

**Site Allocations Development Plan
Document: Proposed Submission Version
(Regulation 19)**

**Regulation 18 Consultation
Report**

February 2024


Lambeth

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1. INTRODUCTION

Purpose of the report

- 1.1. Lambeth Council is currently in the process of preparing a Site Allocations Development Plan Document (SADPD). Following on from the adoption of the Lambeth Local Plan in September 2021, the SADPD includes site-specific planning policies for thirteen sites in Lambeth, distributed across the borough. Once adopted, the SADPD will become part of the statutory development plan for Lambeth. Alongside the Lambeth Local Plan 2021, the London Plan 2021 and the South Bank and Waterloo Neighbourhood Plan 2019 and associated planning guidance, the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth.
- 1.2. This report is an account of the public consultation on the Draft SADPD under Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012, hereafter known as Regulation 18. The consultation was held between 11 January and 22 February 2022. The consultation documents comprised the Regulation 18 draft SADPD, accompanying Sustainability Appraisal, Habitat Regulations Assessment (HRA) and related evidence for each site. Comments were invited on the content of all these documents.
- 1.3. This report explains how the consultation was undertaken, identifies those consulted, summarises the issues raised and sets out how the Council has responded to those issues to prepare the SADPD Proposed Submission Version (PSV). A full schedule of all the written responses received, and the Council's consideration of these responses, is included in Appendices J and K.

Background

- 1.4. There is a legal process for the preparation of a development plan document (DPD), such as the SADPD. The Local Planning Authority (LPA) preparing the plan is required to undertake consultation at two stages, the first of which is known as Regulation 18. This requires the LPA to notify stakeholders it is preparing a DPD and invite each of them to make representations to the LPA about what a SADPD ought to contain. The approach to Regulation 18 consultation is not legally prescribed but must take place in accordance with the LPA's agreed Statement of Community Involvement.

- 1.5. Following Regulation 18 consultation, the LPA must publish the version of the DPD it intends to submit to the Secretary of State for Examination. This is known as Regulation 19 pre-submission publication. This stage provides consultees an opportunity to submit comments on whether the SADPD meets the statutory tests of soundness for DPDs and is legally compliant. The comments submitted at this stage are passed to the appointed independent Planning Inspector who will be undertaking the Examination.
- 1.6. The LPA is also required to undertake a Sustainability Appraisal (SustA) for the DPD. This considers the ways in which the DPD can contribute to improvements in environmental, social and economic conditions and is a way of identifying and mitigating any potential adverse impacts. It also makes sure that the proposals in the DPD are the most appropriate, given the reasonable alternatives. The SustA takes place in stages as the DPD goes through the process of preparation. At each stage, there is an opportunity to comment on the SustA.

2. SUMMARY OF PROCESS

- 2.1. The Regulation 18 consultation was carried out in accordance with a Consultation and Engagement Plan which was agreed by the Council on 13 December 2021. The Regulation 18 Consultation and Engagement Plan can be found in Appendix A.
- 2.2. The Council is required by law under the Planning and Compulsory Purchase Act 2004 to have a Statement of Community Involvement (SCI), which sets out how and when the community and other stakeholders can be involved in the planning process. This includes involvement in the plan-making process. This is consistent with the Lambeth Statement of Community Involvement 2020.

Stakeholder mapping

- 2.3. Stakeholder mapping is the process by which the characteristics and attributes of the different stakeholders linked to a project is identified and analysed. It was critical the mapping was undertaken at the outset of the project as it enabled the Council to consider how to broaden participation from all members of the community in Lambeth. The key stakeholders that were identified for the consultation were:

- Those who live, work and carry out business in Lambeth
- Tenants and leaseholders

- Residents' associations
- Community and voluntary groups
- Elected politicians
- Neighbourhood planning groups (existing and emerging)
- Business Improvement Districts (BIDs) and business networks
- Developers and landowners (and their representatives)
- Registered providers of affordable housing
- Infrastructure providers (such as transport, health service)
- Statutory consultees such as the Mayor of London, other London boroughs, Historic England, Environment Agency, and Natural England

2.4. To inform and assess the potential equalities impacts of the consultation approach, these key stakeholder groups for the consultation were assessed against three levels of engagement; 'active'; 'aware and potentially active'; and 'groups with whom the council has struggled to engage' in the past. The assessment is set out in Table 1 below. To ensure participation from a wide range of stakeholders, this mapping exercise helped to identify the consultation and publicity methods.

Table 1. Stakeholder mapping

Audience characteristic	Audience attributes	Stakeholder	Consultation/publicity method
Active	<ul style="list-style-type: none"> • Likely to be identified consultees (general, specific or other) • Established interest in planning and regeneration issues • Likely to be members of community organisations • Have a sense of belonging to their neighbourhood • Follow and/or are aware of various council initiatives 	<ul style="list-style-type: none"> • Politicians • Neighbourhood planning groups • Interest groups e.g. Lambeth 500 • Developers and landowners • Registered providers of affordable housing • Infrastructure and service providers • Statutory consultees 	<ul style="list-style-type: none"> • Notification by email and through bulletins/networks • Briefing for ward councillors • Meetings with neighbourhood planning groups and BIDs • Presentation to Lambeth Housing Partnership • Meetings with statutory consultees and service providers (where appropriate).
Aware and potentially active	<ul style="list-style-type: none"> • Likely to read newsletters, council website, tweets etc 	<ul style="list-style-type: none"> • Tenants' and Residents' Associations 	<ul style="list-style-type: none"> • Notification by email and through bulletins/networks

Audience characteristic	Audience attributes	Stakeholder	Consultation/publicity method
	<ul style="list-style-type: none"> • Easy to inform but not so easy to involve – maybe don't have the time or we don't provide the right opportunity • Might engage if we are in the right place or offer the right forum • Limited knowledge of planning and regeneration issues • Might rally around a single issue 	<ul style="list-style-type: none"> • Community and voluntary groups • Special interest groups or networks • Businesses and business networks 	<ul style="list-style-type: none"> • Promotion in council publications • Promotion by ward councillors
Groups with whom the council has struggled to engage	<ul style="list-style-type: none"> • Don't read the literature that the council sends • Think that what the council says doesn't directly affect them • Limited knowledge of planning and regeneration issues • May not speak English as a first language • May not feel they have much of a stake in their local community (e.g. young people, just moved into the area) 	<ul style="list-style-type: none"> • Residents not involved in groups or networks • Those in more disadvantaged socio-economic groups • Some older people • Some young people • Some disabled people • Some black and minority ethnic groups 	<ul style="list-style-type: none"> • Promotion by ward councillors • Use of social media channels • Publicity through the Youth Council and bulletins targeting young people • Meeting with groups representing people with disabilities and young people • All consultation material to include detail of support available in libraries

2.5. An Equalities Impact Assessment (EqIA) of the consultation and engagement plan was carried out alongside the EqIA of the Draft SADPD. This can be found in Appendix B of the report. The EqIA confirms the SADPD will likely result in generally positive impacts on different protected groups in Lambeth. It also provides details on the consultation process and methods in promoting the consultation.

Primary method

Commonplace

- 2.6. The primary method for seeking stakeholders' views at Regulation 18 consultation was Commonplace, a digital consultation platform used by the Council. It is designed to be easy to access on smartphones and tablets to encourage wider community participation. Screenshots of the website are shown in Appendix C to give an indication of how the material was presented on the Commonplace platform.
- 2.7. The Commonplace site presented an overview of the sites in map form, allowing stakeholders to select the site(s) they are interested in. Details of each site were provided individually, including an aerial photograph and its boundary, the vision for the site and maps showing the context and proposed approach, as well as draft policy wording. Links to relevant sections of the supporting evidence and the SustA were also made available. In addition to site information, the background of the Draft SADPD was also provided.
- 2.8. Material was also provided to confirm what people were being asked to comment on, how the results of the consultation would be considered and reported on, and the next steps in the process for preparing the SADPD.
- 2.9. A series of questions then invited responses on the content of the Draft SADPD and on the proposed approach to each site.
- 2.10. If someone did not wish to respond using Commonplace, it was made clear that representations could be made in writing by email or by post and that all responses received would be considered equally, irrespective of the medium used.

Supplementary methods

- 2.11. The following supplementary methods were used to gather the views and comments of stakeholders:

Engagement with ward councillors

- 2.12. Cabinet voted to approve the Regulation 18 consultation and the approach to consultation on 13 December 2021. Alongside this Cabinet decision, a series of meetings were held to brief ward councillors with allocated sites in or nearby their wards. These meetings were held virtually on 8, 9 and 16 December 2021, in line with

Government guidance on the COVID-19 pandemic. These meetings gave ward councillors a chance to consider the material and also provided them with the information necessary in order to support their residents in accessing the consultation material.

2.13. Ward councillors were also invited to the area-based meetings, discussed in paragraphs 2.16 and 2.17 of this report.

Engagement with local MPs

2.14. Three parliamentary constituencies fall within Lambeth's boundary. The three MPs of these constituencies were offered a briefing session with Council officers regarding the Draft SADPD consultation. They were also invited to the area-based meetings, discussed in paragraphs 2.16 and 2.17 of this report. The MPs who attended a briefing were also asked to disseminate information about the consultation to their constituents.

2.15. The following briefings took place:

- Florence Eshalomi MP (21st January)
- Bell Riberiro-Addy MP (1st February)

Area Meetings

2.16. Meetings were held with representatives from community groups and organisations based in the six neighbourhoods in Lambeth in which the Council proposed a site allocation in the Draft SADPD. Ward councillors and MPs were also invited. A full list of the invitees and attendees is set out in Table 2.

2.17. These meetings were held virtually in line with Government guidance on the COVID-19 pandemic. These meetings gave community representatives the opportunity to consider the consultation material, ask questions and express their views. The representatives were also encouraged to disseminate information about the consultation to the wider community.

Table 2. Area Meetings Invitees and Attendees

Area meeting	Date	Invitees	Attendees
West Norwood	24 January 2022	<ul style="list-style-type: none">• Cllr Jackie Meldrum, Knight's Hill ward	<ul style="list-style-type: none">• Cllr Matthew Bennett, Gipsy Hill ward councillor

		<p>councillor (Labour and Co-operative);</p> <ul style="list-style-type: none"> • Cllr Jane Pickard, Knight's Hill ward councillor (Labour and Co-operative); • Cllr Sonia Winifred, Knight's Hill ward councillor (Labour and Co-operative); • Cllr Fred Cowell, Thurlow Park ward councillor (Labour and Co-operative); • Cllr Anna Birley, Thurlow Park ward councillor (Labour and Co-operative); • Cllr Peter Ely, Thurlow Park ward councillor (Labour and Co-operative); • Cllr Liz Atkins, Streatham Hill ward councillor (Labour and Co-operative); • Cllr Rezina Chowdhury, Streatham Hill ward councillor (Labour and Co-operative); • Cllr Iain Simpson, Streatham Hill ward councillor (Labour and Co-operative); • Cllr Matthew Bennett, Gipsy Hill ward councillor (Labour and Co-operative); • Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Norwood Planning Assembly • Norwood Forum • Station to Station BID • Norwood Action Group 	<p>(Labour and Co-operative);</p> <ul style="list-style-type: none"> • Cllr Jane Pickard, Knight's Hill ward councillor (Labour and Co-operative) • Chair of Norwood Planning Assembly; • Chair of Norwood Forum; • Treasurer of Norwood Forum; • BID Manager for Station to Station; Chair of Norwood Action Group
Kennington	26 January 2022	<ul style="list-style-type: none"> • Cllr David Amos, Prince's ward councillor (Labour and Co-operative); 	<ul style="list-style-type: none"> • Cllr David Amos, Prince's ward councillor (Labour and Co-operative);

		<ul style="list-style-type: none"> • Cllr Jon Davies, Prince's ward councillor (Labour and Co-operative); • Cllr Joanne Simpson, Prince's ward councillor (Labour and Co-operative) • Florence Eshalomi MP, MP for Vauxhall (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Kennington, Oval and Vauxhall Neighbourhood Forum • Stop the Blocks Community Action Group 	<ul style="list-style-type: none"> • Cllr Jon Davies, Prince's ward councillor (Labour and Co-operative); • Cllr Joanne Simpson, Prince's ward councillor (Labour and Co-operative) • Two representatives from Stop the Blocks Community Action Group; • Acting Chair of Kennington, Oval and Vauxhall Neighbourhood Forum
Loughborough Junction	31 January 2022	<ul style="list-style-type: none"> • Cllr Jim Dickson, Herne Hill ward councillor (Labour and Co-operative); • Cllr Pauline George, Herne Hill ward councillor (Labour and Co-operative); • Cllr Rebecca Thackray Herne Hill ward councillor (Green Party); • Cllr Matthew Bennet, Gipsy Hill ward councillor (Labour and Co-operative) • Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Loughborough Junction Action Group • Herne Hill Society • Herne Hill Forum 	<ul style="list-style-type: none"> • Cllr Pauline George, Herne Hill ward councillor (Labour and Co-operative); • Cllr Rebecca Thackray, Herne Hill ward councillor (Green Party) • Chair of Loughborough Junction Action Group; • Representative from Loughborough Junction Action Group; • Chair of Herne Hill Forum; Representative from Metaform Architects; • Chair of Herne Hill Society
Brixton	3 February 2022	<ul style="list-style-type: none"> • Cllr Scarlett O'Hara, Coldharbour ward councillor (Labour and Co-operative); • Cllr Donatus Anyanwu, Coldharbour ward councillor (Labour and Co-operative); • Cllr Emma Nye, Coldharbour ward 	<ul style="list-style-type: none"> • Cllr Scarlett O'Hara, Coldharbour ward councillor (Labour and Co-operative); • Cllr Adrian Garden, Brixton Hill ward councillor (Labour and Co-operative); • Cllr Maria Kay, Brixton Hill ward

		<p>councillor (Labour and Co-operative);</p> <ul style="list-style-type: none"> • Cllr Martin Tiedemann, Brixton Hill ward councillor (Labour and Co-operative); • Cllr Maria Kay, Brixton Hill ward councillor (Labour and Co-operative); • Cllr Adrian Garden, Brixton Hill ward councillor (Labour and Co-operative); • Cllr Irfan Mohammed, Ferndale ward councillor, (Labour and Co-operative); • Cllr Joshua Lindsey, Ferndale ward councillor (Labour and Co-operative); • Cllr Jessica Leigh, Ferndale ward councillor (Labour and Co-operative); • Cllr Matthew Bennett, Gipsy Hill ward councillor (Labour and Co-operative) <ul style="list-style-type: none"> • Florence Eshalomi MP, MP for Vauxhall (Labour and Co-operative); • Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative); • Bell Ribeiro-Addy MP, MP for Streatham (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Brixton Society • Brixton BID • Brixton Neighbourhood Forum 	<p>councillor (Labour and Co-operative)</p> <ul style="list-style-type: none"> • Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative) <p>Representatives from:</p> <ul style="list-style-type: none"> • Brixton Society; • BID Director of Brixton BID
Streatham	8 February 2022	<ul style="list-style-type: none"> • Cllr Malcolm Clark, Streatham Wells ward councillor (Labour and Co-operative); • Cllr Marianna Masters, Streatham Wells ward councillor (Labour and Co-operative); 	<ul style="list-style-type: none"> • Cllr Malcolm Clark, Streatham Wells ward councillor (Labour and Co-operative) • Office Manager to Bell Ribeiro-Addy

		<ul style="list-style-type: none"> • Cllr Mohammed Seedat, Streatham Wells ward councillor (Labour and Co-operative); • Cllr Matthew Bennett, Gipsy Hill ward councillor (Labour and Co-operative) • Bell Ribeiro-Addy MP, MP for Streatham (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Streatham Action • InStreatham BID • Local businesses on the Parade 	<ul style="list-style-type: none"> • BID Manager of InStreatham BID
Waterloo	10 February 2022	<ul style="list-style-type: none"> • Cllr Kevin Craig, Bishop's ward councillor (Labour and Co-operative); • Cllr Ibrahim Dogus, Bishop's ward councillor (Labour and Co-operative); • Cllr Jennie Mosley, Bishop's ward councillor (Labour and Co-operative) • Florence Eshalomi MP, MP for Vauxhall (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • WeAreWaterloo BID • South Bank and Waterloo Neighbours (SoWN) neighbourhood forum • South Bank Employers' Group • Waterloo Development Community Group • Coin Street Community Builders • Jubilee Gardens Trust 	<ul style="list-style-type: none"> • Two representatives from SoWN; • Chief Executive of South Bank Employers' Group; • Planning agent from Carney Sweeney, on behalf of Coin Street Community Builders; • Group Director of Coin Street Community Builders; • Chair of Jubilee Gardens Trust; • Director of Waterloo Development Community Group

Presentations

2.18. In addition to the above, Council Officers also delivered a number of virtual presentations during the Regulation 18 consultation to increase awareness and participation. This included information about the consultation, as well as some relevant example sites to

put the material in context. There was also an opportunity to ask questions during these sessions. Participants were directed to the formal channels (e.g. the Commonplace webpage) to make comments. Presentations were delivered to:

- Lambeth Forums Network (13th January)
- Lambeth Staying Healthy Partnership Board (18th January)
- Mosaic Clubhouse (19th January)
- Lambeth Safer Spaces working group (20th January)
- Guy's and St Thomas' Hospital (28th January)
- Lambeth Housing Partnership (28th January)
- WeAre336 (28th January)
- Organisations representing disabled people (2nd February)
- A British Sign Language (BSL) interpreter and closed captioning were provided to ensure the session was accessible. The following organisations were invited to attend: Action on Disability; Action on Hearing Loss; Age UK Lambeth; Alliance for Inclusive Education; Alzheimer's Society; Carers Hub; Cherry Groce Foundation; Community Support Network South London; Cycling Without Age; Disability Advice Service Lambeth; Disability Rights UK; Family Action; Healthwatch Lambeth; Inclusion London; Independent Lifestyle Options; Lambeth and Southwark Mind; Lambeth Parent Forum; L'Arche; Lifelong Family Links; Mencap; Mosaic Clubhouse; National Autistic Society; People First; Pocklington Trust; Royal Association for Deaf People; Royal London Society for Blind People; Share Community; Social Integration Commission; Transport for All; We Are 336; Wheels for Well-Being
- Black-led organisations (22nd February).
- Arranged through black-led organisation, the Mending Room, Council officers met with three local community organisers to discuss the Draft SADPD in the context of anti-racist urban design.

Workshops with Young People

2.19. As set above, young people were identified as a group with whom the Council has struggled to engage in the past. Typically, the Under 25s are the least represented age category in public consultations on planning policy in Lambeth.

2.20. In order to seek the views of young people, a number of workshops to discuss the Draft SADPD were held. These workshops were facilitated by ZCD Architects, who specialise

in youth engagement. Three areas were chosen for workshops due to the clusters of sites making it easier for the group to travel between sites during the sessions.

2.21. The following workshops took place:

- Waterloo (12th February)
12 participants aged approximately 13-18 years old attended from Coin Street Community Builders, Big Kid Foundation and Bright Centres. Sites 8 and 9 were visited and discussed.
- Brixton (14th February)
15 participants aged approximately 10-19 years old attended from CEF Lyncx. Sites 20 and 21 were visited and discussed.
- West Norwood (14th February)
6 participants aged approximately 11-17 attended from the Rathbone Society. Sites 18 and 19 were visited and discussed.

2.22. The Lambeth Youth Council were also invited to attend the workshops through the Youth Council co-ordinator.

2.23. Feedback from the workshops is included in Appendix H of the report.

Publicity and dissemination

2.24. A wide range of methods were used to raise awareness about the consultation and to encourage people to respond. The publicity methods aimed to target the full range of stakeholders, including those who had been characterised as 'un-engaged' or 'harder to engage'.

2.25. In addition to more traditional publicity methods, ward councillors, community groups and networks were encouraged to raise awareness about the consultation through word of mouth and 'cascading' amongst their constituents and members.

Notification email

2.26. A notification email was sent to all those on the Council's planning policy consultation database when the consultation went live on 11 January 2022. This consists of approximately 2,050 contacts, including the statutory, specific and general consultation bodies required by the regulations. The landowners and their representatives for the

proposed sites were also contacted via this notification email. An additional list of community stakeholders (collated from colleagues in the Sustainable Growth and Opportunity Directorate) who had recently engaged in consultations was also notified.

Social media

2.27. The Council publicised details of the consultation on their social media accounts, which include X (formerly known as Twitter), Facebook, LinkedIn and Nextdoor. Screenshots of this publicity can be seen in Appendix D.

2.28. Between 9 February and 22 February 2022, Commonplace also ran a targeted social media campaign to raise awareness of the consultation. Advertisements were placed on Facebook and Instagram and targeted to those who live in Lambeth. These sponsored posts were viewed by 19,926 users, 2,025 of whom visited the SADPD Commonplace site directly from the adverts. 25 representations were made on Commonplace by users who saw and engaged with the adverts.

Press release

2.29. A [blog post](#) was published as a press release on Love Lambeth on 2nd February. The blog post explained the purpose of the consultation, how to view the material and how to submit representations. A copy of the post is available in Appendix E of the report.

Newsletters

2.30. To reach a wider range of stakeholders, the consultation was publicised in a number of online newsletters/e-bulletins. Publication information included a link to the online consultation material and contact details for the Planning Policy team for further questions. This publicity was included in the following newsletters:

- Lambeth Biodiversity Forum (17th January)
- Lambeth First (18th January)
- Lambeth Schools Partnership (19th January)
- Lambeth 500 (24th January)
- Lambeth Climate Action, Clean Transport and Sustainability News (3rd February)
- Coldharbour Community Early Help Update (9th February)

2.31. Furthermore, publicity to attract additional participants to the workshop with young people was included in the Youth and Play e-bulletin on 28th January. Screenshots of these newsletters are set out in Appendix F.

2.32. Local community-led organisations were also encouraged to publicise the consultation in their newsletters. This was done via community groups and BIDs.

Integrate

2.33. Lambeth currently subscribes to [Integrate](#), a directory of voluntary, community and social enterprise sector organisations that operate in the borough. A notification email was sent to the 1,141 groups in Integrate's network on 13th January 2022, which explained the purpose of the consultation and how to respond. This email was viewed 1,501 times. A copy of the email is available in Appendix G of the report.

Libraries

2.34. Physical copies of the Draft SADPD and draft SustA were displayed in all of Lambeth's ten public libraries. Copies were also available to view by appointment at Lambeth Civic Centre.

2.35. Librarians were informed how to provide assistance to those not confident using the consultation material or submitting representations.

Website

2.36. Information about the consultation was also included on the Planning Policy webpage on the Council's website. The consultation was also featured on the homepage of the council's website, under the 'Have Your Say' section. Both webpages had a link to the Commonplace site and information on how to respond to the consultation. Screenshots of the webpage are set out in Appendix H of the report.

3. CONSULTATION RESPONSE

3.1. Over the course of the six-week consultation, 3,308 representations were made by 1,876 unique respondents.

- 3.2. 1,329 respondents made representations by email and 547 on Commonplace. This equates to 1,493 representations made by email and 1,815 made on Commonplace.
- 3.3. Figure 1 below shows the number of representations made per site. Site 19 and Site 18 received the most representations, with 1,470 and 1,317 made respectively.

