of an area, with active ground floor uses provided to ensure such buildings form an appropriate relationship with the surrounding public realm. Tall buildings should not have an unacceptably harmful impact on their surroundings in terms of their visual, functional, environmental and cumulative impacts, including wind, overshadowing, glare, strategic and local views and heritage assets. Policy D9 also states that tall buildings should only be developed in locations that are identified as suitable in development plans. Policy D9 further states that Boroughs should define what is considered a tall building for specific locations. The London Plan states that the definition of a tall building should not be less than 6-storeys or 18 metres, as measured from the ground to the floor level of the uppermost storey.

25 Since the initial pre-application meeting, the Lambeth Local Plan 2020-2035 (2021) has been adopted. Policy Q26 of the local plan defines tall buildings in South Lambeth (south of the Couth Circular Road) as buildings above 25 metres. Part B of Policy Q26 sets out that outside of the locations identified as appropriate for tall buildings (Waterloo, Vauxhall and Brixton), a clear and convincing justification should be provided to 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. In addition, the (local) policy states that proposals for tall buildings will only be considered acceptable in established low rise residential neighbourhoods where they are part of a comprehensive scheme which integrated with the locality.

26 The proposed development ranges in height from 5 to 14 storeys and would therefore meet the definition of a tall building set out in the Lambeth Local Plan 2020-2035 (2021). As the site is not within an area identified by Lambeth as suitable for a tall building and therefore does not accord with the plan-led principle set out in Policy D9 of the London Plan; as well as addressing local criteria, any application should demonstrate how it would comply with the remaining provisions of London Plan Policy D9 with regards to the visual, functional, environmental and cumulative impacts as set out below.



### *Visual impacts*

27 The proposed development would range in height from 5 to 14 storeys, with the lower heights proposed along Woodgate Drive, and the taller elements located more centrally in the site adjacent to the railway line. This would go some way in responding to the existing local character when experiencing the building at street level along Woodgate Drive. The proposed development is of a scale and of proportions that would significantly increase the building heights in the area.

28 The applicant has provided a number of views of the proposed development. The proposals can be clearly seen in the majority of the views that have been provided though often at a distance and therefore with lesser impact than if these views were within closer proximity to the site. Views 7 and 8 are from Streatham Common located to the north east of the site and is designated Metropolitan Open Land (MOL). The proposed development is perceptible from the views that have been provided but would not have a detrimental impact on the designated MOL given its distance from the site. Additional wireline views from Streatham Common should be provided to enable a full assessment which clearly show the proposals in both summer and winter views. The location of the views should be agreed with the Council.

29 The proposals would also be clearly visible in View 9 which is located within a conservation area with the proposed buildings perforating the existing roofscape. This has the potential to cause harm to the setting, and thereby the significance, of the conservation area, though this is considered to be at the lower end of less than substantial harm. Any harm will be weighed against the public benefits of the scheme on consideration of any future planning application.

30 The proposed development is most visible in View 3 where it terminates the view looking south east on Eardley Road; its increased height changing the character of the area. The scheme is also clearly visible from View 4; however, it is unlikely to cause harm to the significance of the locally listed railway station building from this view given the location of the railway line which fronts Eardley Road immediately adjacent to this viewpoint. In order to enable a robust assessment of the development's impacts on heritage assets, the applicant should provide a view from Estreham Road with the railway station building in the foreground and the proposed development in the backdrop to the view.

31 The applicant should ensure that the architectural quality and materials are of an exemplary standard to ensure the appearance and architectural integrity of the building is maintained throughout its lifespan.

32 Tall buildings should reinforce the spatial hierarchy of the local and wider context, aid legibility and wayfinding. In addition, buildings should avoid harm to heritage assets, should not cause adverse reflected glare and should be designed to minimise light pollution from internal and external lighting.

### *Other impacts*

33 The applicant should refer to the previous comments relating to the functional, environmental and cumulative impacts of the proposed development. However, it is

noted that under the current proposals Block D would be pulled back to increase separation distances, creating a more successful public realm. Notwithstanding that, the applicant should give some further consideration to the servicing of the site as set out in paragraph 36 below.

