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26th March 2021

Lambeth Council
Planning Policy
PO Box 734
Winchester
SO23 5DG

Dear Madam/ Sir

I am responding to the consultation on the proposed Main Modifications (MM) to the Draft Revised Lambeth Local Plan (DRLLP). My comments relate to MM reference PC224 in respect of policy Q26, Tall Buildings.

I note that the proposed modifications indicate that north of the South Circular road that tall buildings will be defined as being above 45m in height. Assuming an average floor to ceiling height of 2.5m to 3m this would be around 18 storeys in height.

I consider this proposed MM to be inappropriate. The tall building DRLLP policy Q26 as currently drafted gives significant protection to areas of Lambeth outside those specifically identified as being suitable for tall buildings.

However, if 'tall' is to be defined being above 45m, that would expose significant parts of Lambeth to buildings of up to around 18 storeys without these being 'tall' and thus without the protection that DRLLP policy Q26 gives. In my view once a building is over say, 8 to 10 storeys, the adverse effects for those living immediately around it, especially in standard 2 storey homes are basically the same as a significantly higher tower.

Drawing on the recent planning appeal decision for the Woodlands site in Kennington (Appeal Ref: APP/N5660/W/20/3248960 on Woodlands Nursing Home, 1 Dugard Way, London) in the north of the borough of Lambeth illustrates this. Whilst the area is within inner London, the Inspector found that the area was defined as 'urban' rather than 'central' for planning purposes as it was "predominantly dense development as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys" (para 25 of the Inspector's report (attached)).

In considering relevant policy, it was of note to the Inspector that neighbouring London Borough of Southwark in its Elephant & Castle Opportunity Area SPD had identified the adjoining areas to Woodlands site within Southwark thus "...the existing character of parts of the west, south and east of the wider opportunity area comprises low scale residential development..." and that "These areas cannot accommodate significantly taller development" (para 27). As the DRLLP stands at present this kind of specific protection would not be available to most of Lambeth.

Additionally in the case of the Woodlands appeal, the proposed 29 storey tower would have been only about 20m behind a Grade II listed Water Tower (itself approximately 8 storeys in height) which has been converted to residential use. In the view of the Inspector "Given its 29 storey height and proximity, [the proposed development] would dominate the Water Tower and would substantially

reduce its imposing character. It would, also importantly and in this view, result in the Water Tower no longer having a silhouette against the sky. The proposed development would harm the setting of the Water Tower” (para 36).

However if a development of around 18 storeys in height (i.e. below the proposed MM threshold of tall) were to be proposed it would have basically the same effect as the 29 storey tower on the approximately 8 storey Water Tower, but would not be subject to the protections of DRLLP policy Q26.

Therefore I consider that a blanket policy in the DRLLP setting the minimum height of 45m for tall buildings north of the South Circular, without further protection will expose residents of the borough from damaging development of just under the 45m threshold.

I therefore propose that a thorough assessment of the borough of Lambeth to identify what London Plan 2021 Policy D9 A states as “what is considered a tall building for specific localities” (my underlining) should be undertaken.

I trust that my views will be considered.

Yours faithfully

Jon Barker