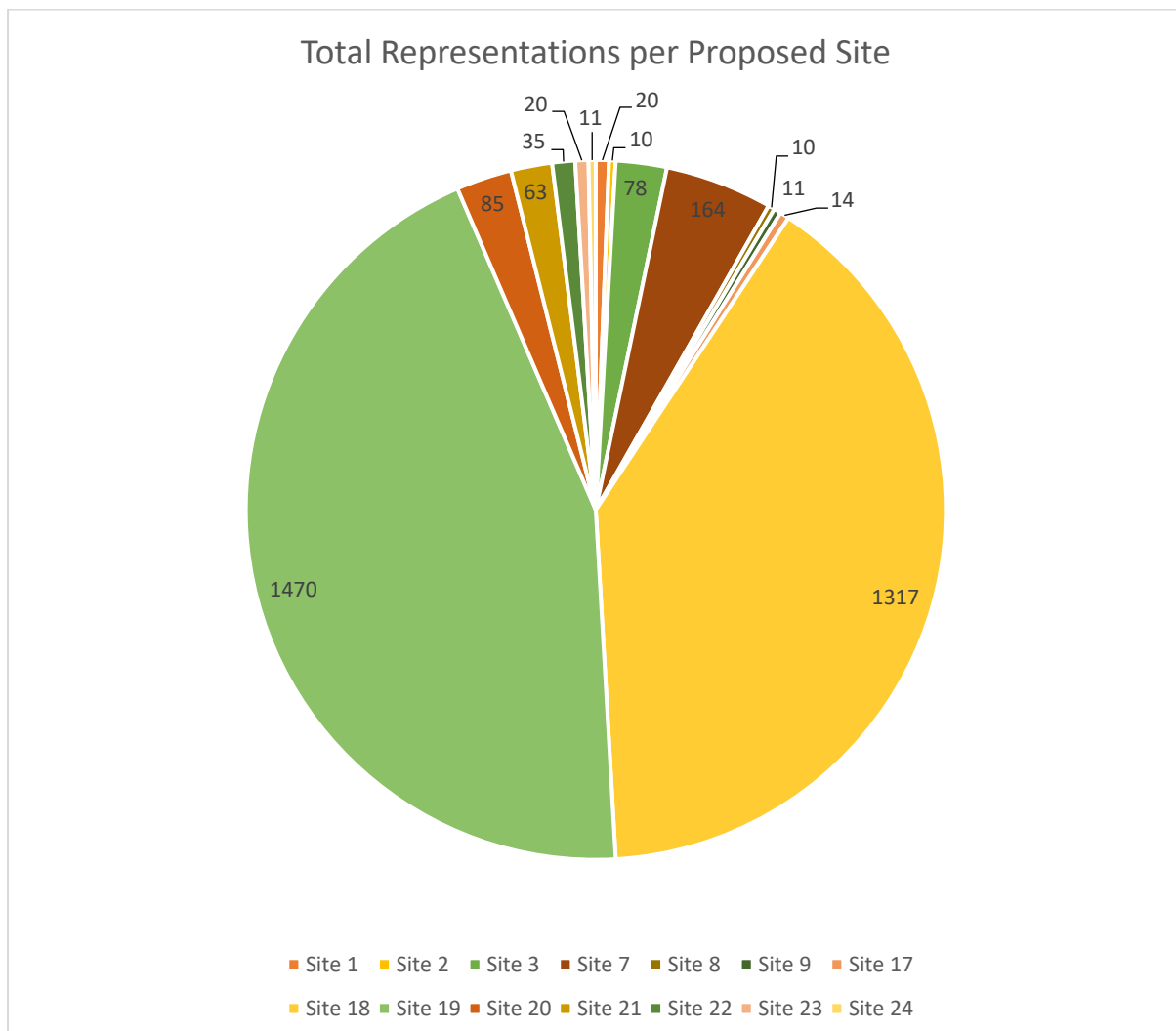


Figure 1. Total representations per proposed site

- 3.4. In addition to comments on the proposed sites, 17 representations were made proposing new sites to be included in the next iteration of the SADPD. Detailed responses to each of these representations have been included in Appendix J of this report.

Respondents

- 3.5. A range of stakeholders responded to the consultation, the majority of which. 96% were individuals.

3.6. Table 3 provides a breakdown of the respondents by type:

Table 3. Respondent by type

Type of respondent	Number of responses received	Respondent to Reg 18 consultation
Affordable housing provider	2	Savills on behalf of Notting Hill Genesis
		Metropolitan Thames Valley
Business	11	Unnamed business owner (x3)
		Natwest, Streatham Branch
		Lambeth Co-operative Development Agency
		Iceland Norwood Road Branch
		Leaseholder
		Portobello Brewery (freeholder 1)
		Portobello Brewery (freeholder 2)
		Iceland Foods
		West Norwood Service Station
Business improvement district	2	Station to Station
		inStreatham BID
Community group	12	Mosaic Clubhouse
		Friends of Hillside Gardens Park
		Norwood Society
		Herne Hill Society
		Mums for Lungs
		Friends of West Norwood Cemetery
		Brixton Society
		Knolly's Yard Community Group
		Norwood Forum
		Norwood Action Group
		Streatham Action
		Waterloo Community Development Group
Developer/landowner	21	Brixton Unitarian Church
		Landowner (anonymous)

Type of respondent	Number of responses received	Respondent to Reg 18 consultation
		Agent on behalf of LPPI Real Estate Fund
		Rolfe Judd on behalf of Union Jack Club
		BNPP on behalf of Marlin Apartments
		Gerald Eve on behalf of Stanhope PLC
		Carney Sweeney on behalf of Coin Street Community Builders
		ID Planning on behalf of King's College Hospital Foundation Trust
		DP9 on behalf of MEC London Property 3 Ltd
		Savills on behalf of Guy's and St Thomas' Foundation
		WSP on behalf of GSTT
		Savills on behalf of Harris Housing
		Transport for London Commercial Development
		Iceni on behalf of Telereal Trillium and Arch Company
		Daniel Watney on behalf of Ecoworld
		Montagu Evans on behalf of HSBC
		DP9 on behalf of Bourne Capital
		DP9 on behalf of London Heights
		DP9 on behalf of Leos International
		Lambeth Accord
		Planning Potential on behalf of Aldi Stores Ltd
Elected politician	9	Labour Group Cllr Princes Ward
		Cllr Scarlett O'Hara, Coldharbour ward councillor (Labour and Co-operative)
		Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative)
		Labour & Co-operative Candidates for St Martin's Ward
		Knights Hill ward councillors
		Thurlow Park councillors and candidates for West Dulwich ward

Type of respondent	Number of responses received	Respondent to Reg 18 consultation
		Tulse Hill ward councillor
		Lambeth Green Group
		Labour & Co-operative Assembly Member
Faith group	0	N/A
Individuals	1,797	Names not published
Infrastructure provider	2	Thames Water
		Avison Young on behalf of National Grid
Lambeth partnerships	1	Lambeth Health and Wellbeing Partnership
Neighbourhood Planning Forum	3	South Bank & Waterloo Neighbours
		Kennington Oval and Vauxhall Neighbourhood Forum
		Norwood Planning Assembly
Other local authorities	2	Surrey CC, Minerals and Waste Planning Policy Team
		Gloucester County Council, Minerals & Waste Planning Policy
Other statutory consultee (including the GLA, HE, EA, NE)	8	Coal Authority
		Natural England
		Sport England
		Highways England
		Transport for London
		Historic England
		GLA
		Environment Agency
Representative body	0	N/A
Tenants'/residents' association	6	Lancaster Avenue Residents Association
		Greenham Close TRA
		Thurlow Towers Residents Association
		Residents of Vale Living Retirement Village
		Residents of Baytree Road and Porden Road

Type of respondent	Number of responses received	Respondent to Reg 18 consultation
		Mulberry Housing Co-op
Total	1876	

3.7. Those who responded via Commonplace were asked optional questions about their demographic characteristics. The data collected is presented below. Note that as the majority chose to make representations by email, where demographic characteristics were not asked for, the data only reflects a maximum of 29% of respondents (i.e. from the Commonplace platform). Within that 29%, not all respondents on Commonplace opted to provide demographic information.

3.8. Regarding age, the question asked was 'What is your age group?'. Responses are summarised in Table 4 below.

Table 4. Respondents by age group

Age range	Percentage
16-24	<1%
25-34	9%
35-44	19%
45-54	19%
55-64	13%
65-74	9%
75-84	2%
85 or over	<1%
Prefer not to say	28%

3.9. With regard to gender, the question asked was 'What is your gender'. Responses are summarised in Table 5 below.

Table 5. Respondents by gender

Gender	Percentage
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Male	48%
Female	46%
Other	<1%
Prefer not to say	5.6%

3.10. In relation to ethnicity, the question asked was 'What is your ethnic group?'. Responses are summarised in Table 6 below.

Table 6. Respondent by ethnicity

Ethnicity	Percentage
White - English/Welsh/Scottish/Northern Irish/British	77%
White - Irish	2%
White - Gypsy or Irish Traveller	<1%
Other White	12%
Mixed/Multiple ethnic groups - White and Black Caribbean	<1%
Mixed/Multiple ethnic groups - White and Black African	<1%
Mixed/Multiple ethnic groups - White and Asian	<1%
Other Mixed/Multiple	1%
Asian/Asian British - Indian	<1%
Asian/Asian British - Pakistani	<1%
Asian/Asian British - Bangladeshi	0%
Asian/Asian British - Chinese	0%
Other Asian/Asian British	0%
Black/African/Caribbean/Black British - African	<1%
Black/African/Caribbean/Black British - Caribbean	2%
Other Black/African/Caribbean/Black British - Please describe	<1%
Other ethnic group - Arab	<1%
Other ethnic group	1%

3.11. Regarding employment status, respondents were asked 'What is your employment status?'. Responses are summarised in Table 7 below.

Table 7. Respondent by employment status

Employment status	Percentage
Working full-time	45%
Working part-time	7%
Zero-hour contract	<1%
Self-employed	10%
Student	<1%
Retired	9%
Unemployed	<1%
Other	2%
Prefer not to say	26%

3.12. In relation to disability, respondents were asked 'Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?'. Responses are summarised in Table 8 below.

Table 8. Respondent by day-to-day activities limitation

Day to day activities limited because of a health problem or disability	Percentage
Yes - a lot	4%
Yes - a little	14%
No	80%
Prefer not to say	2%

4. SUMMARY OF REPRESENTATIONS

A summary of the representations received during the consultation are set out in the tables below:

Site 1: Royal Street SE1

Table 9. Site 1: Royal Street S1 – Summary Table

Overview	
Representation breakdown	<p>18 respondents commenting on Site 1, of which:</p> <ul style="list-style-type: none"> ○ 10 individuals (56%) ○ 4 Statutory Consultees (22%): <i>Transport for London (TfL), Historic England, Greater London Authority, Environment Agency</i> ○ 1 community groups or charities (6%): <i>Waterloo Community Development Group</i> ○ 1 Neighbourhood Planning Forum (6%): <i>SoWN</i> ○ 2 developers/landowners (11%): <i>Gerald Eve on behalf of Stanhope PLC, Savills on behalf of Guy's and St Thomas' Foundation</i> <ul style="list-style-type: none"> ○ 11% in broad overall support of the approach ○ 6% neutral to the approach ○ 50% mixed response ○ 33% objecting to the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Non-specific support • Improved life sciences district • Improved community / cultural facilities • Transport improvements • Support for car free development • Support for provision of affordable housing • Support for provision of housing • Support for heritage asset retention • Support for provision of affordable workspace • Improved cycling infrastructure • Improved access/servicing • Support for green infrastructure improvements • Improved urban landscape • Improved public realm • Suitable location for taller buildings • Support for exclusion of Class E uses outside retail cluster

Summary of main points raised in objection to the proposed approach		
General	<ul style="list-style-type: none">• Excessive building height• Concerns about design/building quality• Concern about loss of current small businesses on site• Negative impact on green infrastructure and biodiversity• Policy restricts potential for development• Overdevelopment/too dense• Proposals are profit-led/to benefit developers• Concerns about public safety/crime• Site has potential to accommodate more than replacement housing• Insufficient justification for this quantum of offices• Not consistent with Neighbourhood Plan• Development will cause increase in traffic/air quality issues• Negative impact on public transport infrastructure• Negative heritage impact• Inadequate affordable housing provision• Insufficient justification for this quantum of affordable workspace• Regenerate the whole area, not just individual sites	
Summary of comments on different sections of Draft SADPD for Site 1		
Context	n/a	
Vision	Response No. of Respondents Percentage of Respondents	
	Very unhappy 3 18%	
	Unhappy 0 0%	
	Neutral 3 18%	
	Happy 1 6%	
	Very happy 3 18%	
	No response 7 41%	
	<ul style="list-style-type: none">• Include a north/south link through from Upper Marsh to Archbishop's Park• Redesign traffic and regenerate spaces under railway bridge• Achieve density through walk-up 5-6 storey development• Queries in relation to what will happen to Iklectik, an existing community music/arts venue on the site.	
	Site Allocation Policy	<ul style="list-style-type: none">• Strengthen reference to potential for SC1 life sciences district - proposed wording provided• Wording on heritage assets should be amended as too restrictive - proposed wording provided• Add bullet point on building heights to ensure flexibility - proposed wording provided• Require more housing

	<ul style="list-style-type: none"> • Tall buildings - North of Royal Street insufficient emphasis on good urban design, well-spaced for good townscape • Tall buildings - risk of canyon effect on Lambeth Palace Road in combination with site 2 • Link to Upper and Lower Marsh needs to be improved/straightened/create straight view from Lower Marsh to hospital • Any interventions on TLRN will be subject to TfL agreement • Street trees should be protected • Transport mitigation should include contributions to buses, Waterloo Northern Line step free access, low line facilitation, cycle hire capacity, legible London signage • Expect a substantial reduction in on-site parking • Opportunity to rationalise servicing off-street • Development would have to be car free • Express building heights as maximum rather than general building height • Protect groundwater from contamination sources - contamination from adjacent railway • Include space for laundry, cafes, restaurants, supermarket for local residents • Move last paragraph on heights to section on movement and public realm • Proposed amendment to wording on residential amenity • Need distinct vision to deliver active frontages in this location • Potential to deliver a much richer mix of activities • Need greater emphasis on preservation of the setting and openness of Archbishop's Park • Need more sophisticated approach to materials to express local character - not materials that mimic Portland stone • Tall buildings - site not appropriate for buildings over 30m and must be kept low adjacent to Park • Existing open space must be replaced within the site • All the replacement housing should be affordable • Specify mechanism by which MedTech space will be secured • Social infrastructure will be needed - use school building and 10 Royal Street for this • State clearly that Lambeth Palace Road needs clear definition through new development on sites 1 and 2 • Include more streetlights, cameras and night-time businesses to improve personal safety • Use glass and light stone or brick, not dull black bricks like Plaza Hotel on Hercules Road • Improve the paths, entrances, signs and lighting in Archbishop's Park to improve safety • Development should be car free and new residents unable to purchase CPZ permits • Make clear the level of office space to be re-provided
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Summary of comments on other documents made available for Site 1

Main evidence document	<ul style="list-style-type: none"> • Produce a Heritage Impact Assessment that reflects ICOMOS HIA guidance, assessing cumulative impact of Sites 1 and 2 • Evidence does not address implications of the Evelina Hospital approval and cumulative harm that might arise. • Various clarifications to evidence proposed • Concern about reliance on 'recessive architecture' to address massing – not sound basis for townscape development • Modelling demonstrates that tall buildings are not in fact appropriate, notwithstanding Local Plan Annex 10 • Consider views from public viewing platform in Lambeth Palace Library
Flood risk	n/a
Sustainability appraisal	n/a

Site 2: St Thomas' Hospital SE1

Table 10. Site 2: St Thomas's Hospital SE1 – Summary Table

Overview	
Representation breakdown	<p>9 respondents commented on Site 2, or which:</p> <ul style="list-style-type: none"> ○ 2 individuals (22%) ○ 4 Statutory Consultees (44%): <i>Transport for London, Historic England, Greater London Authority, Environment Agency</i> ○ 1 community groups or charities (11%): <i>Waterloo Community Development Group</i> ○ 1 Neighbourhood Planning Forum (11%): <i>SoWN</i> ○ 1 developers/landowners (11%): <i>WSP on behalf of GSTT</i> <ul style="list-style-type: none"> ○ 0% in broad overall support of the approach ○ 56% neutral to the approach ○ 33% mixed response ○ 11% objecting to the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Support for inclusion as site allocation • Support approach to re-provision of Florence Nightingale Museum • Welcome recognition of site's contribution to MedTech cluster • Welcome acknowledgement of OUV of WWHS
Summary of main points raised in objection to the proposed approach	
General	<ul style="list-style-type: none"> • Building on whole site up to 44m would be harmful • Harmful impact on pedestrian environment on Lambeth Palace Road • Harmful impact on views • Object to the quantum of proposed development on the site • Harmful impact on heritage assets • Approach limits potential for tall buildings in parts of site • Merge sites 1 and 2 into one allocation • Approach may limit potential future development opportunities • Retrofit rather than redevelop because of climate emergency
Summary of comments on different sections of Draft SADPD for Site 2	
Context	Site allocation boundary should include whole St Thomas' Hospital site

Vision	Response	No. of Respondents	Percentage of Respondents
	Very unhappy	1	11%
	Unhappy	0	0%
	Neutral	1	11%
	Happy	0	0%
	Very happy	1	11%
	No response	6	67%
	<ul style="list-style-type: none">Should be car free with no access to local CPZ for occupiersRetrofit because of climate emergency		
Site Allocation Policy	<ul style="list-style-type: none">Development should not worsen the pedestrian environment on Lambeth Palace Road/Westminster Bridge RoadDevelopment should complement/preserve/enhance nearby listed buildings/spacesMake clear that gaps between buildings need to be maintained/createdImprove legibility and clarity to routes within and through the siteInclude more guidance on scale and height parameters - particularly Blocks A and BOpportunity to improve pedestrian connectivity to the riversideOpportunity to rationalise existing vehicle crossovers on Lambeth Palace Road, subject to TfL agreementNeed to protect street treesMay require contributions to buses, Waterloo Northern line step free access, cycle hire, Legible LondonExpect substantial reduction in on-site car parkingOpportunity to rationalise servicing off streetCar free development due to PTALState need to submit desk-based assessment within Archaeological Priority Areas upon applicationAdd need to protect groundwater from contamination sources (hospital use)		
Summary of comments on other documents made available for Site 2			
Main evidence document	<ul style="list-style-type: none">No view that illustrates impact on Lambeth Palace RoadInclude more testing for Blocks A and BShould include Heritage Impact Assessment that reflects ICOMOS HIA guidanceReview the potential for height on the site in collaboration with the Hospital TrustSay up to 44m is tall buildingModel cumulative impacts with Site 1 on WWHSUse a masterplanning approach to understand distribution of development		
Flood risk	n/a		
Sustainability appraisal	n/a		

Site 3: 35-37 and Car Park Leigham Court Road SW16

Table 11. Site 3: 35-37 and Car Park, Leigham Court Road SW16 – Summary Table

Overview	
Representation breakdown	<p>64 respondents commented on Site 3, of which:</p> <ul style="list-style-type: none"> ○ 59 individuals (92%) ○ 2 Statutory Consultees (3%): <i>Transport for London; Environment Agency</i> ○ 1 community groups (2%): <i>Streatham Action</i> ○ 1 business (2%) ○ 1 Business Improvement District (2%): <i>InStreatham</i> ○ 11% in broad overall support of the approach ○ 8% neutral to the approach ○ 5% mixed response ○ 77% objecting to the overall approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Support for car park to be removed • Contribution towards Healthy Streets improvements may be appropriate as part of transport mitigation package • Support development of the site – office above and residential at rear or a hotel – but want car parking to be included • Support the proposal only if it is linked with redevelopment of bowling green and disused synagogue
Summary of main points raised in objection to the proposed approach	
General	<ul style="list-style-type: none"> • Loss of carpark • Local business/high street impact from loss of car park • Improve parking provision with electric charging points, better lighting, security and new public toilets • Redevelopment should include bowling green and disused synagogue • Site ideal for market or other public active space • Site should retain Streetcare Team presence/accommodation of equipment
Summary of comments on different sections of Draft SADPD for Site 3 (relating to specific comments about wording)	

Context	<ul style="list-style-type: none">• Area to rear of toilets provides base for Lambeth Street Care team• South Lodge 45 Leigham Court Road is wrongly described as a nursing home; it is sheltered housing• Seek replacement toilets• Seems likely Leigham Court Road will shortly be the dividing line between two LTN's• The site is located within the Source Protection Zone 2• Potential contamination from car park																					
Vision	<table><tr><th>Response</th><th>No. of Respondents</th><th>Percentage of Respondents</th></tr><tr><td>Negative</td><td>20</td><td>31%</td></tr><tr><td>Mostly negative</td><td>3</td><td>5%</td></tr><tr><td>Neutral</td><td>6</td><td>9%</td></tr><tr><td>Mostly positive</td><td>4</td><td>6%</td></tr><tr><td>Positive</td><td>5</td><td>8%</td></tr><tr><td>No Response</td><td>26</td><td>41%</td></tr></table>	Response	No. of Respondents	Percentage of Respondents	Negative	20	31%	Mostly negative	3	5%	Neutral	6	9%	Mostly positive	4	6%	Positive	5	8%	No Response	26	41%
Response	No. of Respondents	Percentage of Respondents																				
Negative	20	31%																				
Mostly negative	3	5%																				
Neutral	6	9%																				
Mostly positive	4	6%																				
Positive	5	8%																				
No Response	26	41%																				
Site Allocation Policy	<ul style="list-style-type: none">• Protect groundwater from contamination sources. Contamination from car park• Reprovide toilets• Redevelopment should be restricted to area of toilets only• Retain carpark with security• Not correct to say car park has been closed for several years – only been a few months• Low level and communal feel to other shops is good• Concern for genuinely affordable housing• Reprovide base for street cleaning services• Active frontage not required• Wider redevelopment with adjacent sites• Agree site not suitable for tall building• Support protection of trees																					
Summary of comments on other documents made available for Site 3																						
Main evidence document	<ul style="list-style-type: none">• Incorrect to say car park has been closed for several years• Incorrect to state synagogue is to rear of 43 Leigham Court Road; it is actually to rear of 45 Leigham Court Road but is adjacent to far end of car park from its entrance• Site is wasted and derelict so restoration or regeneration of site would be good, depending on local impact• Support protection of trees																					
Flood risk	n/a																					
Sustainability appraisal	<ul style="list-style-type: none">• Dedicated space for deliveries & servicing the site to be allocated from adjoining roads to reduce local car storage. Access to car storage encourages car use.• The area around there is already covered in litter and the pavement is tight due to positioning of bus stop. Would support this project if it meant more resources to make the area cleaner and clearer.																					