### Layout

34 The location of predominantly 6 storey blocks along Woodgate Drive, and taller elements with articulated roofs along the main road, is supported. The consolidation of the commercial space to the west of the site is also supported.

35 The applicant presented improvements to the overall massing and has sought to address issues previously raised on tight separation distances by pulling back the massing of Block D. While these changes and the broad range of proposed buildings are welcomed, the proposed massing is subject to daylight/sunlight testing to ensure the development creates favourable conditions particularly in the landscaped central area where proposed play spaces are located.

36 The level of servicing required to support the number of units proposed in the scheme has resulted in increased spatial pressures at ground level. The applicant should further consider the servicing of the development as it currently requires servicing vehicles to reverse in the main entrance of the site, which raises safety concerns.

37 The applicant has sought to address issues related to high levels of inactive servicing frontages by introducing a centralised cycle hub. Whilst the concept of the cycle hub is supported and has potential to create a high quality shared communal facility, a number of concerns were raised in relation to ease of access, accessibility and perception of security. Consideration should be given to the potential take up rate of the cycle parking particularly at upper levels, operational requirements during peak hours, and the potential to include an additional lift in the event of a breakdown/maintenance. The applicant should consider whether a more direct sightline from the concierge/security desk to the entrance of cycle hub can be achieved, especially for residents using the facility at night. The applicant should provide a detailed management plan as part of any future planning application, which should be appropriately secured.

38 Some cycle parking should be provided within all residential blocks to cater for larger cycles and adapted cycles for disabled people. These should be in locations that are well-located and secure.

### **Heritage**

39 As set out in the initial pre-application advice note, the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. The note also refers to the NPPF which attaches great weight to designated heritage assets, with greater weight given to more important heritage assets. Where the development would lead to 'less than substantial harm', the harm will be weighed against the public benefits of the scheme. Policy HC1 of the London Plan states that development should conserve

heritage assets and avoid harm. This is also applicable to non-designated heritage assets. Any future application should address the potential heritage impacts of the scheme including those set out in paragraphs 27-30 above.

## **Inclusive design**

40 Policy D5 of the London Plan seeks to ensure that proposals achieve the highest standards of accessible and inclusive design. Any application should ensure that the development can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and is designed to incorporate safe and dignified emergency evacuation for all building users. This should be set out within an inclusive design statement in the Design and Access Statement which should also meet the requirements of paragraph 3.5.3 of Policy D5.

## **Transport**

41 Full comments were provided in response to the initial pre-application. The following comments relate only to the transport changes since that meeting.

### Car parking

42 As discussed at the first pre-application meeting, it is supported that Blue Badge (BB) parking will be provided for 3% of the residential units from the outset. It is noted that an additional 7% are still proposed to be safeguarded within the public realm, and that 2 BB car club spaces are proposed to accommodate additional demand. It was agreed that the applicant should consider providing the additional BB spaces elsewhere if required to prevent the loss of public realm. In addition, although noted that the Car Club spaces might be able to address rising demands, this should be closely monitored through a Car Parking Design and Management Plan

43 Electric vehicle charging infrastructure should be provided at least in accordance with London Plan standards.

### Cycle parking

44 Following on from the first pre-application meeting, cycle parking has been amended in order to meet both London Plan and Lambeth Local Plan standards. The majority of cycle parking spaces are proposed to be provided within a cycle hub at Block A whilst a few would be provided in Block D2 as it is the furthest block away.

45 The layout should be revised further to provide a small amount of cycle parking spaces within each residential block as some residents might not feel encouraged to cycle if storage is provided outside of their residential core due to safety and inconvenience. In addition, the proposal raises concerns of accessibility for those using larger and adapted cycles, and those who have difficulty walking.

## Plans

46 A Delivery and Servicing Plan should be provided, [guidance](#) for which is available on the TfL website. A Construction and Logistics Plan should be provided in line with Policy T7 of the London Plan, approved by Lambeth Council and TfL and secured by condition. A Travel Plan is required and should incorporate the expected shift from car travel to active travel as set out in the Mayor's Transport Strategy and the London Plan.