	<ul style="list-style-type: none"> • Community will lose space that is currently publicly accessible, with little benefit in return. • Sustainability Appraisal does not recognise that the site provides a base for Lambeth's town centre street care functions, scorings for Item 14 are likely to be too favourable.
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Site 7: 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11

Table 12. Site 7: 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11 – Summary Table

	Overview
Representation breakdown	<p>111 respondents commenting on Site 7</p> <ul style="list-style-type: none"> ○ 105 individuals (95%) ○ 3 Statutory Consultees (3%): <i>Transport for London, Greater London Authority, Environment Agency</i> ○ 1 Neighbourhood Planning Forum (1%): <i>Kennington, Oval and Vauxhall (KOV) Neighbourhood Forum</i> ○ 1 elected politicians or electoral candidates (1%): <i>Labour Group Cllrs Princes Ward</i> ○ 1 developers/landowners (1%): <i>DP9 on behalf of London Heights</i> <ul style="list-style-type: none"> ○ 3% in broad overall support of the approach ○ 1% neutral to the approach ○ 26% mixed ○ 70% objecting to one or more aspect of the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Support for provision of housing • Non-specific support • Support for provision of employment uses • Transport improvements • Support for provision of affordable homes • Suitable location for taller buildings • Improved public realm • Support for widened pavement • Support for car free development • Improved cycling infrastructure • Better use of space • Support for massing
Summary of main points raised in objection to the proposed approach	
General	<ul style="list-style-type: none"> • Excessive building height • Negative impact on character/visual amenity • Negative daylight & sunlight impact • Negative heritage impact • Concerns about access/servicing • Overlooking/loss of privacy • Concern about noise pollution

	<ul style="list-style-type: none">• Development will cause increase in traffic/congestion/air quality issues• Overdevelopment/too dense• Concern about carbon footprint / net zero• Concerns about design/building quality• Concern with specific content of DPD• Negative Impact on Infrastructure (general)• Proposals are profit-led/to benefit developers• Negative impact on views• Negative impact on green infrastructure and biodiversity• Increased parking difficulties• Negative health impacts• Policy requirements will mean increased height• Crowded/increased population density• Construction will cause disruption/noise• Negative impact on social infrastructure• Non-specific objection• Concern about fire/building safety• Inadequate affordable housing provision• Negative impact on public safety/crime• Widening pavement is impractical• Concern about balance of uses• Negative impact on public transport infrastructure• Insufficient information• Inadequate consultation/fuller engagement with the community required• Redevelopment is unnecessary• Insufficient or inappropriate public realm• Concern about wind tunnel effect• Concern about loss of value/negative impact on value• Incremental change needed• Replacement community use unnecessary• Inappropriate scope of site allocation• Scope for more development• No need for wider pavements• Concern about rent levels• Need to have regard to road network• Need transport contributions																		
Summary of comments on different sections of Draft SADPD for Site 7 (relating to specific comments about wording)																			
Context	None																		
Vision	<table><tr><th>Response</th><th>No. of Respondents</th><th>Percentage of Respondents</th></tr><tr><td>Negative</td><td>29</td><td>26%</td></tr><tr><td>Mostly negative</td><td>5</td><td>5%</td></tr><tr><td>Neutral</td><td>2</td><td>2%</td></tr><tr><td>Mostly positive</td><td>7</td><td>6%</td></tr><tr><td>Positive</td><td>5</td><td>5%</td></tr></table>	Response	No. of Respondents	Percentage of Respondents	Negative	29	26%	Mostly negative	5	5%	Neutral	2	2%	Mostly positive	7	6%	Positive	5	5%
Response	No. of Respondents	Percentage of Respondents																	
Negative	29	26%																	
Mostly negative	5	5%																	
Neutral	2	2%																	
Mostly positive	7	6%																	
Positive	5	5%																	

	<p>No Response 63 57%</p> <p>The stated heights on the vision map for the existing buildings around this site are factually incorrect.</p> <p>The indicative servicing route appears to extend to Dugard Way which is contrary to site allocation policy text.</p>
Site Allocation Policy	<ul style="list-style-type: none"> • Request for various detailed building and design standards to be added. • Policy should reflect London Plan Policy E7C and incorporate the need to provide essential services to the CAZ. • Should make it clear that the 50% affordable housing threshold only applies to the land which is considered to be 'public land' for the purposes of the Mayor's threshold approach and not the land in private ownership where the 35% threshold will apply. • Proposals for changes to the access affecting the signalised junction and relocation of the crossing would need to be subject to a TfL Road Safety Audit and Technical Approvals process. • Add text "Protect groundwater from contamination sources". • Detailed points relating to type, scale, acceptability and implementation of development – greater clarity and flexibility sought.
<p>Summary of comments on other documents made available for Site 7</p>	
Main evidence document	<ul style="list-style-type: none"> • Insufficient information about whether the proposed policy is likely to be feasible and therefore achievable. • Insufficient information about likely BRE impact breaches and environmental impacts, and how the proposal will meet zero carbon goals. • Daylight and sunlight analysis questioned. • Question some comments on views, in particular some of the assessment of local views misrepresents the likely effects. • Further information is required behind the rationale as to why a building can only be provided if two sites are bought forward together.
Flood risk	None
Sustainability appraisal	Insufficient information about how the development is going to preserve the existing environment and heritage sites.

Site 8: 110 Stamford Street SE1

Table 13. Site 8: 110 Stamford Street SE1 – Summary Table

Overview	
Representation breakdown	<p>10 respondents commented on Site 8, of which:</p> <ul style="list-style-type: none"> ○ 3 individuals (30%) ○ 3 Statutory Consultees (30%): <i>Transport for London, Greater London Authority, Environment Agency</i> ○ 1 tenants'/residents' associations or groups (10%): <i>Mulberry Housing Co-op</i> ○ 1 community groups or charities (10%): <i>Waterloo Community Development Group</i> ○ 1 Planning Forum (10%): <i>SoWN</i> ○ 1 developers/landowners (10%): <i>Carney Sweeney on behalf of Coin Street Community Builders</i> <ul style="list-style-type: none"> ○ 0% in broad overall support of the approach ○ 10% neutral to the approach ○ 40% mixed response ○ 50% objecting to the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Support as housing is the primary need • Support housing with community use • Support inclusion of site allocation to encourage landowner to develop it or return land to public ownership • Support approach to optimisation • Support delivery of family housing on this site • Agree not appropriate for tall building
Summary of main points raised in objection to the proposed approach	
General	<ul style="list-style-type: none"> • Need greater emphasis on affordable housing on the site/if possible 100% AH/history of land is for affordable housing • Set back of building line unnecessary - large area of pavement with no purpose • Landowner evidence suggests only 20 flats are possible • Community facilities rather than housing are the priority to meet unmet need amongst young and older people • Height of proposed approach likely to harm adjacent housing/Iroko • River transport not appropriate as site not on river but on TLRN • London Plan policy prioritises offices and other CAZ strategic functions over housing in this location • Scope for nearer 50 flats on the site, given servicing can be shared with Neighbourhood Centre

	<ul style="list-style-type: none">No need for further social infrastructure on this site given the Neighbourhood Centre is under-usedSite should provide social housing and workspaces for residents to develop businesses																					
Summary of comments on different sections of Draft SADPD for Site 8 (relating to specific comments about wording)																						
Context	n/a																					
Vision	<table><tr><th>Response</th><th>No. of Respondents</th><th>Percentage of Respondents</th></tr><tr><td>Very unhappy</td><td>1</td><td>10%</td></tr><tr><td>Unhappy</td><td>0</td><td>0%</td></tr><tr><td>Neutral</td><td>1</td><td>10%</td></tr><tr><td>Happy</td><td>1</td><td>10%</td></tr><tr><td>Very happy</td><td>0</td><td>0%</td></tr><tr><td>No Response</td><td>7</td><td>70%</td></tr></table>	Response	No. of Respondents	Percentage of Respondents	Very unhappy	1	10%	Unhappy	0	0%	Neutral	1	10%	Happy	1	10%	Very happy	0	0%	No Response	7	70%
Response	No. of Respondents	Percentage of Respondents																				
Very unhappy	1	10%																				
Unhappy	0	0%																				
Neutral	1	10%																				
Happy	1	10%																				
Very happy	0	0%																				
No Response	7	70%																				
Site Allocation Policy	<ul style="list-style-type: none">Massing must not harm residents of Iroko housing or their outdoor spaceRevisit the building line/area of public realmKeep building height in line with adjacent Neighbourhood Centre, not King'sOpportunity for street trees along Stamford Street?Interventions on the TLRN will need TfL agreementOpportunity to improve quality of the footway through s278 agreement with TfLProvision of community facilities on site obviates need for further assessment - state in policyProvision of community facilities on site obviates need for open space contribution - state in policyAdd protect groundwater from contaminationRetention of car park ramp needs more thought to address safety and security issuesServicing should be via the existing ramp into basement of Iroko and Site 8, not Stamford Street																					
Summary of comments on other documents made available for Site 8																						
Main evidence document	<ul style="list-style-type: none">Support constraints and opportunities identifiedSupport the indicative approach to massing and height																					
Flood risk	n/a																					
Sustainability appraisal	n/a																					

Site 9: Gabriel's Wharf and Princes Wharf, Upper Ground SE1

Table 14. Site 9: Gabriel's Wharf and Princess Wharf, Upper Ground SE1 – Summary Table

Overview	
Representation breakdown	<p>11 respondents commented on Site 9, of which:</p> <ul style="list-style-type: none"> ○ 4 individuals (36%) ○ 3 statutory consultees (27%): <i>Transport for London, Historic England, Environment Agency</i> ○ 1 tenants'/residents' association or group (9%): <i>Mulberry Housing Co-op</i> ○ 1 community groups or charities (9%): <i>Waterloo Community Development Group</i> ○ 1 Neighbourhood Planning Forum (9%): <i>SoWN</i> ○ 1 developer/landowners (9%): <i>Carney Sweeney on behalf of Coin Street Community Builders</i> <ul style="list-style-type: none"> ○ 9% in broad overall support of the approach ○ 0% neutral to the approach ○ 55% mixed response ○ 36% objecting to the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Support development for mixed use with housing • Support for affordable housing on the site • Support for affordable workspace on the site • Support for tall buildings • Support for sheltered housing of some sort
Summary of main points raised in objection to the proposed approach	
General	<ul style="list-style-type: none"> • Massing/height/quantums too big • Southbank should be for the public to enjoy culture, open spaces, street food/like Gabriel's Wharf • Historic commitment to affordable housing on this site should be maintained/potential for 100% AH • Large offices not supported • Loss of route between the wharves removes vibrancy • Encourage small business units/independent businesses, not chains • Building substantially taller than surrounding low/mid-rise does not reflect character of area • 72 Upper Ground – opposition to scale proposed on that site/proposals should not influence policy for this site • More tall buildings on the river front will damage the character of Queen's Walk • Landowner wants to develop nursing home (not housing), with workspace, community facilities and piazza • Affordable workspace is not a priority need in Waterloo - prioritise other matters

	<ul style="list-style-type: none"> Proposed relationship with Bernie Spain Gardens incompatible with current improvements Proposed approach reduces permeability between Upper Ground and riverside walk Need more effective engagement with the landowner
Summary of comments on different sections of Draft SADPD for Site 9 (relating to specific comments about wording)	
Context	n/a
Vision	Response No. of Respondents Percentage of Respondents
	Negative 0 0%
	Mostly negative 1 9%
	Neutral 1 9%
	Mostly positive 1 9%
	Positive 0 0%
	No Response 8 73%
Site Allocation Policy	<ul style="list-style-type: none"> Secure highest quality design of buildings on this site Transport mitigation should include contribution to Spine Route River walls will need to be raised to increase resilience to rising sea levels - refer to TE2100 plan Refer to London Plan Policy SI 12 Protect groundwater from contamination sources Protect riverside buffer zones and flood defences from further encroachment/development Employment and skills should be for Waterloo neighbourhood Need improved digital connectivity Do not lose more trees to terrorism mitigation Buildings should set back from public open space and avoid overshadowing Balance housing with outdoor social space for local residents, workers and visitors Provision of community facilities on site obviates need for further assessment - state in policy Provision of community facilities on site obviates need for open space contribution - state in policy Requirement to retain mock Tudor building should be removed as inhibits delivery
Summary of comments on other documents made available for Site 9	
Main evidence document	<ul style="list-style-type: none"> Revisit building line next to Bernie Spain Gardens Further TVIA images needed to support building of 44m on this site Revisit route through on western side of site TVIA view 6 is unacceptable - wall of development along Upper Ground

	<ul style="list-style-type: none"> • Use Oxo Tower as baseline for height • Identify harm to view from Waterloo Bridge • The extent of the roots of the trees on Bernie Spain Gardens is not 9m - not based on evidence
Flood risk	n/a
Sustainability appraisal	n/a

Site 17: 330-336 Brixton Road SW9

Table 15. Site 17: 330-336 Brixton Road SW9

Overview	
Representation breakdown	<p>13 respondents commenting on Site 17:</p> <ul style="list-style-type: none"> ○ 7 individuals (54%) ○ 3 Statutory Consultees (23%): <i>TfL, GLA, Environment Agency</i> ○ 1 community group or charity (8%): <i>Brixton Society</i> ○ 1 elected politician or electoral candidate (8%): <i>Cllr J Meldrum</i> ○ 1 developer/landowner (8%): <i>Lambeth Accord</i> ○ 8% in broad overall support of the approach ○ 8% neutral to the approach ○ 23% providing a mix of responses ○ 62% objecting to one or more aspect of the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Support for retention of 336 Brixton Road façade because of its architectural/heritage significance • Support for proposed layout • Support for proposed heights • Support for pedestrian route • Support for improvements to the street frontage/public realm • Support for protection of existing industrial capacity
Summary of main points raised in objection to the proposed approach	
General	<ul style="list-style-type: none"> • Concern with specific content of DPD • Concern about retention/provision of disabled parking • Objection to loss of petrol station and associated retail Site allocation should not restrict sites being redeveloped separately • Winans Walk should still provide servicing • Loss of 336 Brixton Road and health use would impact on community services • Provision of housing limits the scope for business use • Objects to demolition of existing buildings due to embodied carbon • Office in this location is not consistent with London Plan policy • Building at 336 Brixton Road is inefficient and provides poor disabled access – should be replaced not retained • Objects to provision of workspace

	<ul style="list-style-type: none"> • Insufficient regard to 'climate emergency' • Inadequate consultation • Space for servicing/deliveries should be provided on nearby streets • Objects to retention of 336 Brixton Road – architectural style is out of keeping with Conservation Area
Summary of comments on different sections of Draft SADPD for Site 17 (relating to specific comments about wording)	
Context	None
Vision	Response No. of Respondents Percentage of Respondents
	Negative 1 8%
	Mostly negative 1 8%
	Neutral 2 15%
	Mostly positive 2 15%
	Positive 4 31%
	No Response 3 23%
Site Allocation Policy	<ul style="list-style-type: none"> • Brixton Society - Winans Walk requires a hammerhead turning bay if used for servicing • The requirement for Winans Walk to be used for servicing should be made clearer • All vehicle crossovers should be removed from Brixton Road • The affordable housing threshold in relation to public land should be clarified • Policy should refer to Policy E7C, paragraph 6.4.7 and Policy E3A of the London Plan • Additional text "Protect groundwater from contamination sources" • Policy should reference Local Plan Policy ED2 • A decant policy for the current occupiers of 336 Brixton Road should be included
Summary of comments on other documents made available for Site 17	
Main evidence document	None
Flood risk	None
Sustainability appraisal	None

Site 18: 300-346 Norwood Road SE27

Table 16. Site 18: 300-346 Norwood Road SE27 – Summary Table

Overview	
Representation breakdown	<p>1105 respondents commenting on Site 18</p> <ul style="list-style-type: none"> ○ 1078 individuals (98%) ○ 4 Statutory Consultees (<1%): <i>Transport for London; Historic England; Greater London Authority; Environment Agency</i> ○ 1 tenants'/residents' association or group (<1%): <i>Lancaster Avenue Residents Association</i> ○ 5 community groups (<1%) <i>Friends Group for Hillside Gardens Park; Norwood Society; Friends of West Norwood Cemetery; Norwood Forum; Norwood Action Group (NAG)</i> ○ 1 Neighbourhood Planning Forum (<1%): <i>Norwood Planning Assembly</i> ○ 6 elected politicians or electoral candidates (<1%): <i>Helen Hayes MP; Saleha Jaffer and Olga FitzRoy (Candidates for St Martin's Ward); Cllrs Meldrum, Pickard and Winifred (Knight's Hill Ward); Cllrs Anna Birley, Fred Cowell, Peter Ely (Thurlow Park Ward) and Judith Cavanagh (West Dulwich ward candidate); Cllr Peter Elliott; Marina Ahmad AM</i> ○ 8 businesses (<1%), including responses from and on behalf of the following businesses within Site 18: <i>Iceland Foods Ltd; Portobello Brewery Ltd; West Norwood Service Station</i> ○ 1 Business Improvement District (<1%): <i>Station to Station BID</i> ○ 2% in broad overall support of the approach ○ <1% neutral to the approach ○ 3% providing a mix of responses ○ 94% objecting to one or more aspect of the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Non-specific support • Improved town centre/high street • Support for provision of housing • Improved public realm • Improved space for businesses • Proposals make better use of the space • Support for provision of affordable homes • Improved cycling infrastructure • Suitable location for taller buildings • Support for removal of petrol station

	<ul style="list-style-type: none"> • Support for green infrastructure improvements • Improved sustainability (general) • Transport improvements • Improved access/servicing • Positive impact on community
Summary of main points raised in objection to the proposed approach	
General	<ul style="list-style-type: none"> • Site should be removed from SADPD to enable fuller engagement with the community • Negative impact on character/visual amenity • Inadequate consultation/fuller engagement with the community required • Excessive building height • Negative impact on town centre/retail provision • Development will cause increase in traffic/air quality issues • Negative impact on businesses/loss of jobs • Negative impact on local community • Overdevelopment/too dense • Contrary to Local Plan • Negative heritage impact • Insufficient regard to net zero objectives/climate emergency • Increased parking difficulties/object to loss of car park • Against previous council commitments/2017 Masterplan • Inadequate affordable housing provision/AH not viable • Negative impact on infrastructure (general) • Negative impact on green infrastructure and biodiversity • Concerns about design/building quality • Negative daylight & sunlight impact • Negative impact on social infrastructure • Construction will cause disruption/noise • Proposals are profit-led/to benefit developers • Object to loss of existing homes • Negative impact on views • Negative impact on public transport infrastructure • Concern with specific content of DPD • Object to loss of existing buildings • Non-specific objection • Insufficient or inappropriate public realm • Incremental change needed • Negative impact on public safety/crime • Insufficient information • High rise/flats unsuitable for families • No vision for a centre fit for 2050 and beyond • Crowded/increased population density • Overlooking/loss of privacy • Loss of industrial space/inadequate provision • Concern about gentrification/rent increase • Insufficient provision for cyclists • Negative health impacts • Concerns about access/servicing

	<ul style="list-style-type: none">• Doesn't take into account post-covid lifestyle/working changes• Negative impact on disabled or older people• Negative impact on utilities infrastructure• Redevelopment/housing provision is unnecessary• Process is undemocratic• Concern about fire/building safety• Developers/buyers unlikely to be interested• Inappropriate scope of site allocation• Contrary to London Plan• Other priorities for funding/council investment• Contrary to national planning policy• Suggests alternative uses for the site• Concern about wind tunnel effect• Loss of 'All Nations Christian Centre'• No evidence that improvements for pedestrians are needed• No demand for workspace• Concern about flooding• Proposals are not driven by sustainability objectives• Add to policy wording: "Development should protect groundwater from contamination sources"																					
Summary of comments on different sections of Draft SADPD for Site 18 (relating to specific comments about wording)																						
Context	<ul style="list-style-type: none">• Flood risk section does not mention storm drains on site• No reference made to Masterplan/Manual for delivery and associated evidence• A reference to the Neighbourhood Plan should be included• The reason for including Chatsworth Way should be provided• Information about wayfinding/legibility and parking capacity should be included• Context map should show additional information (land ownership, existing businesses, current land use, planning consents, building names, landscaping and trees, densities, views, parking, pedestrian and vehicular routes)																					
Vision	<table><tr><th>Response</th><th>No. of Respondents</th><th>Percentage of Respondents</th></tr><tr><td>Negative</td><td>125</td><td>11%</td></tr><tr><td>Mostly negative</td><td>14</td><td>1%</td></tr><tr><td>Neutral</td><td>8</td><td>1%</td></tr><tr><td>Mostly positive</td><td>9</td><td>1%</td></tr><tr><td>Positive</td><td>29</td><td>3%</td></tr><tr><td>No Response</td><td>920</td><td>83%</td></tr></table>	Response	No. of Respondents	Percentage of Respondents	Negative	125	11%	Mostly negative	14	1%	Neutral	8	1%	Mostly positive	9	1%	Positive	29	3%	No Response	920	83%
Response	No. of Respondents	Percentage of Respondents																				
Negative	125	11%																				
Mostly negative	14	1%																				
Neutral	8	1%																				
Mostly positive	9	1%																				
Positive	29	3%																				
No Response	920	83%																				

	<p><i>Vision Map</i></p> <ul style="list-style-type: none"> • Vision Map should show more information (relationship with existing buildings, phasing, relationship to views and heritage assets, proposed landscaping/amenity space) • Clarification of access route to York Hill is required • Vision map should show ground levels relative to AOD levels • The heights shown are incorrect <p><i>Vision</i></p> <ul style="list-style-type: none"> • The meaning of 'fifteen minute neighbourhood' is unclear • Other terminology is unclear (public realm, permeability) • The vision should specify that buildings should look beautiful
Site Allocation Policy	<ul style="list-style-type: none"> • Requirement for air quality to be "addressed" is too weak • Affordable Housing threshold on public land should be clarified • Policy fails to identify how proposals will be delivered • Policy should refer to evidence relating to St Luke's church • There is no mention of All Nations Christian Centre • Policy incorrectly states that no significant heritage assets will be impacted • More clarity needed about what new development might bring to the area • Policy should require re-provision of the sheltered housing • Differences between types of Affordable Housing should be clarified • Reference should be made to views from York Hill estate • Reference should be made to Passivhaus/district heating systems/locally generated electricity • The policy is missing information (e.g. uses, community engagement and sustainability) • Policy should encourage alternative layouts that incorporate pedestrian routes and a finer urban grain
<p>Summary of comments on other documents made available for Site 18</p>	
Main evidence document	<ul style="list-style-type: none"> • Images of proposals/views are not adequate or are misleading • Photos of site are out of date and not representative of high street • Modelling should include Site 19 proposals to show cumulative impact • Evidence fails to consider retention of existing buildings • Image 4 has a missing map • Image 9 has an incorrect label • Royal Circus is a private garden rather than open space • Para 3.1 should include reference to all heritage assets, experience of pedestrians, retention of existing businesses

	and encouragement for start-ups, and community engagement
Flood risk	n/a
Sustainability appraisal	n/a

Site 19: Knolly's Yard SW16 (now removed from SA DPD)

Table 17. Site 19: Knolly's Yard SW16 – Summary Table

Overview	
Representation breakdown	<p>1,300 respondents commenting on Site 19:</p> <ul style="list-style-type: none"> ○ 1,277 individuals (98%) ○ 3 Statutory Consultees (<1%): <i>Transport for London, Greater London Authority, Environment Agency</i> ○ 3 tenants'/residents' associations or groups (<1%): <i>Lancaster Avenue Residents Association, Thurlow Towers Residents Association, Residents of Vale Living Retirement Village</i> ○ 6 community groups or charities (<1%): <i>Friends of Hillside Gardens Park, Norwood Society, Friends of West Norwood Cemetery, Knollys Yard Community Group, Norwood Forum, Norwood Action Group</i> ○ 1 Neighbourhood Planning Forum (<1%): <i>Norwood Planning Assembly</i> ○ 6 elected politicians or electoral candidates (<1%): <i>Helen Hayes MP for Dulwich and West Norwood (Labour), Labour & Co-operative Candidates for St Martin's Ward, Knights Hill ward councillors, Thurlow Park councillors and candidates for West Dulwich ward, Lambeth Green Group, Labour & Co-operative Assembly Member</i> ○ 2 businesses (<1%): <i>Lambeth Co-operative Development Agency, Business owner</i> ○ 1 Business Improvement District (<1%): <i>Station to Station</i> ○ 1 developers/landowners (<1%): <i>Daniel Watney on behalf of Ecoworld</i> ○ 1% in broad overall support of the approach ○ <1% neutral to the approach ○ 10% Mixed response ○ 89% objecting to one or more aspect of the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Support for provision of affordable housing • Support for provision of housing • Better use of space • Improved cycling/pedestrian infrastructure • Improved space for businesses/Support for provision of employment uses • Non-specific support • Support for urban greening/improved public realm • Improved access/connectivity • Support for car free development

	<ul style="list-style-type: none"> • Support for brownfield first approach • Support for design/layout • Policy viable • Support for height • Consistent with Local Plan • Positive impact on town centre/retail provision
Summary of main points raised in objection to the proposed approach	
General	<ul style="list-style-type: none"> • Negative impact on character/visual amenity • Site should be removed from SADPD to enable fuller engagement with the community • Excessive height • Inadequate consultation/Fuller engagement with the community required • Increase in traffic/worsening air quality • Negative daylight and sunlight impact • Negative impact on views • Increased parking difficulties • Negative impact on green infrastructure/biodiversity • Inadequate affordable housing/Site not viable for AH • Negative impact on local community • Negative impact on town centre/retail provision • Overdevelopment • Concern about loss of existing industrial provision • Overlooking/loss of privacy • Contrary to Local Plan • Concerns about access/servicing • Negative impact on infrastructure (general) • Negative impact on businesses/loss of jobs • Against previous council commitments/2017 Masterplan • Construction will cause disruption • Negative heritage impact • Concern with specific content of DPD • Insufficient regard to Net Zero objectives/Climate Emergency • Negative impact on transport infrastructure • Concerns about design/building quality • Negative impact on social infrastructure • Contrary to national planning policy • Insufficient information • Proposals are profit-led/benefit developers • Non-specific objection • Process is undemocratic • Concern about noise pollution • Crowded/increased population density • Negative impact on quality of life • Concern about pollution (general) • Suggests alternative uses for the site • Housing type is unsuitable • Negative health impacts

	<ul style="list-style-type: none">• Insufficient or inappropriate public realm• Concerns about building safety• No vision for a town centre fit for 2050 and beyond• Concern about gentrification/rent increase• Concern about loss of value/negative impact on value• Negative impact on utilities infrastructure• Concern about impact on environment (general)• Concern about flooding• Suggests alternative project to prioritise• Policy too unrestrictive/unviable• Contrary to London Plan• New development not required• Concern about subsidence• Unknown new residents• Negative impact on public safety/crime• Inadequate affordable workspace/Site not viable for AW• Concern about light pollution• Insufficient provision for cyclists• Concern about litter/refuse collection• Concern about energy efficiency																		
Summary of comments on different sections of Draft SADPD for Site 19 (relating to specific comments about wording)																			
Context	<p>The level of CIL will be higher than for other KIBAs given the limited existing floorspace to offset. Existing GIA on site is no more than 610 sqm GIA. The actual figure is likely far lower. Open yard areas comprise 8,999 sqm, or 0.9ha. Description of current site should be made more accurate and identify current challenges to development. Suggest additions to planning history.</p> <p>Statement that Tulse Hill is 950m walking distance from the site. It is in fact much closer than that, and closer than West Norwood, which is stated as 900m walking distance from it.</p>																		
Vision	<table><tr><th>Response</th><th>No. of Respondents</th><th>Percentage of Respondents</th></tr><tr><td>Negative</td><td>129</td><td>10%</td></tr><tr><td>Mostly negative</td><td>7</td><td>1%</td></tr><tr><td>Neutral</td><td>7</td><td>1%</td></tr><tr><td>Mostly positive</td><td>11</td><td>1%</td></tr><tr><td>No Response</td><td>1,139</td><td>88%</td></tr></table> <ul style="list-style-type: none">• Should reflect the ability of site to operate as a catalyst for investment and regeneration.• Vision fails to mention that the amount of industrial space will be reduced from existing 9,884 sqm to 1,500 sqm.	Response	No. of Respondents	Percentage of Respondents	Negative	129	10%	Mostly negative	7	1%	Neutral	7	1%	Mostly positive	11	1%	No Response	1,139	88%
Response	No. of Respondents	Percentage of Respondents																	
Negative	129	10%																	
Mostly negative	7	1%																	
Neutral	7	1%																	
Mostly positive	11	1%																	
No Response	1,139	88%																	
Site Allocation Policy	<ul style="list-style-type: none">• Car-free development required; need to meet the standard requirements for the protection of, and continued access to, rail infrastructure.• The provision of 1,500sqm of industrial floorspace stated in the site allocation is unacceptable and the potential for industrial re-provision on this site should be determined through a masterplan approach in line with LP2021 policy E7B and D and the Mayor’s practice note on industrial																		

	<p>intensification and co-location through Plan-led and masterplan approaches. Masterplan should address design mitigation for co-location and agent of change.</p> <ul style="list-style-type: none"> • Site allocation should incorporate the types of uses that provide essential services to the CAZ including sustainable last mile distribution/logistics, 'just-in-time' servicing among others. • Setting figures for employment floorspace and housing numbers is too restrictive and could unduly constrain development. Allocation should reflect development viability when setting parameters including floorspace, height and affordable housing. Pedestrian bridge is a benefit but is not required to bring development forward. • Sustainable construction and best practice working methods should be stipulated. • Add text "Development to protect groundwater from contamination sources".
	Summary of comments on other documents made available for Site 19
Main evidence document	<ul style="list-style-type: none"> • A statement is made that York Hill has wide footways. This may be true where York Hill meets Norwood Road but further up at the railway bridge near Knolly's Road the footway is limited to one side of the road only and even this is quite narrow. • Photos used are out of date. • Concern about accuracy of images showing proposal in context. Images and maps do not represent true impact of development. Disagree with conclusions about impact on views. • No viability evidence is provided. • The majority of the site is in PTALs 2 and 3 with the edge of the site in a PTAL 5 area. The tallest part of the development falls within PTAL areas 2 and 3. • The PTAL algorithms would mean up to 100 car parking spaces would be necessary for the development. • Location is suburban, not inner urban. • New bridge is not shown on drawn plans.
Flood risk	None
Sustainability appraisal	Disagree with or question sustainability scores of criteria 6-10.

Site 20: Tesco, 13 Acre Lane SW2

Table 18. Site 20: Tesco, 13 Acre Lane SW2 – Summary Table

Overview	
Representation breakdown	<p>65 respondents commenting on Site 20</p> <ul style="list-style-type: none"> ○ 59 individuals (91%) ○ 3 Statutory Consultees (5%): <i>Transport for London, GLA, Environment Agency</i> ○ 1 tenants'/residents' association or group (2%): <i>Residents of Baytree Road and Porden Road</i> ○ 1 community group or charity (2%): <i>Brixton Society</i> ○ 1 developers/landowner (2%): <i>Montagu Evans on behalf of HSBC</i> <ul style="list-style-type: none"> ○ 5% in broad overall support of the approach ○ 2% neutral to the approach ○ 22% providing a mix of responses ○ 72% objecting to one or more aspect of the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Support for the provision of housing • Better use of the site/car park • Support for provision of affordable housing • Support approach of focusing taller buildings on Acre Lane frontage • Support for statement that scheme should not cause unacceptable impacts to neighbours • Townscape improvements • Support for improved/re-provided supermarket • Supportive of mixed-use development • Support identification of North side of Baytree Road as sensitive neighbour • Support statement that site is not appropriate for tall buildings • Improved urban greening • Supportive of restoring acre Lane frontage • Support for ground floor active frontage • Enhanced pedestrian connectivity
Summary of main points raised in objection to the proposed approach	
General	<p>A collective response submitted by the residents of Baytree Road and Porden Road raises the following points. 26 respondents stated their support for this collective response</p> <ul style="list-style-type: none"> • Excessive massing/overbearing • Development will cause increase in traffic

	<ul style="list-style-type: none"> • Too dense/overdevelopment • Objection to access/servicing from Baytree Road • Development will cause parking issues in surrounding streets • Excessive building height • Proposals are out of keeping with the area • Buildings are too close to boundaries with Porden Road and Baytree Road • Excessive height • Overlooking/loss of privacy • Inadequate urban greening/green infrastructure • Concern with specific content of DPD/evidence <p>In addition, the following points were raised by other respondents:</p> <ul style="list-style-type: none"> • Excessive building height • Concern with specific content of DPD/evidence • Objects to access/servicing from Baytree Road • Overlooking/loss of privacy • Negative impact on daylight and sunlight • Proposals are out of keeping/negative impact on character/visual amenity • Development will cause increase in traffic • Construction will cause disruption • Inadequate affordable housing provision • Concern about overcrowding/increased density • Development will cause parking issues in surrounding streets • Inadequate consultation • Insufficient information provided • Object to loss of Tesco Car Parking • General concern about impact on neighbouring streets • Development should be car-free or provide reduced amount of parking • Building is too close to boundaries with Porden Road and Baytree Road • Excessive massing/overbearing • Development will lead to air quality issues/pollution • Inadequate urban greening/green infrastructure • Concern about loss of supermarket/jobs • Concern about building design/quality • Too dense/overdevelopment • Parking provision contrary to London Plan/Local Plan • Houses for families are needed rather than flats • Negative impact on heritage • Concern that commercial unit will be a bar/restaurant leading to noise/anti-social behaviour • Negative impact on views • Concern that access to Baytree Road from Brixton Hill will be reinstated • Tesco should provide public toilets • Increased Noise pollution • Impact on 41-45 Acre Lane not taken into account • No demand for additional commercial unit/needs justification
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	<ul style="list-style-type: none">• Suggests alternative layout/uses• Objects to provision of housing• Trees have not been considered• Risk of overcrowding pavement at entrance to Tesco• Concern about maintenance of public realm/landscaping• Concern that underground parking will mean ventilation system that will cause noise/pollution;• Council should not be funding supermarket• Negative wind/microclimate effects• Negative impact on security for residents of Baytree and Porden Road• Object to residential units fronting onto Acre lane at ground floor• Concern about insulation/energy efficiency• Proposed scheme is unsuitable for the site• Buildings should be refurbished not demolished•																					
Summary of comments on different sections of Draft SADPD for Site 20 (relating to specific comments about wording)																						
Context	<p><i>Context</i></p> <ul style="list-style-type: none">• Add wording to clarify that only two of the three trees covered by the TPO still exist• The site is incorrectly stated as not being in an Air Quality Focus Area <p><i>Context Map</i></p> <ul style="list-style-type: none">• The site boundary line is incorrect adjoining Baytree Road• The southern side of Baytree Road should be identified as sensitive neighbour.• The Site entry/exit should be shown onto Acre Lane rather than Baytree Road;• Map should show trees to be retained.• A wider catchment for sensitive neighbours should be shown																					
Vision	<table><tr><th>Response</th><th>No. of Respondents</th><th>Percentage of Respondents</th></tr><tr><td>Negative</td><td>20</td><td>31%</td></tr><tr><td>Mostly negative</td><td>7</td><td>11%</td></tr><tr><td>Neutral</td><td>9</td><td>14%</td></tr><tr><td>Mostly positive</td><td>9</td><td>14%</td></tr><tr><td>Positive</td><td>12</td><td>18%</td></tr><tr><td>No response</td><td>8</td><td>12%</td></tr></table> <ul style="list-style-type: none">• The wording around "potential" for urban greening is too vague• There is no consideration of new development at 41-45 Acre Lane	Response	No. of Respondents	Percentage of Respondents	Negative	20	31%	Mostly negative	7	11%	Neutral	9	14%	Mostly positive	9	14%	Positive	12	18%	No response	8	12%
Response	No. of Respondents	Percentage of Respondents																				
Negative	20	31%																				
Mostly negative	7	11%																				
Neutral	9	14%																				
Mostly positive	9	14%																				
Positive	12	18%																				
No response	8	12%																				
Site Allocation Policy	<ul style="list-style-type: none">• The site has potential to accommodation 420-470 residential units based on their feasibility work• Inadequate provision for cyclists/requirements should be more clearly defined																					

	<ul style="list-style-type: none"> • Add wording: “The provision of active frontages with ground floor town centre uses will be encouraged along Acre Lane (including Use Class E and Sui Generis uses).” • Clarification that 35% Affordable Housing threshold is subject to viability • Edit to Heritage Assets section: “Development <u>will be supported where it can be demonstrated that it minimises and seeks to avoid</u> should cause no harm” • Additional wording in Building Heights section: “The site is not appropriate for a tall building development, defined by Local Plan Policy Q26 as above 45m in this location. Should tall buildings be proposed, they would be subject to addressing Local Plan Policy Q26 parts A and B and London Plan Policy D9.” • Edits to wording in Transport section: “A replacement supermarket of equivalent net sales area to the existing store is expected to need <u>will require</u> an appropriate level of parking to operate effectively. <u>Car parking provision for a replacement supermarket should not exceed 150 car parking spaces.</u> Car parking provision should This would secure a meaningful reduction of approximately 80 parking spaces from the existing quantum and contribute toward in order to <u>achieving</u> key Local Plan • Edits to wording in Transport section: <u>The location of the servicing access of to the replacement supermarket should be accessed from Baytree Road rather than from Acre Lane will be subject to the detailed design of any future development proposals and an assessment of the potential impacts on the surrounding highways network.</u> Future development proposals should seek to reduce vehicular cross-overs at Acre Lane should be minimised to maximise pedestrian flow to and from the town centre. • Edits to Residential amenity section: “Residential accommodation should meet <u>seek to achieve</u> all relevant internal and external amenity standards” • Edits to Open Space section: Development should address existing open space deficiency and access to nature deficiency by <u>seeking to</u> meeting the requirements of Local Plan Policy EN1(d). • Brixton Society - EV charging points should be provided • The policy should specify maximum capacities and heights • Windows/balconies should be minimised on the southern elevation to avoid overlooking; • Supermarket unloading/back of house area should be enclosed to avoid noise; • Developments should submit a sustainability statement and meet guidelines and targets on sustainable construction • It is unclear if stated heights include supermarket or just the residential element; • Car parking provision in this location should be kept to a minimum focusing on the need for disabled bays and space
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	<p>should be used for activities that create vibrancy and contribute to the formation of liveable neighbourhoods.</p> <ul style="list-style-type: none"> • Neighbour relationships section should reflect wording of Policy Q2 and protect visual amenity and outlook • Applicants should be required to submit the following documents: <ul style="list-style-type: none"> - Daylight & Sunlight Assessment - Servicing Management Plan - Transport Statement and Travel Plan - Sustainability statement
Summary of comments on other documents made available for Site 20	
Main evidence document	No view of indicative approach as shown from Porden road/Baytree road
Flood risk	None
Sustainability appraisal	The Sustainability Appraisal exaggerates the positive impacts of development

Site 21: 51-65 Effra Road SW2

Table 19. Site 21: 51-65 Effra Road SW2 – Summary Table

Overview	
Respondent breakdown	<p>53 respondents commented on Site 21, of which:</p> <ul style="list-style-type: none"> ○ 42 individuals (78%) ○ 3 Statutory Consultees (6%): <i>Transport for London, Greater London Authority, Environment Agency</i> ○ 2 Community groups or charities (4%): <i>Mosaic Clubhouse, Brixton Society</i> ○ 4 elected politicians or electoral candidate (8%): <i>Lambeth Cllr, Knights Hill ward councillors, Tulse Hill ward councillor, Helen Hayes MP for Dulwich and West Norwood (Labour)</i> ○ 2 developers/landowner (4%): <i>Brixton Unitarian Church, Agent on behalf of LPPI Real Estate Fund</i> ○ 8% in broad overall support of the approach ○ 0% neutral to the approach ○ 15% providing a mix of responses ○ 77% objecting to the overall approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Principle of new housing supported • Support retention/enhancement of Rush Common/more green space

	<ul style="list-style-type: none">• Welcome replacement of out-of-town retail• Support that site not appropriate for tall buildings• Support principle of mixed-use redevelopment• Non-specific support for proposed approach• Support for furthering aims of CEZ/inclusion of light industrial space• Support for car free/pedestrianised approach• Support for new affordable housing															
Summary of main points raised in objection to the proposed approach																
General	<ul style="list-style-type: none">• Remove Mosaic Clubhouse from site boundary/no justification/current building fit for purpose/highly valued facility• Concern about loss of daylight and/or sunlight and/or outlook and/or privacy to nearby residential properties• Leave as it is/too much development already/not needed/area over-crowded• Too tall• Retain the Unitarian Church/adverse impact on church/current building fit for purpose• Opposed to loss of existing retail uses/current retail uses valued• Concern about impact of construction on traffic and/or noise and/or air pollution• Negative impact on traffic levels/road infrastructure• Fitch Court should only be proposed for redevelopment when replacement homes built and residents rehoused• Include affordable workspace• Proposal not in the interests of the people of Lambeth• Affordable housing will not be affordable to people in Brixton• Concern that the Council intends to compulsorily purchase the Church• Failure of the Council to engage effectively with the Church about redevelopment options• There should be no reduction in affordable housing on the site as a result of the Fitch Court move• Strongly opposed to an arbitrary limit on height• Concern about effect of new development on climate change• Don't fund places of worship• Council should not profit from selling its land• Concern about loss of greenery/established trees															
Summary of comments on different sections of Draft SADPD for Site 21 (relating to specific comments about wording)																
Context	n/a															
Vision	<table><tr><th>Response</th><th>No. of Respondents</th><th>Percentage of Respondents</th></tr><tr><td>Negative</td><td>10</td><td>19%</td></tr><tr><td>Mostly negative</td><td>1</td><td>2%</td></tr><tr><td>Neutral</td><td>5</td><td>9%</td></tr><tr><td>Mostly positive</td><td>5</td><td>9%</td></tr></table>	Response	No. of Respondents	Percentage of Respondents	Negative	10	19%	Mostly negative	1	2%	Neutral	5	9%	Mostly positive	5	9%
Response	No. of Respondents	Percentage of Respondents														
Negative	10	19%														
Mostly negative	1	2%														
Neutral	5	9%														
Mostly positive	5	9%														

	Positive	6	11%
	No response	26	49%
	<ul style="list-style-type: none"> • Strongly support the vision • Not clear how much housing is proposed • Needs to be in keeping with architecture of the local area • Need significant improvements to Brixton public realm • Make clear development should be car free other than for people with disabilities • Meaningless buzzwords • Support vision for their land - mixed use residential and employment 		
Site Allocation Policy	<ul style="list-style-type: none"> • Need to address more specifically the impact on/relationship with Masey Mews • Access road should not be open to through traffic/redesign access route/safety concern • Height and density of new housing must be in keeping with surroundings • Building heights fronting Effra Road should not exceed 5 storeys/Eurolink height • Maintain separate access to Masey Mews for existing residents • Support for light industrial workspace (in CEZ) but include affordable space • Identify houses north of Eurolink centre as sensitive residential area • Site has no relationship to Rush Common/remove reference • Greenspaces should be private to avoid anti-social noise • Maximise biodiversity net gain • Relocate deliveries to dedicated CPZ space in adjoining streets, to reduce car use • Protect groundwater from contamination sources • Make clear that area can suffer from significant car traffic congestion but has much cycling infrastructure • No mention of Council owned land between site, Masey Mews and Dalberg Road - provides essential buffer/stag beetle habitat • Car park is on lower level than Masey Mews gardens • Any redevelopment should minimise impacts on the bus lanes and bus stands on Effra Road, including during construction • Should be at least 40% social rented housing • 13m on eastern boundary is excessive/should be 3 storeys maximum • Need on-site servicing and delivery bays • Include restrictions to prevent change of use from new workspace • Should be 50% affordable housing across whole site • Residents of Fitch Court should be compensated for inconvenience and distress caused • Require contributions towards extending cycle hire provision along Effra Road • Require contributions towards road safety improvements • Require contributions towards bus stop improvements on Effra Road 		

	<ul style="list-style-type: none"> • Require contributions towards increased health and education services in the area • Require contributions towards improvement and maintenance of Trinity Congregational Chapel and churchyard • Strengthen requirement for amenity and play on site, not on nearby spaces • Improvements to Rush Common should be made with involvement of Friends of group, address anti-social behaviour and contribute to St Matthews rain garden project • If Mosaic Clubhouse site stays in, protection needs to be stronger in policy wording • Remove word 'new' from green space and trees and Rush Common already exists • Include specific acknowledgement that parcels within the allocation can come forward independently of one another; and with no inter-dependency on land use: applications to be assessed on case-by-case basis. • Employment uses should not be restricted by demographic/sector • Remove the height limit • Scheme viability should be considered at application stage • Include family sized housing
Summary of comments on other documents made available for Site 21	
Main evidence document	<ul style="list-style-type: none"> • Views from Brixton Water Lane Conservation Area need to be tested • Place residential buildings perpendicular to main road for health reasons • Consider heritage impact on former Synagogue • Include site-specific environmental impact assessment
Flood risk	n/a
Sustainability appraisal	<ul style="list-style-type: none"> • Require planning obligations that secure net improvement in surface water runoff

Site 22: 1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24

Table 20. Site 22: 1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE 24 – Summary Table

Overview	
Respondent breakdown	<p>24 respondents commenting on Site 22:</p> <ul style="list-style-type: none"> ○ 17 individuals (71%) ○ 3 Statutory Consultees (13%): <i>Transport for London, Greater London Authority, Environment Agency</i>

	<ul style="list-style-type: none"> ○ 2 Community groups or charities (8%): <i>Herne Hill Society, Brixton Society</i> ○ 1 elected politician or electoral candidate (4%): <i>Helen Hayes MP for Dulwich and West Norwood (Labour)</i> ○ 1 developer/landowner (4%): <i>DP9 on behalf of Leos International</i> ○ 0% in broad overall support of the approach ○ 13% neutral to the approach ○ 13% providing a mix of responses ○ 75% objecting to one or more aspect of the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Support for provision of employment uses • Support for car free development • Improved pedestrian access • Non-specific support • Transport improvements • Suitable location for taller buildings • Support for provision of housing
Summary of main points raised in objection to the proposed approach	
General	<ul style="list-style-type: none"> • Excessive building height • Concern with specific content of DPD • Negative impact on character/visual amenity • Negative impact on transport infrastructure • Negative daylight & sunlight Impact • Negative impact on green infrastructure and biodiversity • Negative impact on views • Overlooking/loss of privacy • Overdevelopment/too dense • Loss of boxing club • Concerns about access/servicing • Inappropriate scope of site allocation • Concern about noise pollution • Inadequate consultation/Fuller engagement with the community required • Proposed uses are incompatible • Should further restrict parking • Negative impact on social infrastructure • Insufficient information • Concern about gentrification/rent increase • Need to have regard to rail infrastructure and should provide platforms on Overground line • Negative heritage impact • Policy should be less specific about quantum and height of development

	<ul style="list-style-type: none"> • Insufficient provision for cyclists and pedestrians • Concerns about design/building quality • Negative impact on infrastructure (general) • Suggest alternative uses for the site - green space and facilities such as shops, plus a workshop type area for creative industries • Negative impact on businesses • Site should be a landmark and gateway • Concern about fire/building safety • Concern about pedestrian route • Inadequate affordable housing provision
Summary of comments on different sections of Draft SADPD for Site 22 (relating to specific comments about wording)	
Context	<p>(All from individuals)</p> <ul style="list-style-type: none"> • Site area is understated; the area within the red line is 0.35ha. Site should be larger to ensure a comprehensive approach. • The “Hardess Yard” map pin is erroneously located in the back gardens of Nos. 9 to 21 (odd) Wanless Road. • Land ownership is both private and public. • Wyck Gardens is northwest from the site, not northeast. • Planning history of 19/04280/FUL should reflect the published description of development. • Should identify the key desirable and valuable characteristics of the area including the industrial heritage, railways, yards, and demographics. • Changes suggested to description of current site character. • Detailed comments made about heritage, views, neighbouring uses and access arrangements.
Vision	Response No. of Respondents Percentage of Respondents
	Negative 2 8%
	Mostly negative 3 13%
	Neutral 6 25%
	Mostly positive 0 0%
	Positive 2 8%
	No response 11 46%
	<p>(All from individuals)</p> <ul style="list-style-type: none"> • No indication of the status of new Hardess Street through the site - is this a new road, or is it only a pedestrian/cycle road? • Should clearly set the desired townscape and placemaking outcomes for the site. • Map should include an indicative range of heights rather than being prescriptive.
Site Allocation Policy	<ul style="list-style-type: none"> • Clarification sought on points relating to acceptable land uses, affordable housing viability appraisals, impacts to identified heritage assets and views and the role of tall buildings in townscape.