## **Climate change**

47 Full comments were provided in response to the initial pre-application. The following comments relate only to the changes since that meeting.

## Energy

48 The applicant proposes to meet the 12% energy efficiency target for residential uses (increased from 10% which was proposed at the initial pre-application meeting) which is welcomed. In addition, the applicant should ensure the non-residential element of the scheme achieves the 15% energy efficiency target set out in London Plan Policy SI2.

## Circular economy

49 As set out in the initial pre-application advice note, a Circular Economy Statement is required to be submitted in accordance with Policy SI7 of the London Plan. The applicant should refer to the guidance on how to prepare Circular Economy Statements and a [‘Design for a circular economy’ Primer](#) which helps to explain the principles and benefits of circular economy projects.

## Air quality

50 The applicant should ensure that an air quality assessment is submitted with the application to ensure that there are no adverse impacts on local air quality, and that future residents/occupiers are not exposed to poor air quality. This is especially important for residential units adjacent to Streatham Vale.

51 Furthermore, the development must be 'air quality neutral', meeting both the building and transport emissions benchmarks calculated for the size and scale of the development. The energy strategy should prioritise zero emission technology. Any combustion plant, including diesel generators, must be assessed in the air quality assessment if this is to be proposed. The car-free nature of the development is welcomed, and the proposed cycle hub provides an innovative approach to cycle parking. It is strongly supported to incentivise alternatives to private vehicle use by providing a sustainable and convenient alternative.

52 Conditions will be recommended to ensure impacts relating to construction dust and PM10 are minimised, and to ensure compliance with the NRMM Low Emission Zone standards for construction plant.

## Green infrastructure

53 The proposed development presents a well-considered approach to integrating green infrastructure across the site, including the incorporation of rain gardens and biosolar roofing. These elements support multifunctionality and are in accordance with Policy G1 of the London Plan. The integration of green infrastructure and urban greening should be a key consideration as the design develops. The use of well-established case study examples as inspiration is supported.

54 In accordance with Policy G4, the applicant should aim to maximise access to public open space, particularly green space where possible. The site is located within an area identified to be deficient in access to public open space in the London Green Infrastructure Focus Map and so this is particularly important.

55 The applicant provides an updated Urban Greening Factor (UGF) score of 0.4 which meets the target set out in Policy G5 of the London Plan. This is supported and should be brought to fruition. The applicant should provide details of the UGF calculation prior to Stage 1.

56 The applicant does not appear to set out how impacts will be avoided or minimised to the adjacent SINC. This should be detailed at Stage 1 in accordance with Policy G6 of the London Plan.

57 The applicant should aim to secure biodiversity net gain and provide quantitative evidence at Stage 1, in accordance with Policy G6(D) on the London Plan. If biodiversity net gain is not achievable on the site, then the applicant should review opportunities for biodiversity offsetting in consultation with the Borough.

58 Details of existing trees across the site as well as proposed tree retention and removal should be provided at Stage 1, in accordance with Policy G7 of the London Plan. Wherever possible, trees of value should be retained. The applicant should consider a diverse range of tree species and large-canopied trees to target urban heat island (UHI) effects as the site is identified within the London Green Infrastructure Focus Map as within an area of medium to high risk areas for UHI.

## **Conclusion**

59 GLA officers welcome the opportunity to engage with the applicant on the emerging proposals for this site. The principle of the proposal is supported, subject to the resolution of issues regarding the public realm, the proposed commercial uses, the heights of the buildings proposed and any impacts on Metropolitan Open Land. Comments relating to housing, heritage, inclusive design, transport, and climate change must also be addressed in any planning application.

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for further information, contact GLA Planning Unit (Development Management Team):

**Lucinda Turner, Assistant Director – Planning**

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**John Finlayson, Head of Development Management**

email: [REDACTED]

**[REDACTED], Deputy Head of Development Management**

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**[REDACTED], Team Leader – Development Management**

email: [REDACTED]

**[REDACTED], Principal Strategic Planner (case officer)**

email: [REDACTED]

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We are committed to being anti-racist, planning for a diverse and inclusive London  
and engaging all communities in shaping their city.