	<ul style="list-style-type: none"> • Should clarify that 1,400 sqm of light industrial workspace is not necessarily a minimum requirement of industrial floorspace, rather the threshold for whether development would constitute a net loss of industrial floorspace, and therefore which affordable housing threshold would need to be met to qualify for the Fast Track Route. • Should not necessarily quantify housing numbers, provided that all units achieve acceptable living standards internally and externally, and that the proposals are more widely considered acceptable in planning terms. • Need to justify stated building height; Higgs Yard should not be seen as a policy reference for the maximum height achievable. • Policy should reflect London Plan Policies E3 and E7C and incorporate the need to provide essential services to the CAZ. • Should make it clear that the 50% affordable housing threshold only applies to the land which is considered to be 'public land' for the purposes of the Mayor's threshold approach and not the land in private ownership where the 35% threshold will apply.
Summary of comments on other documents made available for Site 22	
Main evidence document	<p>(All from individuals)</p> <ul style="list-style-type: none"> • Indicative model has the relative heights of the tall buildings reversed with the great height placed closest to the more sensitive receptors in Wanless Road. • Inconsistencies between various site maps and road names. • There is a tree in Wellfit Street (document says there are none).
Flood risk	None
Sustainability appraisal	None

Site 23: Land at corner of Coldharbour Lane and Herne Hill Road SE24

Table 21. Site 23: Land at corner of Coldharbour Lane and Herne Hill Road SE24 – Summary Table

Overview	
Respondent breakdown	<p>17 respondents commenting on Site 23</p> <ul style="list-style-type: none"> ○ 11 individuals (65%) ○ 2 Statutory Consultees (12%): <i>Transport for London; Environment Agency</i> ○ 2 Community groups or charities (12%): <i>Herne Hill Society, Brixton Society</i>

	<ul style="list-style-type: none"> ○ 1 elected politician or electoral candidate (6%): <i>Helen Hayes MP for Dulwich and West Norwood (Labour)</i> ○ 1 Infrastructure provider (6%): <i>Avison Young on behalf of National Grid</i> ○ 22% in broad overall support of the approach ○ 44% neutral to the approach ○ 22% providing a mix of responses ○ 11% objecting to one or more aspect of the approach
Summary of main points made in support of the proposed approach	
General	<ul style="list-style-type: none"> • Support widened footway • Support for car free development • Support active frontage • Improved pedestrian access alongside railway • Transport improvements • Support retention of existing uses • Suitable location for taller buildings • Scope to improve public realm
Summary of main points raised in objection to the proposed approach	
General	<ul style="list-style-type: none"> • Excessive building height • Negative impact on character/visual amenity • Overdevelopment • Should retain church use • Church and residential uses are incompatible • Need to improve access to railway station • Negative impact on views • Negative impact on transport infrastructure • Site is not a town centre • Need transport contributions • Need to have regard to rail infrastructure • Concern about noise pollution • Employment and residential uses are incompatible • Need parking for church • Concern with specific content of DPD • Need to have regard to underground electricity cable • Insufficient provision for cyclists • Negative impact on social infrastructure • Negative impact on infrastructure (general) • Suggest alternative use for the site • Insufficient information • Concerns about access/servicing • Overlooking/loss of privacy • Concerns about design/building quality

Summary of comments on different sections of Draft SADPD for Site 23 (relating to specific comments about wording)	
Context	None
Vision	Response No. of Respondents Percentage of Respondents
	Negative 0 0%
	Mostly negative 2 12%
	Neutral 3 18%
	Mostly positive 1 6%
	Positive 1 6%
	No response 10 59%
Site Allocation Policy	<ul style="list-style-type: none"> This would require a car free development. Contributions towards active travel connections, cycle hire provision and Loughborough Junction station may be appropriate. The site is adjacent to tracks used by National Rail services and so any proposed development will need to meet the standard requirements for the protection of, and continued access to, rail infrastructure. Request to add text: "A strategy for responding to the National Grid electricity assets present within the site is required which demonstrates the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the asset has been reduced through good design."
Summary of comments on other documents made available for Site 23	
Main evidence document	None
Flood risk	None
Sustainability appraisal	Question statement on p.123 that that the proposal would positively influence the townscape and acknowledge neighbour relations.

Site 24: King's College Hospital, Denmark Hill SE5

Table 22. Site 24: King's College Hospital, Denmark Hill SE5 – Summary Table

Overview		
Representation breakdown	9 respondents commenting on Site 24: <ul style="list-style-type: none">○ 4 individuals (44%)○ 3 Statutory Consultees (33%): <i>Transport for London, Greater London Authority, Environment Agency</i>○ 1 elected politicians or electoral candidate (11%): <i>Helen Hayes MP for Dulwich and West Norwood (Labour)</i>○ 1 developers/landowner (11%): <i>ID Planning on behalf of King’s College Hospital Foundation Trust</i>○ 22% in broad overall support of the approach○ 44% neutral to the approach○ 22% providing a mix of responses○ 11% objecting to one or more aspect of the approach	
Summary of main points made in support of the proposed approach		
General	<ul style="list-style-type: none">• Support in principle for the draft allocation	
Summary of main points raised in objection to the proposed approach		
General	<ul style="list-style-type: none">• Comments relate to detail – see below	
Summary of comments on different sections of Draft SADPD for Site 24 (relating to specific comments about wording)		
Context	n/a	
Vision	Response	No. of Respondents Percentage of Respondents
	Negative	1 11%
	Mostly negative	0 0%
	Neutral	0 0%
	Mostly positive	1 11%
	Positive	1 11%
	No Response	6 67%
	<ul style="list-style-type: none">• General support for the vision• Opportunity to create vertical interest, connectivity with train station and to widen main roads	

Site Allocation Policy	<ul style="list-style-type: none"> • 24-hour pedestrian access through the site from Coldharbour Lane to Denmark Hill should be maintained • Add protection of groundwater from contamination sources • Any intention to redevelop the part of the site that is within a KIBA would need to be carried out as part of a masterplan for the entire industrial estate in accordance with LP E7B and Mayor's practice note • Expect a substantial reduction in on site car parking. Contributions towards active travel connections, cycle hire provision and Denmark Hill station may be appropriate. • Site is adjacent to tracks used by London Overground services to any proposed development will need to meet standard requirements for protection of and continued access to rail infrastructure. • Land use policy wording should be amended to support a mix of uses at the Business Park as part of the wider strategy to secure capital receipts to fund improvements to the hospital. • The requirement to provide 'generous' areas of public realm is unduly onerous given need to optimise provision of healthcare facilities – remove the word 'generous' • Requirement to address open space deficiency and access to nature deficiency is onerous – make clear that an off-site contribution would be sought, subject to financial viability
Summary of comments on other documents made available for Site 24	
Main evidence document	n/a
Flood risk	n/a
Sustainability appraisal	Strong support for zero private car parking on the site to discourage motor vehicle movement in local area. All ability access transport drop-off only. Increase walking and cycling permeability through the site and increase cycle parking for staff and visitors.

APPENDIX A - LAMBETH SITE ALLOCATIONS DPD - CONSULTATION AND ENGAGEMENT PLAN

A.1. Introduction

A.1.1. This consultation and engagement plan sets out the methods that will be used to publicise and consult on the Draft Site Allocations Development Plan Document (Draft SADPD).

A.1.2. This consultation is an opportunity for stakeholders to comment on the emerging draft site allocation policies and associated evidence and sustainability appraisal, in accordance with the Town and Country Planning (Local Planning)(England) Regulations 2012 and Lambeth's Statement of Community Involvement 2020.

A.2. Stakeholders

A.2.1. The key stakeholders for the consultation are:

- Those who live, work and carry out business in Lambeth
- Tenants and leaseholders
- Residents' associations
- Community and voluntary groups
- Elected politicians
- Neighbourhood planning groups (existing and emerging)
- Business Improvement Districts (BIDs) and business networks
- Developers and landowners (and their representatives)
- Registered providers of affordable housing
- Infrastructure providers (such as transport, health service)
- Statutory consultees such as the Mayor of London, other London boroughs, Historic England, Environment Agency, Natural England

A.3. Consultation methods

Primary method

- A.3.1. The primary method for seeking stakeholders' views at Regulation 18 consultation will be Commonplace, a digital consultation platform used by the Council. This is designed to be easy to access on smartphones and tablets.
- A.3.2. The Commonplace platform for the Draft SADPD will present an overview of the sites in map form, allowing stakeholders to select the site(s) they are interested in rather than reading through lengthy documents. Details of each site will be provided individually, including an aerial photograph and its boundary. Stakeholders will be able to read the vision for the site along with maps showing the context and proposed approach, plus the draft policy wording. There will be links to relevant sections of the supporting evidence and to the sustainability appraisal for that site.
- A.3.3. There will be a concise explanation of the background to the Draft SADPD and the process that will be followed. It will set out what people are being asked to comment on in this round of consultation, how the results of the consultation will be considered and reported and the next steps in the process for preparing the Draft SADPD.
- A.3.4. The introductory material for the consultation will be written as far as possible in plain English, avoiding technical jargon wherever possible. However, it should be noted that it is necessary in the draft policies and supporting evidence to use some technical language (in relation to flood risk levels or categorisation of heritage assets, for example) in order to convey the correct meaning in a statutory planning context.
- A.3.5. Consultation questions will invite responses on the content of the Draft SADPD and on the proposed approach to each site. If someone does not wish to respond using Commonplace, they can send their comments in writing by email or by post. All responses received will be considered equally, irrespective of the medium used.
- A.3.6. A link to the Commonplace site will also be provided via a consultation page on the Council's website.

Supplementary methods

- A.3.7. The following supplementary methods will be used to gather the views and comments of stakeholders:

Table A.1: Supplementary methods

Supplementary methods
A briefing for ward councillors (for current wards within which proposed sites are located) before the start of the consultation, providing them with the information they need to help people understand what the consultation is about and support them in responding.
Meetings during the consultation with designated neighbourhood planning forums, local groups/partnerships and Business Improvement Districts covering the areas in which the proposed sites are located. This is likely to be organised for groups of sites in different parts of the borough (e.g. Waterloo, Brixton, Loughborough Junction, West Norwood)
A presentation to the Lambeth Housing Partnership
A presentation to the Lambeth Staying Healthy Partnership Board
A presentation to the Lambeth Safer Spaces working group
A workshop with representatives of disability groups in the borough
A workshop with young people
Meetings before or during consultation with the GLA, relevant neighbouring boroughs and Historic England
Meetings before or during consultation with key landowners affected by the proposed site allocations

A.4. Publicity and dissemination

A.4.1. A range of methods will be used to raise awareness about the consultation and encourage people to respond, with the objective of raising awareness among the full range of stakeholders, including those who are characterised as groups with whom the council has struggled to engage (see section on equalities below).

A.4.2. In addition to more traditional publicity methods, ward councillors, community groups and networks will be encouraged to raise awareness about the consultation through word of mouth and ‘cascading’ amongst their constituents and members.

A.4.3. The following publicity and dissemination methods will be used:

- An email to all those on the Council’s planning policy consultation database (some 2,050 contacts which includes the statutory, specific and general consultation bodies required by the Regulations). This will include contacts for landowners and their representatives, for the proposed sites.
- The Council’s social media channels including Facebook and Twitter
- Promotion through Love Lambeth and Lambeth Talk
- Press release
- A request to neighbourhood planning groups, Business Improvement Districts and other local community forums to disseminate to their members.

- Promotion through existing bulletins and networks (such as Lambeth Forum Network, public health networks, cycling and walking networks, , Lambeth 500, Lambeth Housing Partnership, BIDs, creative and digital industries advisory groups, Healthy Streets Forum, LGBT+ networks, disability networks, Climate Change and Biodiversity newsletters the youth and play e-bulletin, the Lambeth Schools Partnership newsletter, Lambeth Youth Council, Integrate's email bulletin to community and voluntary groups, an email to those who have signed up to be notified about current consultations, and the Community Round Up email).
- Use of internal communications channels to inform and engage staff

A.4.4. The Commonplace digital engagement platform allows real-time analysis of respondents by demographic characteristics (subject to this information being provided by respondents). We will review the demographic information at key points in the consultation and look to increase take up by under-represented groups.

A.5. Equalities

A.5.1. *To assess potential equalities impacts of the consultation approach, the key stakeholder groups for the consultation have been assessed against three levels of engagement; 'active'; 'aware and potentially active'; and 'groups with whom the council has struggled to engage'. The assessment is set out in the stakeholder mapping table below. This mapping exercise has helped to identify the consultation and publicity methods listed in the right-hand column of the table.*

Table A.2: Site Allocation DPD consultation - stakeholder mapping

Audience characteristic	Audience attributes	Stakeholder	Consultation/publicity method
Active	<ul style="list-style-type: none"> • Likely to be identified consultees (general, specific or other) • Established interest in planning and regeneration issues • Likely to be members of community organisations • Have a sense of 	<ul style="list-style-type: none"> • Politicians • Neighbourhood planning groups • Interest groups e.g. Lambeth 500 • Developers and landowners • Registered providers of affordable housing • Infrastructure and service providers 	<ul style="list-style-type: none"> • Notification by email and through bulletins/networks • Briefing for ward councillors • Individual meetings with neighbourhood planning groups and BIDs • Presentation to Lambeth Housing Partnership

Audience characteristic	Audience attributes	Stakeholder	Consultation/publicity method
	<ul style="list-style-type: none"> belonging to their neighbourhood Follow and/or are aware of various council initiatives 	<ul style="list-style-type: none"> Statutory consultees 	<ul style="list-style-type: none"> Meetings with statutory consultees and service providers
Aware and potentially active	<ul style="list-style-type: none"> Likely to read newsletters, council website, tweets etc Easy to inform but not so easy to involve – maybe don't have the time or we don't provide the right opportunity Might engage if we are in the right place or offer the right forum Limited knowledge of planning and regeneration issues Might rally around a single issue 	<ul style="list-style-type: none"> Tenants' and Residents' Associations Community and voluntary groups Special interest groups or networks Businesses and business networks 	<ul style="list-style-type: none"> Notification by email and through bulletins/networks Promotion in council publications Promotion by ward councillors
Groups with whom the council has struggled to engage	<ul style="list-style-type: none"> Don't really read the literature that the council sends Think that what the council says doesn't really affect them Limited knowledge of planning and regeneration issues May not speak English as a first language May not feel they have much of a stake in their local community (e.g. young people, just moved into the area) 	<ul style="list-style-type: none"> Residents not involved in groups or networks Those in more disadvantaged socio-economic groups Some older people Some young people Some disabled people Some black and minority ethnic groups 	<ul style="list-style-type: none"> Promotion by ward councillors Use of social media channels Publicity through the Youth Council and bulletins targeting young people Meeting with groups representing people with disabilities and young people All consultation material to include detail of support available in libraries

A.5.2. An Equalities Impact Assessment (EIA) of this consultation and engagement plan has been carried out alongside the EIA of the Draft SADPD itself.

A.5.3. Those responding through Commonplace will be asked to complete optional questions about their demographic characteristics. This will enable analysis of the consultation findings by stakeholder group and protected characteristic, where relevant.

A.6. Reporting and feedback

A.6.1. Analysis of the results will inform the revisions to the Draft SADPD, which will then be the subject of a second round of consultation (known as 'Regulation 19' pre-submission publication) prior to submission for examination. The results of the first round of consultation will be presented in a consultation report, which will be made available to inform a decision about whether to proceed with pre-submission publication. It will be published on-line. The material presented in the second round of consultation will include a summary setting out what people said during round one and how this was used to inform the content of round two (alongside other factors such as evidence and national/regional/local policy requirements).

APPENDIX B - EQUALITY IMPACT ASSESSMENT PRO FORMA

Author: Vanessa Rodgers	Extension:
Directorate Neighbourhoods and Growth	Department/Division Growth, Planning and Employment / Planning, Transport and Development

Draft Site Allocations Development Plan Document

Q1. What is changing?

What is the most significant or key change taking place? Can you indicate the type of change in your response (e.g. policy/decision/strategy/ service/procedural/ geographic/procurement etc.) so it is clear what is being equalities assessed? Why is this change happening? What do you aim to achieve? Can you clearly indicate what decision-makers are being asked to take a decision on?

- B.1.1. The Site Allocations Development Plan Document (SADPD) will be part of the statutory development plan for Lambeth, alongside the Lambeth Local Plan 2021, the London Plan 2021 and South Bank and Waterloo Neighbourhood Plan 2019. It will therefore be part of the suite of policy documents that help deliver sustainable growth and investment in Lambeth, along with the revised CIL Charging Schedule and emerging supplementary planning documents. It will support implementation of wider Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and emerging Climate Action Plan.
- B.1.2. The SADPD will add site-specific policies to those already in the Lambeth Local Plan 2021. The principal objective of the SADPD is to unlock investment on these sites through the mechanism of site-specific planning policy.
- B.1.3. The Draft SADPD at Appendix 1 of this report includes emerging site allocation policies for fourteen sites, distributed across the borough. All have potential to deliver housing alongside commercial uses, apart from two that relate to hospital campuses. Of these fourteen sites, three have existing allocations in the Lambeth Local Plan 2021 (Royal Street (Site 1), Gabriel's/Princes Wharf (Site 9) and Norwood Road (Site 18)). These existing allocations will be superseded on adoption of the SADPD. The other existing allocations within the Local Plan 2021 will be unaffected by the SADPD and will remain

as they are. The numbering of the proposed allocations in the Draft SADPD is designed to work alongside the numbering of the existing allocations in the Local Plan 2021.

B.1.4. Sites are included in the Draft SADPD for one or more of the following reasons:

- to set clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver;
- to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies;
- to articulate the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships;
- to persuade landowners to consider the potential for optimising the development capacity of their land and help deliver key place-making objectives, where they might otherwise be uncertain about what would be supported;
- to signal some additional sites as appropriate for tall buildings, outside the locations already identified in the Local Plan;
- to enable key strategic infrastructure to come forward in a timely way.

B.1.5. It is not necessary, or recommended, to have a site-specific allocation for every potential development site in the borough. Many larger sites can and do come forward successfully without such a policy, with sustainable development achieved through application of the borough-wide and neighbourhood-level policies in the development plan as a whole. There is also no need in Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the revised Lambeth Local Plan. However, the new site allocation policies will help to accelerate delivery of housing in the borough, maintain the necessary pipeline of new housing and thereby ensure housing delivery targets continue to be achieved. They will also enable the timely renewal and optimisation of social infrastructure and commercial floorspace.

B.1.6. The guiding approach in developing the draft site allocation policies is design-led optimisation of development capacity, as required by London Plan policy. This has involved analysis of the optimum mass and height that can be achieved, having regard to all planning constraints relevant to that site, including impacts on neighbouring uses, views, townscape and heritage assets. Key spatial objectives have been factored in and identified, such as opportunities to contribute to strategic place-making – for

example the Central Activities Zone and potential for an SC1 life-sciences/innovation district, South Bank creative and cultural quarter, town centres, or the growing cluster of flexible workspace in West Norwood/Tulse Hill. Other objectives addressed include improvement in movement and permeability, healthy routes and active travel, townscape, public realm, community safety and urban greening. Consideration of viability has informed indicative development quantum and the expectations around delivery of affordable housing and affordable workspace (where relevant).

- B.1.7. Existing development plan standards for housing quality, amenity space, parking, urban greening and zero carbon will apply to these sites, but the ambition for exemplary approaches in meeting these standards has been signalled in the Draft SADPD. Where possible, additional site-specific guidance has been included on matters such as flood risk mitigation and air quality. The aspiration for key public benefits is also signalled, such as employment and skills contributions tailored to particular growth sectors.

Q1.b Who will be involved in approving this decision?

Cabinet

Q2. What do we know about the people who will be impacted by this change?

What does your information tell you about the people who will be affected by this change? Are protected groups impacted? What information do you hold on the protected characteristics of the people affected by the change? (Age, disability, gender reassignment, pregnancy and maternity, race/ethnicity, religion or belief, gender, sexual orientation, health, socio-economic, language) Are there any gaps or missing information?

- B.1.8. The proposed site allocations affect the following wards: Bishop's, Prince's, Herne Hill, Ferndale, Brixton Hill, Coldharbour, Streatham Wells, Knight's Hill and Streatham Wells. Wards such as Ferndale, Coldharbour, Prince's and Bishop's are also some of the most deprived parts of Lambeth, which is one of the most deprived areas of the country according to the IMD therefore efforts will need to capture groups from a variety of backgrounds and those with protected characteristics in these areas in particular.

- B.1.9. Demographic data on these wards can be found in the [State of the Ward](#) report.

- B.1.10. Key stakeholders for the Draft SA DPD are:

- Those who live, work and carry out business in Lambeth, particularly those on or surrounding the 14 proposed sites
- Tenants and leaseholders of the proposed 14 sites and surrounding areas. Three of these sites have existing residents: Royal Street (Site 1), Norwood Road (Site 18) and Effra Road (Site 21).

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Table B.1: Sites with existing residents affected by redevelopment

Royal Street (Site 1)	<ul style="list-style-type: none"> • 77 self-contained market units in Canterbury House • 52 self-contained market units in Stangate House
Norwood Road (Site 18)	<ul style="list-style-type: none"> • 80 residential units <ul style="list-style-type: none"> ○ Snowe House (12 affordable units) ○ Thanet House (12 units, 9 affordable) ○ 8-12 Lansdowne Hill (12 affordable units) ○ Residential above Knowles of Norwood (19 units) ○ Residential above shops between 328-362 Norwood Road (24 units) ○ 2 Lansdowne Hill (1 unit)
Effra Road (Site 21)	<ul style="list-style-type: none"> • 35 self-contained residential units (affordable sheltered housing) at Fitch Court – to be re-provided as part of nearby Somerleyton Road development • 2 self-contained residential units (market owned and let by the Church)

- Residents' associations affected by redevelopment of any of the proposed 14 sites
- Community and voluntary groups affected by redevelopment of any of the proposed 14 sites, for example members of the congregation at Sureway Church and Brixton Unitarian Church (Proposed Sites 23 and 21), We are 336 (Proposed Site 17), groups using Mosaic Centre (Proposed Site 21)

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Table B.2: Sites with residents' associations affected by redevelopment

Brixton Road (Site 17)	WeAre336 own, occupy and lease this building. They are a registered charity that supports disabled people and their organisations by providing an accessible disability hub at the building at 336 Brixton Road. People can access advice and support from the wide range of disability organisations based here. This provision is being enhanced by the development of a One-Stop Information Shop which is the first project of Lambeth Centre for Independent Living currently being established by organisations with the support of WeAre336.
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Effra Road (Site 21)	<p>Brixton Unitarian Church owns and occupies 400sqm at this site. It is a liberal Christian multi-faith church welcoming of those of all faiths and none.</p> <p>Mosaic Clubhouse also occupies 700sqm space at this site (leased from the Council). It supports people who are living with a mental health condition in Lambeth. The Clubhouse offers its members and visitors a wide range of opportunities, access to education and employment, crisis support and information and signposting to other local organisations.</p>
Corner Coldharbour Lane and Herne Hill (Site 23)	Sureways International Ministries occupies 1058sqm as place of worship. Sunday service is attended by approximately 250 people. It is noted that there are no planning conditions limiting the times of operation, or the capacity of the church. It is a Christian church that welcomes all backgrounds.

- Landowners of proposed 14 sites and landowners surrounding the proposed sites – we do not currently know much about their protected characteristics (if any).
- Neighbourhood planning groups (existing) - There are neighbourhood planning forums for South Bank and Waterloo; Norwood Planning Assembly; and Kennington, Oval and Vauxhall. Who they represent was considered at the time they were designated as forums. A forum must have a minimum of 21 members drawn from different places in the area and different sections of the community. More information about these designated Forums in Lambeth can be found on the council's [neighbourhood planning](#) webpages.
- Businesses on proposed 14 sites – we do not currently know much about their protected characteristics (if any).

Q2b. How will they be impacted by the change?

Would you assess the impact as positive, adverse, neutral? Do you have any uncertainty about the impact of your proposal? Is there a likelihood that some people will more impacted than others? Can you describe the ways in which they will be affected? How might this change affect our 'general duty'.

B.1.11. Information on existing landuses/ownerships are provided in the draft site allocation policies. It is important to note that where sites are in existing lawful community use (e.g. church use, community hall) then the starting point in adopted Local Plan policy

is for these landuses to be re-provided as part of any proposed redevelopment of the site. Where community and voluntary groups use office space, proposed site allocation policies seek to re-provide the office floorspace. Where sites have existing housing on site, at least the same quantum of housing units, including affordable housing of equivalent tenure, will need to be re-provided on site (in accordance with local plan policy H3). Where sites have existing market housing only (eg Proposed Site 1), redevelopment of the site will require at least 35% of the replacement housing to be affordable housing for the fast-track route.

B.1.12. Detailed analysis of potential equalities impacts of the proposed site allocation policies has been undertaken as part of the statutory Sustainability Appraisal for the Draft SADPD (explained further below). This Equalities Analysis Proforma summarises the findings of this initial analysis with regards to sustainability objective 5 – Equalities.

B.1.13. The Council is required to prepare a Sustainability Appraisal (SustA) for all development plan documents (section 39 Planning and Compulsory Purchase Act 2004). A SustA has been prepared on the Draft Site Allocations DPD. A SustA is a systematic and iterative process undertaken during the preparation phases of a plan or strategy. The process tests the overall plan, including each emerging policy against the sustainability objectives that have been agreed for this purpose. The purpose of the SustA is to inform the decision-making process, by highlighting the potential implications of pursuing a particular strategy or policy response.

B.1.14. Accordingly, the Draft SA DPD is likely to be further refined after the initial round of public consultation in response to the SustA process of maximising benefits and/or minimising adverse effects as well as in response to any forthcoming consultation comments.

B.1.15. It is important to note that once adopted the SA DPD will form part of the development plan for Lambeth alongside the London Plan 2021, Lambeth Local Plan 2021 and any made neighbourhood plans (i.e. currently South Bank and Waterloo Neighbourhood Plan). All three of these development plans have undergone sustainability appraisal / integrated impact assessment and all three plans have been found sound through their respective independent examinations. The London Plan had a supporting [Integrated Impact Assessment](#) (IIA) comprising Strategic Environment Assessment, Sustainability Appraisal, EqIA, Health Impact Assessment and Community Safety Impact Assessment. A [Supplementary Equalities Impact Assessment Information](#) was also prepared. The Local Plan 2021 was subject to [Sustainability Appraisal](#) including

equalities impact assessment. The Inspector for the Draft Revised Lambeth Local Plan found the SustA to be ‘wide ranging and thorough’ (para 40 of the [Inspectors Report](#)). All London Plan and Local Plan policies will apply to the proposed site allocations and as demonstrated above all those policies within those plans have been subject to equalities impact assessment.

B.1.16. The SustA on the Draft SA DPD assesses, among other things, how protected equality groups are likely to be impacted by the policies contained in the Draft Plan. The Draft SA DPD has been assessed against 19 sustainability objectives (the same objectives as the Local Plan was appraised against). While there is a specific objective on equality and diversity (SustA Objective 5), a number of other objectives seek to improve outcomes for various protected equality groups. For example, there are SustA objectives on health and well-being, access and services, addressing crime and fear of crime, housing, liveability and social cohesion, transport, education and skills, local economy and tackling worklessness – all of which apply to, and seek to benefit, different protected equality groups.

SA Objective 5 states: To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion. To achieve this objective, plan policies should promote a culture of equity, fairness and respect for people and the environment; improve environmental conditions for Lambeth’s deprived areas and deprived communities; reduce poverty and social exclusion; remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination; promote social cohesion within and between population groups; enable social integration between minority groups and wider society; address housing, cultural, social and employment needs of those with protected characteristics; and promote adequate accessibility, in particular for older and disabled people.

B.1.17. The table below sets out a summary of the Sustainability Appraisal outcomes on the potential effects on protected equality groups for the proposed 14 site allocations.

Table B.3: Sustainability Appraisal Outcomes

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
Site 1 – Royal Street SE1	<ul style="list-style-type: none"> • No fewer than 129 self-contained residential units • Office floor-space including 30% that is lab-enabled, contributing to the SCI innovation/life-sciences district • Affordable workspace, including skills and education hub and business incubator space • Ground floor cultural uses, community space and business units for shops and food and drink outlets 	<p>Positive effects on equality groups:</p> <ul style="list-style-type: none"> • Current residential units on site provides no affordable housing. Requiring replacement of at least existing quantum of self-contained units will result in 35% affordable housing delivered on site, 70% of which will be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth and Waterloo in particular for affordable housing. • Provision of affordable workspace – 10 per cent of the net uplift in office floorspace must be provided as affordable workspace at a 50 per cent reduction from market values for a period of 15 years. This will have a positive effect on those in Lambeth wishing to start and grow small businesses. • Employment and Skills Plan to secure jobs and training opportunities for Lambeth residents within the health and life sciences, low carbon, creative, digital and artificial intelligence sectors • Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. • Public realm improvements including widened footways on Royal Street; protected pedestrian areas where vehicles are expected to be larger and/or manoeuvring – will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children • Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. • Located in an area with exceptional public transport accessibility, including step-free access to trains and tube at Waterloo Station • Improved opportunities for active travel, through better pedestrian and cycle routes and cycle infrastructure and car free development – this will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change • Close proximity to a variety shops, services and facilities and employment areas • Promotes social cohesion within and between population groups • Enables social integration between minority groups and wider society

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<ul style="list-style-type: none"> • Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area • New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. • Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. • Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. <p>Potential uncertain effects on equality groups:</p> <ul style="list-style-type: none"> • Potential impact on nearby small and independent businesses in Lower Marsh <p>Recommendation (already incorporated into Draft SADPD):</p> <ul style="list-style-type: none"> • Site allocation policy should require contribution to maintenance of existing open spaces as development of the site will result in significant increased usage of existing parks and open spaces. • Whilst Local Plan policy S2 will apply, SA policy could specify community uses are to be designed in such a way to facilitate shared/flexible use of space to appeal to a wider range of people (eg young, older, maternity/paternity, disabled, health groups), and accommodate facilities that could be used for longer hours and weekdays as well as weekends
St Thomas' Hospital SE1	<ul style="list-style-type: none"> • Hospital and ancillary uses • Re-provision of Florence Nightingale Museum on-site or at an appropriate alternative location 	<p>Positive effects on equality groups:</p> <ul style="list-style-type: none"> • Enhanced clinical care facilities • Contribute to growing SC1 LifeSciences and MedTech health cluster • Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. • Protected pedestrian areas where vehicles are expected to be larger and/or manoeuvring will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children • Consideration of community safety early in the design process of the development will have positive effects on

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<p>several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities.</p> <ul style="list-style-type: none"> • Located in an area with exceptional public transport accessibility, including step-free access to trains and tube at Waterloo Station. • Car free development will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change
Stamford Street SE1	<ul style="list-style-type: none"> • Flexible community/office floorspace at ground floor • Approximately 30-40 self-contained residential units 	<p>Positive effects on equality groups:</p> <ul style="list-style-type: none"> • Additional residential units of which at least the required threshold will be affordable housing, 70% of which will be low-cost social rent and 30% intermediate housing This will help address unmet need in Lambeth and Waterloo in particular for affordable housing. • Potential for additional community space that could complement adjoining Coin Street Neighbourhood Centre • Potential for new office floorspace of which 10% must be provided as affordable workspace at a 50 per cent reduction from market values for a period of 15 years. This will have a positive effect on those in Lambeth wishing to start and grow small businesses. • Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. • Located in an area with exceptional public transport accessibility, including step-free access to trains and tube at Waterloo Station. • Improved opportunities for active travel, through better pedestrian and cycle routes and cycle infrastructure – this will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change • Public realm improvements including new, high quality public space on Samford Street with potential for a kiosk on the corner with Cornwall Road – will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children • Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. • Car free development in air quality focus area will have significant health and well-being impacts particularly for

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<p>people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change</p> <ul style="list-style-type: none"> • Close proximity to a variety shops, services and facilities and employment areas • Promotes social cohesion within and between population groups • Enables social integration between minority groups and wider society • Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area • New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. • Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of who have protected characteristics around race, age and disability for example. • Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. <p>Recommendation:</p> <ul style="list-style-type: none"> • Site allocation policy should require contribution to maintenance of existing open spaces if development of the site will result in significant increased usage of existing parks and open spaces.
Gabriel's Wharf and Princes Wharf SE1	<ul style="list-style-type: none"> • Mixed-use redevelopment • Active frontage and cultural uses ground floor including range of small and medium sized units for independent businesses and cultural uses • Housing • Potential for offices and/or workspace 	<p>Positive effects on equality groups:</p> <ul style="list-style-type: none"> • Provision of new additional housing on site which if C3 units will include at least the threshold level of affordable housing of which 70% will be low-cost social rent and 30% intermediate housing. If the housing is not conventional self-contained housing but another form of housing such as Shared Living, then an affordable housing contribution will still be required, to be spent elsewhere in Lambeth. This will help address unmet need in Lambeth and on-site provision would help address need in Waterloo in particular for affordable housing. • Site allocation policy makes clear there is particular opportunity on this site to provide job and training opportunities for local people in the creative and cultural industries and hospitality sector. • Provision of small and medium sized unit for independent businesses and culture uses could potentially be of benefit to some protected groups who wish to set and grow businesses in the borough • Promoting employment and training opportunities for local people will generate local employment

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<p>opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion</p> <ul style="list-style-type: none"> • Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. • New vibrant and attractive pedestrian routes to be created on eastern and western boundaries • Located in an area with exceptional public transport accessibility, including step-free access to trains and tube at Waterloo Station • Improved opportunities for active travel, through better pedestrian and cycle routes and cycle infrastructure and car free development – this will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change • Close proximity to a variety shops, services and facilities and employment areas • Promotes social cohesion within and between population groups • Enables social integration between minority groups and wider society • Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area • New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. • Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. • Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. <p>Recommendation:</p> <ul style="list-style-type: none"> • Site allocation policy should require contribution to maintenance of nearby existing open spaces as development of the site will result in significant increased usage of existing parks and open spaces. • The local planning authority may wish to consider stipulating provision of self-contained residential units at this site.

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
330-336 Brixton Road SW9	<ul style="list-style-type: none"> • Mixed use development • Reprovision of the existing quantum of office floorspace. • Reprovision of the existing community use to equivalent or better functionality, unless the existing clinical facility is re-provided elsewhere as part of an agreed strategy for provision of that service • At least 1,289sqm light industrial workspace (to achieve no net loss of existing industrial floorspace capacity). • Approximately 70 to 75 self-contained residential units, with the quantum depending on the relative proportions of other uses on the site. 	<p>Positive effects on equalities</p> <ul style="list-style-type: none"> • Provision of new additional self-contained residential housing to the site. The affordable housing threshold will range from 35% to 50% as the site is in a mix of public and private ownership. Of the affordable housing offer 70% will be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. • Site allocation policy encourages the particular opportunity to provide jobs and skills training for local people in the creative industries. • Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. • Provision light industrial workspace and therefore employment and business opportunity for local people – particularly in the creative industries, within the Brixton Creative Enterprise Zone • Reprovision of community use on site (unless the existing clinical facility is re-provided elsewhere). The existing clinical facility provides mental health services and substance misuse services for people who are addicted to drugs and alcohol. 332-334 Brixton Road is owned by South London and Maudsley NHS Foundation Trust. • Reprovision of existing quantum of office floorspace provides opportunity for improved accommodation for existing users WeAre336 (a registered charity that supports disabled people and their organisation by providing an accessible disability hub). This has potential to significantly improve the accessibility of the building, and indeed of all buildings on the site • Improved opportunities for active travel, through better pedestrian infrastructure and car free development – this will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change • Public realm improvements for pedestrian safety – will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children • Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. • Close proximity to a variety shops, services and facilities in Brixton town centre • Promotes social cohesion within and between population groups

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<ul style="list-style-type: none"> • Enables social integration between minority groups and wider society • Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area • New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. • Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. • Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. <p>Potential uncertain effects on equality groups:</p> <ul style="list-style-type: none"> • Risk the redevelopment is not undertaken in a comprehensive way, or that piecemeal development does not address the wider vision for the site, therefore the full benefits of the site allocation are not achieved.
Tesco Acre Lane SW2	<ul style="list-style-type: none"> • Replacement supermarket with self-contained residential units 	<p>Positive effects on equalities:</p> <ul style="list-style-type: none"> • Provision of new additional self-contained residential housing to the site. The affordable housing threshold will be 35% of which 70% will be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. • Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. • Located in an area with exceptional public transport accessibility, including step-free access to the tube at Brixton Underground Station. • Close proximity to a variety shops, services and facilities in Brixton town centre • Significantly improved pedestrian environment, including wider footway along Acre Lane and urban greening; and improved cycle infrastructure. This will increase opportunities for active travel, which will have health and well-being benefits for groups with protected characteristics, as well as helping to improve accessibility for those with mobilities difficulties (such as older people, people with disabilities, families with very young children). • Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<p>people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities.</p> <ul style="list-style-type: none"> • promotes social cohesion within and between population groups • enables social integration between minority groups and wider society • Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area • New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. • Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. • Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. <p>Potential uncertain effects on equality groups:</p> <ul style="list-style-type: none"> • Risk that the reprovided store does not fully optimise the potential to improve pedestrian accessibility and active travel.
51-65 Effra Road	<ul style="list-style-type: none"> • Comprehensive mixed-use redevelopment • Replacement community space of equivalent or better functionality to that already on site • New light industrial workspace appropriate to Brixton Creative Enterprise Zone • Approximately 200 to 240 self-contained residential units 	<p>Positive effects on equalities:</p> <ul style="list-style-type: none"> • Provision of essentially new additional self-contained residential housing to the site. The affordable housing threshold will range from 35% to 50% as the site is in a mix of public and private ownership. Of the affordable housing offer 70% will be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. • Community uses are to be re-provided so the church and daycentre currently on-site will have opportunity to remain on the site • Site allocation policy encourages the particular opportunity to provide jobs and skills training for local people in the creative industries • Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. • Provision light industrial workspace and therefore employment and business opportunity for local people • Located in an area with exceptional public transport accessibility, including step-free access to the tube at Brixton Underground Station.

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<ul style="list-style-type: none"> Public realm improvements including using Rush Common land to provide an enhanced walking route that is fully publicly accessible and making clear a pedestrian priority design will be expected where vehicles cross pavements along Effra Road will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. Car free development in air quality focus area will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change Close proximity to a variety shops, services and facilities in Brixton town centre promotes social cohesion within and between population groups enables social integration between minority groups and wider society Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. <p>Potential uncertain effects on equality groups:</p> <ul style="list-style-type: none"> Risk the redevelopment is not undertaken in a comprehensive way, or that piecemeal development does not address the wider vision for the site, therefore the full benefits of the site allocation are not achieved <p>Recommendation (already incorporated into Draft SADPD):</p> <ul style="list-style-type: none"> Whilst Local Plan policy S2 will apply, SA policy could specify community uses are to be designed in such a way to facilitate shared/flexible use of space to appeal to a wider range of people (e.g. young, older, maternity/paternity, disabled, health groups), and

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<p>accommodate facilities that could be used for longer hours and weekdays as well as weekends</p> <ul style="list-style-type: none"> The EIA Panel recommended that officers add wording to the draft allocation policy for this site to ensure affordability and transitional arrangements for the M clubhouse are appropriately considered. Officers agreed to do this, and relevant wording has been added to the draft allocation policy.
Leigham Court Road Car Park SW16	<ul style="list-style-type: none"> Mixed-use development Approximately 30 – 35 self-contained residential units Active frontage ground floor commercial floorspace within Class E 	<p>Positive effects on equality groups:</p> <ul style="list-style-type: none"> Provision of new additional self-contained residential housing to the site. The affordable housing threshold will be 50% as the site is in public ownership. Of the affordable housing offer 70% will be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. Located in an area with exceptional public transport accessibility, including step-free access to Streatham Hill Rail Station Close proximity to a variety shops, services and facilities in Streatham town centre New, high quality space for small businesses Accessible business space that will improve accessibility to shops and small businesses within this part of Streatham town centre. Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area New housing will have significantly higher energy performance, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. Car free development and loss of carpark in air quality focus area will have significant health and well-being

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change
Site 18 286-362 Norwood Road SE27	<ul style="list-style-type: none"> • Comprehensive mixed-use redevelopment • Approximately 390 – 470 self-contained residential units (gross) • Approximately 5,000 to 7,000sqm of commercial/community floorspace, including new workspace 	<p>Positive effects on equality groups:</p> <ul style="list-style-type: none"> • Provision of additional self-contained residential housing to the site (approx. 310 – 390 net additional units). The affordable housing threshold will range from 35% to 50% as the site is in a mix of public and private ownership. Of the affordable housing offer 70% will be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. • Reprovision of existing affordable housing on site will be required. • Community uses are to be re-provided so the church currently on-site will have opportunity to remain on the site • New, high quality space for small businesses • Accessible business space that will improve accessibility to shops and small businesses within this part of Streatham town centre. • Site allocation policy encourages particular opportunity to provide jobs and training opportunities for local people within the creative and digital industries or other town centre sectors such as retail, hospitality and leisure. • Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. • Improved permeability (vehicular, pedestrian, cycle) through the site and public realm improvements will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children • Improved opportunities for active travel, through better pedestrian and cycle routes and cycle infrastructure and car free development and public realm improvements – this will have significant health and well-being impacts, and well as improving air quality and helping to mitigate climate change • Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. • Located in an area with very good public transport accessibility including step-free access at West Norwood Rail Station • Close proximity to a range of shops, services and facilities in West Norwood town centre

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<ul style="list-style-type: none"> • Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area • New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. • Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. • Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. <p>Potential uncertain effects on equality groups:</p> <ul style="list-style-type: none"> • Risk the redevelopment is not undertaken in a comprehensive way, or that piecemeal development does not address the wider vision for the site, therefore the full benefits of the site allocation are not achieved <p>Recommendation (already incorporated into Draft SADPD): Whilst Local Plan policy S2 will apply, SA policy could specify community uses are to be designed in such a way to facilitate shared/flexible use of space to appeal to a wider range of people (e.g. young, older, maternity/paternity, disabled, health groups), and accommodate facilities that could be used for longer hours and weekdays as well as weekends</p>
Knolly's Yard SW16	<ul style="list-style-type: none"> • Industrial intensification through provision of at least 1500sqm high quality light industrial workspace – particularly creative and digital and/or low carbon sectors • Approximately 400 – 430 self-contained residential units 	<p>Positive effects on equality groups:</p> <ul style="list-style-type: none"> • Retaining the site for industrial uses provides local people employment opportunities / land for business development • Provision of additional self-contained residential housing to the site. The affordable housing threshold will be 50% as the site is in public ownership. Of the affordable housing offer 70% will be low-cost social rent and 30% intermediate housing. This will help address unmet need in Lambeth in particular for affordable housing. • Site allocation policy encourages particular opportunity to provide jobs and training for local people within the creative and digital industries or/low carbon sector. • Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. • Close proximity to variety of shops, services and facilities at West Norwood/Tulse Hill town centre – with

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<p>significant potential for improved connectivity to the town centre for those using the site and those in neighbouring streets who will be able to use the new route.</p> <ul style="list-style-type: none"> Public transport accessibility is mixed across the site – West Norwood Rail Station has step-free access and is about 900m walking distance away – as above, there is potential for this distance to be significantly reduced Improved opportunities for active travel, through better pedestrian and cycle routes and cycle infrastructure, including fully accessible footbridge that connects to Leigham Vale – this will have significant health and well-being impacts, result in improved accessibility to services, public transport, jobs and shops as well as improving air quality and helping to mitigate climate change Public realm improvements on Cameron Place and fully accessible footbridge that connects to Leigham Vale – will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children Car free development will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. <p>Uncertain effects on equality groups:</p> <ul style="list-style-type: none"> Significant new infrastructure to improve vehicular and pedestrian access to the site is required – any new

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<p>pedestrian access (footbridge) will need to enable step-free access for those with mobility issues</p> <p>Recommendation (already incorporated into Draft SADPD):</p> <ul style="list-style-type: none"> The site allocation should specifically state that the fully accessible footbridge should be fully accessible for pedestrians, cyclists <i>and those with mobility issues</i>.
<p>6 – 12 Kennington Lane and Wooden Spoon House SE11</p>	<ul style="list-style-type: none"> Comprehensive mixed-use redevelopment At least 2200sqm light industrial floorspace Approximately 135 – 145 self-contained residential units Replacement community use of equivalent or better functionality to existing space 	<p>Positive effects on equality groups:</p> <ul style="list-style-type: none"> Provision of additional self-contained residential housing to the site. The affordable housing threshold is 35% on 6-12 Kennington Lane, which is in private ownership, and 50% on 5 Dugard Way, which is in public sector ownership (or 42% across the whole site). This will help address unmet need in Lambeth in particular for affordable housing. Community uses are to be re-provided Provision light industrial workspace and therefore employment and business opportunity for local people Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. Located in an area with exceptional public transport accessibility, including step-free access to the tube at Elephant and Castle Underground Station but only southbound on the northern line. Close proximity to a variety shops, services and facilities in neighbouring Elephant and Castle town centre Widening footpath along the Kennington Lane frontage to improve pedestrian movement, accessibility and safety – this will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children Car free development will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change Maintaining Renfrew Road as the primary local pedestrian north-south route. This will reinforce community safety by avoiding pedestrian dispersal, especially at night. This has potential to benefit many protected groups including women, younger and older persons, LGBTQ+, faith and race groups. Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. Promotes social cohesion within and between population groups Enables social integration between minority groups and wider society

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<ul style="list-style-type: none"> • Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area • New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. • Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. • Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. <p>Potential uncertain effects on equality groups:</p> <ul style="list-style-type: none"> • Risk the redevelopment is not undertaken in a comprehensive way, or that piecemeal development does not address the wider vision for the site, therefore the full benefits of the site allocation are not achieved <p>Recommendation (already incorporated into Draft SADPD): Whilst Local Plan policy S2 will apply, SA policy could specify community uses are to be designed in such a way to facilitate shared/flexible use of space to appeal to a wider range of people (e.g. young, older, maternity/paternity, disabled, health groups), and accommodate facilities that could be used for longer hours and weekdays as well as weekends</p>
1&3 Wellfit Street, 7-9 Hinton Road, Units 1-4 Hardess Street SE24	<ul style="list-style-type: none"> • Approximately 70-90 self-contained residential units • At least 1400sqm light industrial workspace 	<p>Positive effects on equality groups:</p> <ul style="list-style-type: none"> • Provision of new additional self-contained residential housing to the site. The affordable housing threshold is 35% if there is no net loss of industrial floorspace capacity, but 50% if there is a net loss in this capacity. This will help address unmet need in Lambeth in particular for affordable housing. • Reprovision of light industrial workspace and therefore employment and business opportunity for local people, particularly in the creative sectors within the Brixton Creative Enterprise Zone • Site allocation policy encourages the particular opportunity to provide jobs and skills training opportunities for local people in the creative and digital sectors • Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. • Located in an area with generally good public transport accessibility

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<ul style="list-style-type: none"> • Close proximity to a variety shops, services and facilities in Loughborough Junction local centre and Brixton town centre a short distance away as well as near to King's College Hospital – improved pedestrian movement through the area which will have positive benefits for those with mobility difficulties, including some people with disabilities, older people and families with very young children • Improved opportunities for active travel, through better pedestrian and cycle routes and cycle infrastructure and car free development – this will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change • Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. • promotes social cohesion within and between population groups • enables social integration between minority groups and wider society • Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area • New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. • Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. • Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses.
Land at corner of Coldharbour Lane and Herne Hill Road SE24	<ul style="list-style-type: none"> • Replacement community use of equivalent or better functionality • Alternatively flexible town centres uses with Class with ground floor active frontage • Approximately 25 – 30 self-contained residential units • Light industrial uses along Junction Yard 	<ul style="list-style-type: none"> • Provision of new additional self-contained residential housing to the site. The affordable housing threshold is 35%. • Reprovision of community use so the existing church can remain on site • Reprovision of light industrial workspace and therefore employment and business opportunity for local people, particularly in the creative sectors within the Brixton Creative Enterprise Zone • Site allocation policy encourages the particular opportunity to provide jobs and skills training opportunities for local people in the creative and digital sectors • Promoting employment and training opportunities for local people will generate local employment

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		<p>opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion.</p> <ul style="list-style-type: none"> • Located in an area with generally good public transport accessibility • Close proximity to a variety shops, services and facilities in Loughborough Junction local centre and Brixton town centre a short distance away as well as near to King's College Hospital • Promotes social cohesion within and between population groups • Enables social integration between minority groups and wider society • Public realm improvements including widened footway on Coldharbour Lane – will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children • Car free development will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change • Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities. • Extensive new green infrastructure will improve health and well-being for those living, working and visiting in the area • New housing will have significantly higher energy performance than existing, which will reduce carbon emissions and fuel bills. This will be a particular benefit to those on lower incomes occupying the new affordable housing. • Net zero carbon across the whole development will have wider societal impacts on climate change mitigation, which will help address the unequal impacts of climate change on lower income groups, many of whom have protected characteristics around race, age and disability for example. • Flood risk mitigation on the site will provide indirect equality benefits to protected groups for example through mitigating flood damage to homes and businesses. <p>Recommendation: Whilst Local Plan policy S2 will apply, SA policy could specify community uses are to be designed in such a way to facilitate shared/flexible use of space to appeal to a wider range of people (e.g. young, older, maternity/paternity, disabled, health groups), and accommodate facilities that</p>

Site	Proposed land uses	Sustainability Appraisal – Equalities Objective (5) analysis
		could be used for longer hours and weekdays as well as weekends
King's College Hospital	<ul style="list-style-type: none"> Reconfiguration and optimisation of hospital estate for clinical service provision and associated research and development activity 	<p>Positive effects on equality groups:</p> <ul style="list-style-type: none"> Expanded health services and associated research and development activity for the health sector Promoting employment and training opportunities for local people will generate local employment opportunities and reduce the need to travel. Focusing activities mainly on those most marginalised from the workforce, including those that lack the skills required by employers, will help to reduce deprivation and inequalities and improve social inclusion. Public realm improvements including widened footways and; protected pedestrian areas where vehicles are expected to be larger and/or manoeuvring – will result in improved accessibility for those with mobility difficulties, including some people with disabilities, older people and families with very young children Improved opportunities for active travel, through better pedestrian and cycle routes and cycle infrastructure and car free development – this will have significant health and well-being impacts particularly for people with long-term health conditions, older people younger people, and well as improving air quality and helping to mitigate climate change Consideration of community safety early in the design process of the development will have positive effects on several protected equality groups, for example, older people, younger people, those of certain faiths, LGBTQ+, race groups, disabilities.

B.1.18. Overall, it is considered the Draft SA DPD will likely result in generally positive impacts on different protected groups in Lambeth. Many of the positive impacts relate to housing, including affordable housing, affordable workspace, employment and skills, reprovision of community facilities and access to a variety of services and facilities, improved public realm, improved community safety, improved opportunities for active travel, urban greening, flood risk mitigation, climate change mitigation and adaptation, and improvement to air quality.

B.1.19. Recommendations arising from the EqIA that have now been incorporated into the Draft SA DPD include:

- where community uses are proposed, that it is stipulated that such spaces are designed to be flexible to enable a range of groups to use the premises at various times of the day and week; and

- contributions to maintenance of nearby open spaces for larger sites in Waterloo given likely significant increase in usage.
- Knolly's Yard site allocation policy should specify that the fully accessible footbridge should be fully accessible for pedestrians, cyclists *and those with mobility issues*.
- In response to a recommendation from the EIA Panel the wording of the draft policy for SA21 has been updated to ensure appropriate consideration of affordability and transitional arrangement for the Mosaic Clubhouse.

B.1.20. The EqIA has identified some potential uncertain effects on equality groups. For sites that are in multiple land ownership there is a risk the redevelopment is not undertaken in a comprehensive way, or that piecemeal development does not address the wider vision for the site, and therefore the full benefits of the site allocation are not achieved. This may affect sites 332-336 Brixton Road, 51-65 Effra Road, 6-12 Kennington Lane, 286-362 Norwood Road. Other uncertainties identified are site specific:

- Tesco Acre Lane - Risk that the reprovided store does not fully optimise the potential to improve pedestrian accessibility and active travel.
- Royal street - Potential impact of the development on nearby small and independent businesses in Lower Marsh.

B.1.21. The provision of safe and secure walking and cycling routes should have positive impacts on those who are more likely to suffer harassment in the streets, such as LGBTQ+ and BAME groups and also those with mental health issues. However, the whole journey experience needs to be accessible, from leaving the house to arriving at the desired destination. All journeys, particularly those made by public transport, involve an element of walking. People with disabilities, and powered mobility scooters and wheelchairs users all use (or should be able to use) footpaths as part of their journeys in a safe and inclusive manner. It is noted that the IDP identifies funding gaps for some transport projects, for example Healthy Route Network, Low Traffic Neighbourhoods, Loughborough Junction Public Realm which suggests it is uncertain when such projects can be delivered. Until they are, adverse impacts for some protected groups will continue.

B.1.22. It is noted that some proposed Site Allocations are close to public transport (rail and/or tube stations) that do not have step-free access. The site allocation is not going to worsen the problem of lack of step-free access, but the indirect consequence is that those using the site will experience that lack of step-free access. Mitigation to address

this is that all the new development proposed under the Draft SA DPD (as well as from other developments) will bring with it Community Infrastructure Levy (CIL) payments that can contribute towards providing step-free access in accordance with the approach identified in the Infrastructure Delivery Plan.

Q3a. How do you plan to promote and deliver any positive impacts of the proposal?

How might the principles of fairness, equality of opportunity and positive relationships be further promoted as a consequence of this proposal? How do you propose to measure your positive outcomes and the benefits outlined to find out if these have been achieved?

B.1.23. Provided Cabinet agrees, the Draft SA DPD will be promoted in the first instance through Regulation 18 public consultation for a period of six weeks starting January 2022.

B.1.24. The full Consultation and Engagement Plan (C&E Plan) for the Draft SA DPD is attached. The primary method for seeking stakeholders' views will be Commonplace, a digital consultation platform used by the Council. This is designed to be easy to access on smartphones and tablets and has successfully been used in a number of recent Council consultations. The consultation material will be written as far as possible in plain English, avoiding technical jargon wherever possible. The C&E Plan sets out the consultation methods to be used including how it is proposed to engage with those groups with community engagement challenges, for example those more disadvantaged socio-economic groups, some older people, some younger people, some disabled people and some people for whom English is not their first language. For these groups the C&E Plan sets out the measures to get a range of people to respond within the resources available. For groups with community engagement challenges the Plan proposes to use social media channels, have publicity through the Young Lambeth Coop and Youth Council, word of mouth from ward councillors, meeting with groups representing people with disabilities and availability of support offered in libraries. There will also be meetings with community groups in different parts of the borough.

B.1.25. A feature of Commonplace is the ability to send out targeted reminders to specific groups during the consultation, based on analysis of the demographic characteristics of those who have responded so far. This will help encourage and further alert more people of different protected equality groups to respond to the consultation.

B.1.26. Following the first round of consultation, comments will be considered by officers and the Draft SA DPD will be amended accordingly where appropriate for pre-submission publication of the SA DPPD Proposed Submission Version (an opportunity to comment on legal compliance, soundness and compliance with the duty to co-operate). Submission (start of examination) is expected in Spring 2023 with the examination hearing Summer 2023 and adoption of the SA DPD in Winter 2023/24.

B.1.27. Delivery of the SA DPD (once adopted) will be through the planning application decision-making process and through publishing data on what is actually being delivered through statutory duty monitoring reports. The Lambeth Local Plan 2021 includes a series of monitoring indicators covering the range of policy topics that are also applicable to the SA DPD, such as overall housing delivery, affordable housing, affordable workspace, office floorspace, industrial land, open space and green infrastructure, transport and air quality. These monitoring indicators help determine how policies are working in practice and how successful they are, and this information will be used to consider whether policies may need to change in any future review. All planning policy monitoring data is published [on-line](#). Data on housing and employment also inputs into corporate KPIs.

Q3b. How do you plan to address and mitigate any negative impacts of the proposal?

What impact has this evidence had on what you are proposing? What can you do differently that might lessen the impact on people within the timeframes i.e. development-implementation? Who can help you to develop these solutions?

B.1.28. The purpose of the SustA work on the Draft SA DPD is to appraise site allocation policies against the sustainability framework and where appropriate make recommendations to either improve positive impacts or avoid/mitigate negative impacts in implementing the SA DPD. Recommendations made through the SustA process are considered by officers preparing the Draft SA DPD and may result in the Draft SA DPD being amended accordingly. Importantly, policies within the London Plan 2021 and the Lambeth Local Plan 2021 will apply to the site allocations within the Draft SA DPD. Both these planning documents have been subject to their own sustainability appraisal and equalities impact assessment and were each found to be thorough and sound during their respective independent examinations.

B.1.29. The Equality Act 2010 places a duty on officers and the council to have due regard to the impact our policies and decisions have on people with 'protected characteristics': sex, race, disability, sexual orientation, age, religion or belief, gender reassignment, pregnancy, and maternity, and to ensure no negative equalities impacts from planning

decisions. Accordingly, the Equality Duty supports good decision-making to ensure policies and services are appropriate and accessible to all and meet different people's needs and that equality considerations in all stages of policy making process have been made. It is considered that at this stage of the plan-making process preparation of the Draft SA DPD is meeting this duty.

B.1.30. Development plan policies are designed to ensure negative impacts are mitigated, either by amending the design of developments and/or through planning obligations. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. These tests are set out as statutory tests in the Community Infrastructure Levy Regulations 2010 and as policy tests in the National Planning Policy Framework. Lambeth Local Plan Policy D4 sets out that planning obligations will be sought to secure affordable housing and to ensure that development proposals provide or fund local improvements to mitigate the impact of development and/or additional facilities and requirements made necessary by the development. This may include:

- i) provision of infrastructure, such as transport, education, health,
- ii) libraries, sport and leisure, waste, energy, emergency services and
- iii) cultural and community provision
- iv) local public realm improvements including streetscape, local public
- v) open space, play facilities and community safety
- vi) mitigation of impacts on and/or enhancement of heritage assets
- vii) mitigation of noise impacts
- viii) highways and traffic works
- ix) public transport improvements
- x) local walking and cycling improvements
- xi) car clubs, parking restrictions, and travel plans
- xii) hotel and visitor management measures
- xiii) access to employment opportunities created by the development by
- xiv) securing employment premises and learning and skills initiatives
- xv) access for local businesses to supply chain opportunities created by
- xvi) the development
- xvii) small and flexible office space, affordable workspace and affordable

- xviii) retail units
- xix) maintenance and management arrangements
- xx) town centre management
- xxi) public access to on-site facilities
- xxii) low carbon and renewable energy, including carbon offset
- xxiii) sustainable drainage systems and flood risk mitigation
- xxiv) connection to, and support of, quality broadband and other
- xxv) telecommunication and information technology support networks
- xxvi) green infrastructure
- xxvii) local food production and growing; and
- xxviii) other sustainability measures, including mitigation of impacts on and/or
- xxix) enhancement of biodiversity and wildlife habitats.

B.1.31. Community Infrastructure Levy (CIL) contributions are also collected from new development to contribute towards the cost of delivering the infrastructure required to support growth and development in the borough.

**Q4. How will you review/evaluate your proposal, mitigating actions and/or benefits?
Who will be responsible for this?**

Who will you be accountable to for the above actions/outcome? How will those responsible know these actions have worked? What performance indicators will you use to demonstrate this? Are there any other forms of evidence you can use to support this assessment of their effectiveness?

B.1.32. The council is required to review its Local Plan and once adopted, SA DPD, every five years. This provides an opportunity to look again at the implementation of new or revised policies and assess their effectiveness. There are monitoring indicators in the Plan that help determine how policies are working in practice and how successful they are, and this information will be used to consider whether policies may need to change during the next review.

B.1.33. The council is also required to produce an annual monitoring report. These brings together data in other annual monitoring reports that are prepared including housing development pipeline report (includes completions and affordable housing), student accommodation assessment, hotel and visitor accommodation and commercial development pipeline report. Data is published on-line and reported internally to the lead Cabinet Member. Data on housing and employment also inputs into corporate KPIs. Following adoption of the SADPD, progress with implementation of the site allocations will be reported in the Council's annual Authority Monitoring Report.

B.1.34. The team responsible for section 106 agreements (planning obligations) and CIL reports annually on the collection and spend of financial contributions received.

B.1.35. The Local Plan monitoring indicators measure performance on matters that are directly and specifically influenced by decision-making on planning applications. Given the anticipated positive impact of Local Plan and Draft SA DPD policies on some protected characteristics groups, it is expected that positive performance against Local Plan indicators will therefore also have an indirect positive effect on more general statistics about protected characteristics groups collected/reported by other council service areas. When reviews of the Local Plan and SA DPD take place, this wider information about protected characteristics groups will be considered in addition to more narrow performance against the specific Local Plan indicators.

B.1.36. In addition to monitoring data, subsequent reviews of Local Plan and SA DPD policy will be informed by other forms of evidence and any changes to the national and/or regional planning policy context.

B.1.37. The Planning Strategy and Policy team within Planning, Transport and Development (Neighbourhoods and Growth) is responsible for reviewing/evaluating the Local Plan and collating monitoring data.

Section to be completed by Sponsor/Director/Head of Service

Outcome of equality impact assessment

No adverse impact, no change required	<input checked="" type="checkbox"/>
Low adverse impact, minor adjustment required	<input type="checkbox"/>
Significant adverse impact, further action required	<input type="checkbox"/>
Unlawful in/direct discrimination, stop and rethink	<input type="checkbox"/>

Comments from Sponsor/Director/Head of Service

Overall, the proposed policies in the Draft SA DPD are expected to have a positive impact on groups with protected characteristics, particularly those within more disadvantaged socio-economic groups, some BAME people, some disabled people and some younger and older people. On the whole, it is considered the draft site allocation policies embody a recognition that place-shaping is best addressed through a neighbourhood approach. Where development has potential for harmful impacts, Local Plan policies include measures and mechanisms to mitigate these impacts.

The C&E Plan sets out the consultation methods to be used including how it is proposed to engage with those groups with community engagement challenges, for example those more disadvantaged socio-economic groups, some older people, some younger people, some disabled people and some people for whom English is not their first language. For these groups the C&E Plan sets out the measures to get a range of people to respond within the resources available.

The Council's Equalities Impact Assessment Panel will have another opportunity to consider the draft SA DPD after Regulation 18 consultation, at the next stage of plan preparation.

Sponsor/Director/Head of Service Rob Bristow, Assistant Director Planning, Investment and Growth

APPENDIX C - COMMONPLACE SCREENSHOT EXAMPLES

Figure 2. Main Page: Header and Map

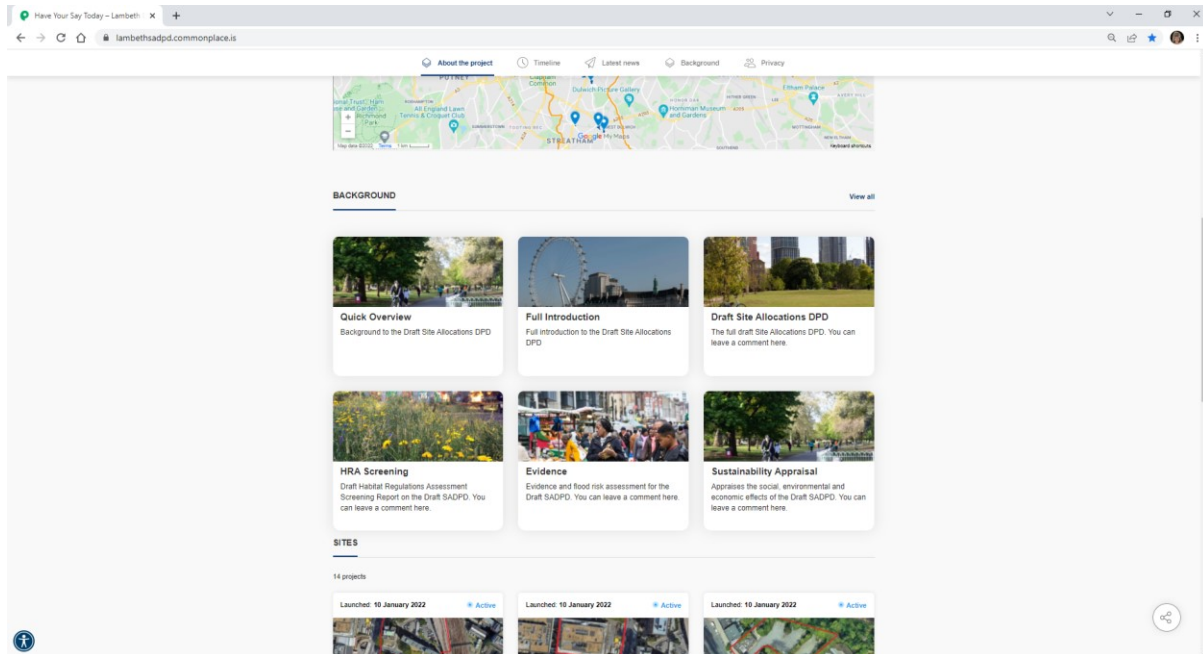


Figure 3. Main Page: Sites

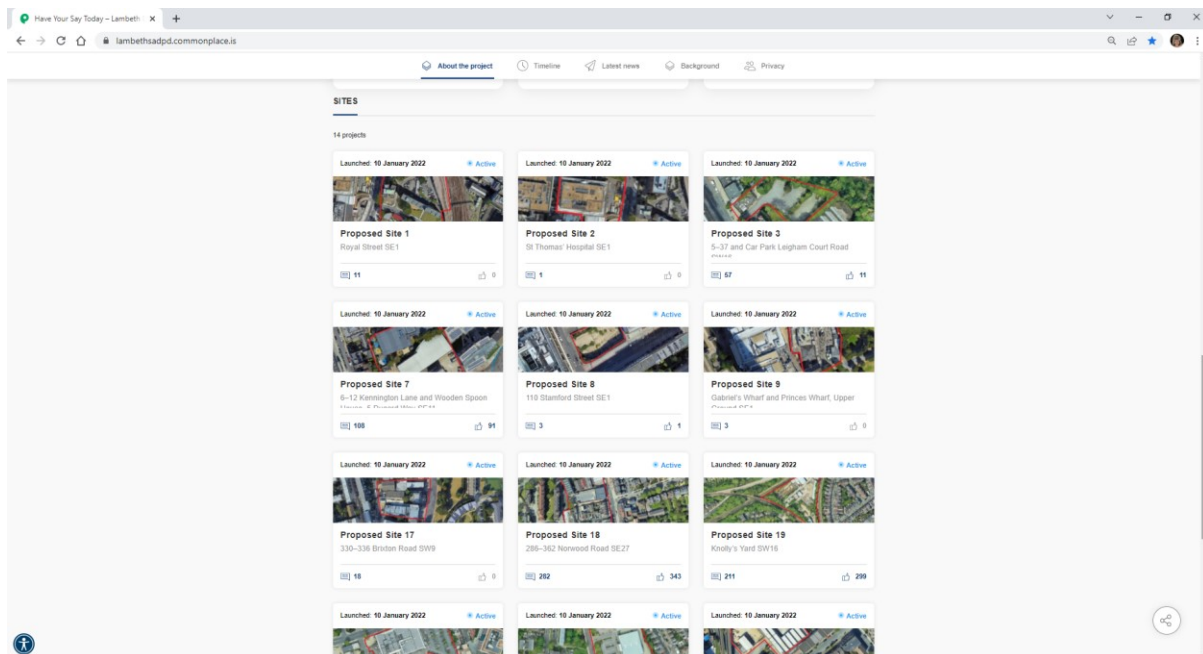


Figure 4. Background Section: Quick Overview

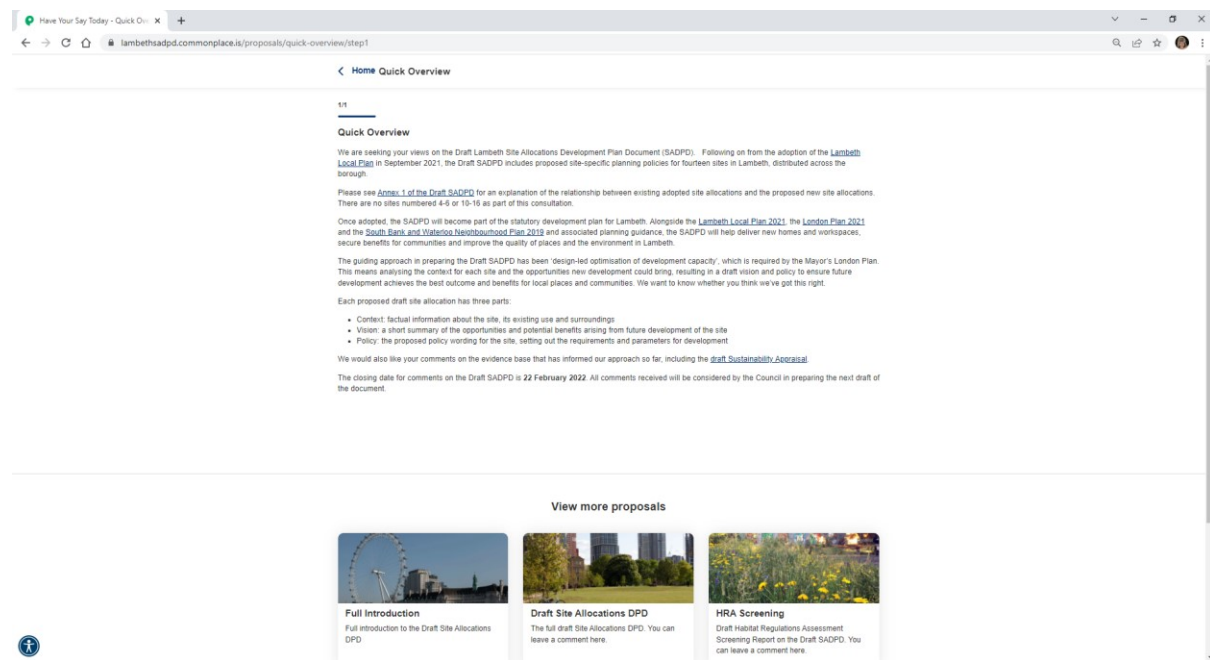


Figure 5. Background Section: Full Introduction

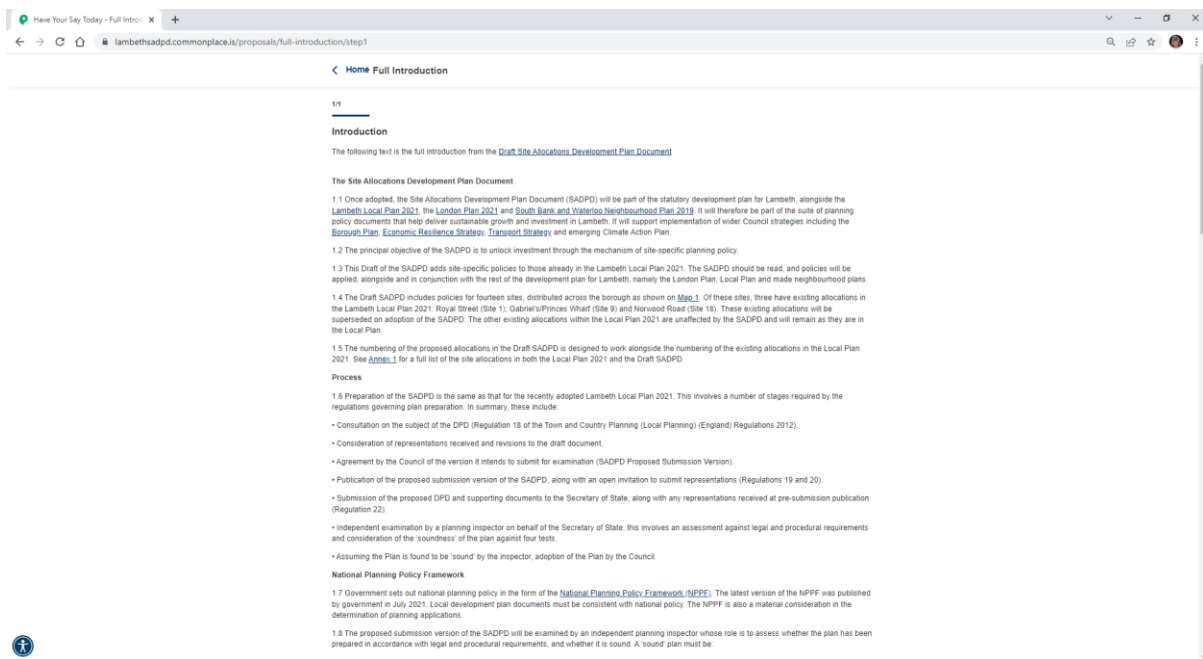


Figure 6. Background Section: Full Draft Site Allocations DPD

The screenshot shows a web browser window with the address bar displaying 'lambethsaddp.commonplace.is/proposals/site-allocations-dpd/step1'. The page title is 'Home Draft Site Allocations DPD'. Below the title, there is a progress indicator '1/1' and the heading 'Draft Site Allocations DPD'. A sub-heading states 'The Draft Site Allocations DPD can be viewed using this link:' followed by a blue link 'Draft Site Allocations DPD'. Below this, a note says 'Please use the box below for any general comments about the Draft SADPD. Comments about the proposed sites can be made using the links in the sites section on the main page.' The main content area is a large light gray box with the text 'Do you have any general comments about the draft Site Allocations DPD?' and a text input field with placeholder text 'e.g. this and that'. At the bottom of the form, there is a blue bar with the text 'What is your email address?' and a 'Next' button. A 'Back' link is also visible on the left side of the form.

Figure 7. Background Section: HRA Screening

The screenshot shows a web browser window with the address bar displaying 'lambethsaddp.commonplace.is/proposals/hra-screening/step1'. The page title is 'Home HRA Screening'. Below the title, there is a progress indicator '1/1' and the heading 'Habitat Regulations Assessment Screening Report'. A sub-heading states 'The Draft HRA Screening Report on the Draft SADPD can be viewed using this link:' followed by a blue link 'Draft HRA Screening Report'. Below this, a note says 'Please use the box below for any general comments about the Draft SADPD. Comments about the proposed sites can be made using the links in the sites section on the main page.' The main content area is a large light gray box with the text 'Do you have any comments about the Draft HRA Screening Report?' and a text input field with placeholder text 'e.g. this and that'. At the bottom of the form, there is a blue bar with the text 'What is your email address?' and a 'Next' button. A 'Back' link is also visible on the left side of the form.

Figure 8. Background Section: Evidence

The screenshot shows a web browser window with the URL `lambethadpd.commonplace.is/proposals/evidence/step1`. The page has a breadcrumb trail: `< Home Evidence`. A progress indicator shows `1/1`. The section is titled **Evidence**. The text states: "The evidence to support the proposed Site Allocations for all fourteen sites can be found here." followed by a link [Evidence document](#). Below this, it says: "This information is also available as a separate document for each site, please see the Sites section of the [main Q&A](#)." The next section is titled **Flood Risk** and states: "The flood risk evidence can be found here:" followed by a link [Flood Risk Evidence](#). A large text input area follows with the prompt: "Do you have comments about the evidence or flood risk assessment?" and a placeholder "e.g. Wix and that". Below the input area is a blue bar with the text "What is your email address?". At the bottom of this section are `< Back` and `Next >` buttons. The main content area below is empty, with a small information icon in the bottom left corner.

Figure 9. Background Section: Sustainability Appraisal

The screenshot shows a web browser window with the URL `lambethadpd.commonplace.is/proposals/sustainability-appraisal/step1`. The page has a breadcrumb trail: `< Home Sustainability Appraisal`. A progress indicator shows `1/1`. The section is titled **Sustainability Appraisal**. The text states: "The Draft Sustainability Appraisal appraises the social, environmental and economic effects of the Draft Site Allocations DfD. This helps to makes sure the document will contribute to sustainable development in Lambeth." followed by a link [Draft Sustainability Appraisal](#). A large text input area follows with the prompt: "Do you have any comments about the Draft Sustainability Appraisal?" and a placeholder "e.g. Wix and that". Below the input area is a blue bar with the text "What is your email address?". At the bottom of this section are `< Back` and `Next >` buttons. The main content area below is empty, with a small information icon in the bottom left corner.

Figure 10. Site 20: Front Page 1

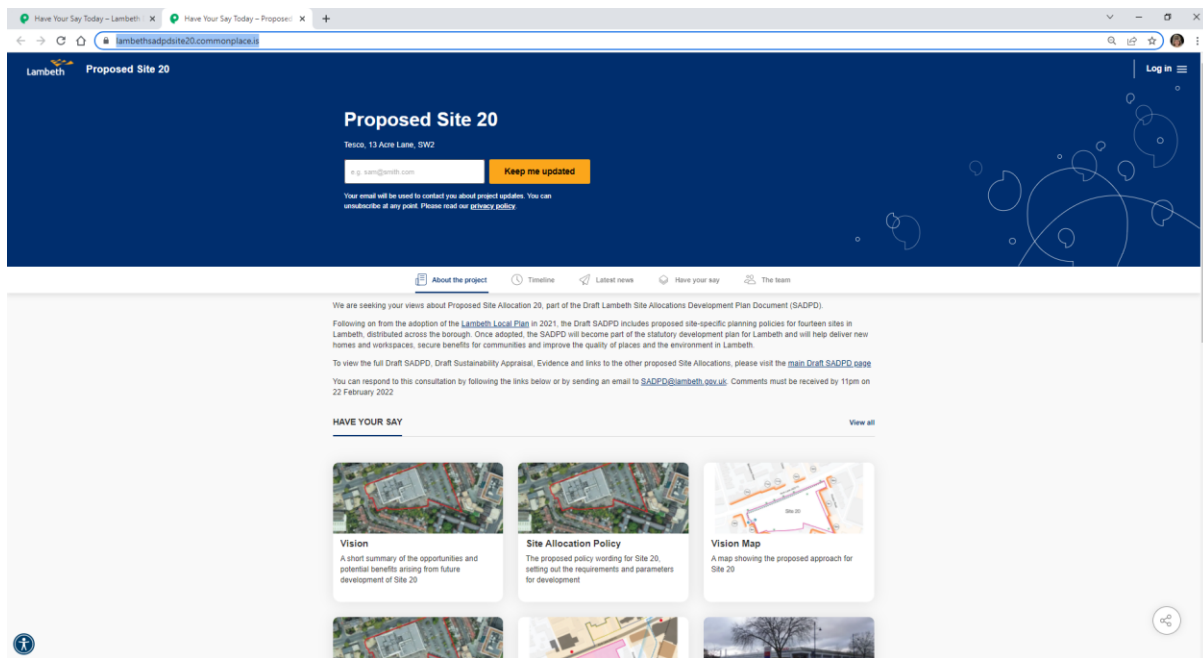


Figure 11. Site 20: Front Page 2

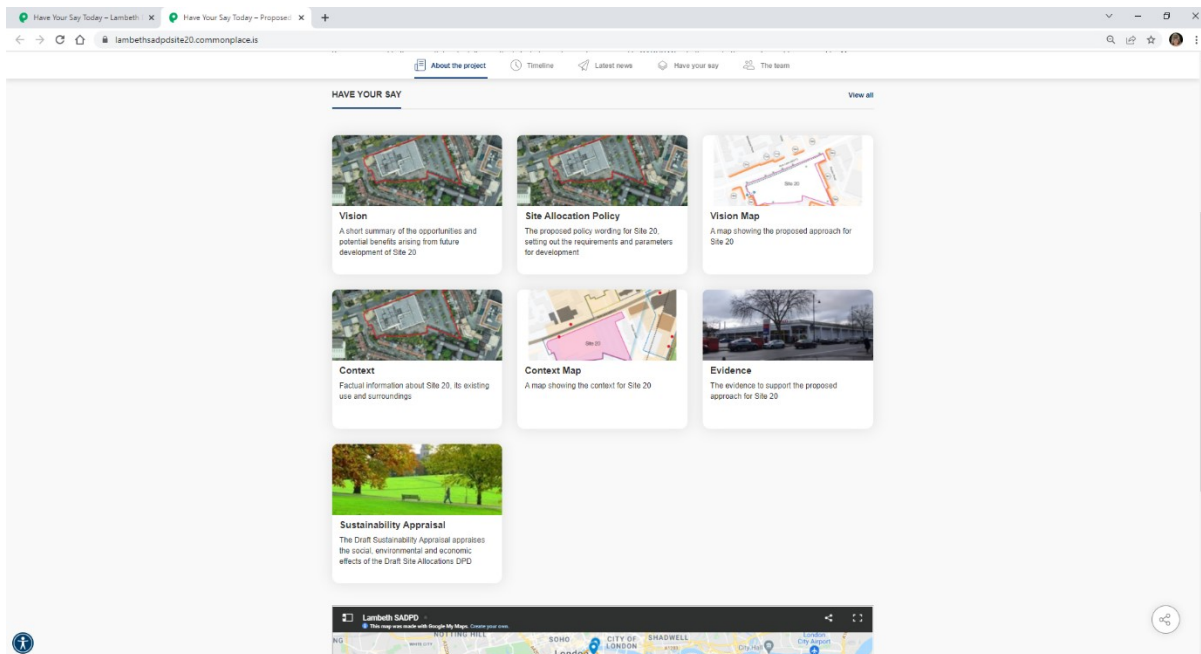


Figure 12. Site 20: Vision

The screenshot shows a web browser window with two tabs: 'Have Your Say Today - Lambeth' and 'Have Your Say Today - Vision - 1'. The address bar shows the URL: lambethadp.site20.commonplace.is/proposals/vision/step1. The page title is 'Home Vision'. Below the title, there is a progress indicator '1/1' and the section heading 'Vision'. A short summary of opportunities and potential benefits is provided. The main content area asks 'How do you feel about the Vision for Site 20?' and displays five smiley face icons ranging from sad to happy. Below this is a text box for comments: 'Do you have any comments about the vision for Site 20?'. At the bottom, there is a field for 'What is your email address?' and two buttons: 'Back' and 'Next'.

Figure 13. Site 20: Policy Wording

The screenshot shows a web browser window with two tabs: 'Have Your Say Today - Lambeth' and 'Have Your Say Today - Site Allocation Policy - 1'. The address bar shows the URL: lambethadp.site20.commonplace.is/proposals/site-allocation-policy/step1. The page title is 'Home Site Allocation Policy'. Below the title, there is a progress indicator '1/1' and the section heading 'Site Allocation Policy'. The text indicates that the following is the proposed policy wording for Site 20. The content is organized into several sections: 'Land uses' (Replacement supermarket with residential), 'Affordable housing' (35% threshold), 'Social infrastructure' (requirements of Local Plan Policy 32), 'Employment and skills' (maximise local employment), 'Digital connectivity' (requirements of Local Plan Policy 15), 'Heritage assets' (no harm to significance), 'Building heights and views; townscape' (not appropriate for tall buildings), 'Transport, movement and public realm' (standards will apply), and 'Local Plan and London Plan parking standards' (standards will apply). The page ends with a note about the replacement supermarket and a final statement about pedestrian and cyclist access.

Figure 14. Site 20: Vision Map

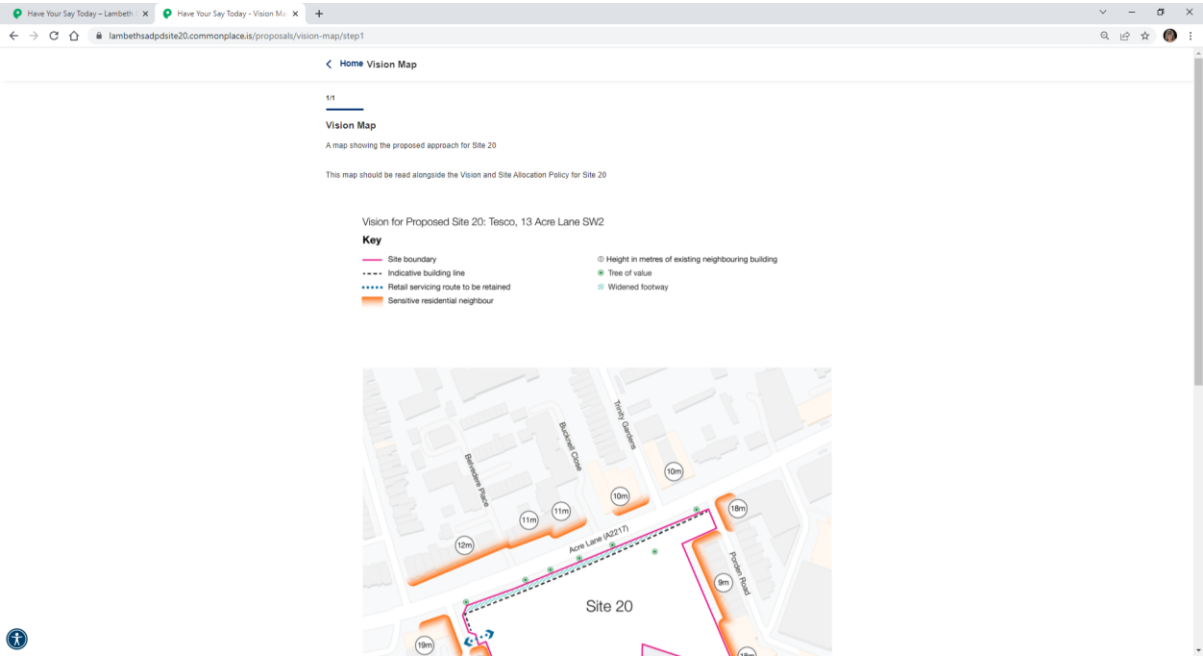


Figure 15: Site 20: Context

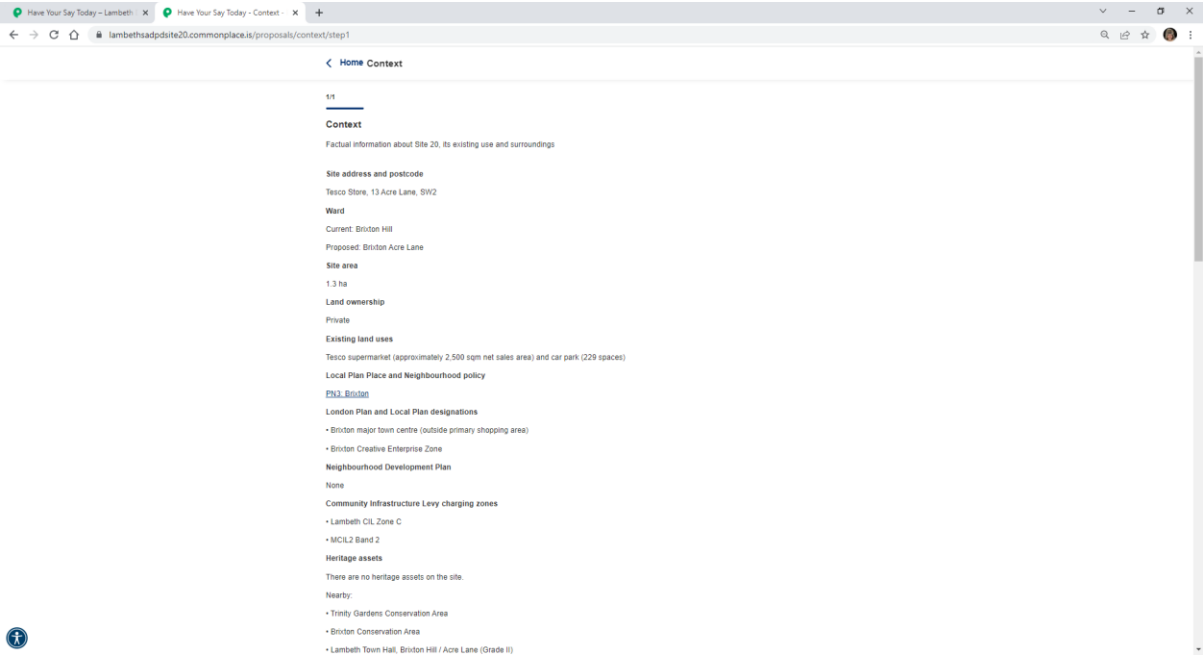


Figure 16. Site 20: Context Map

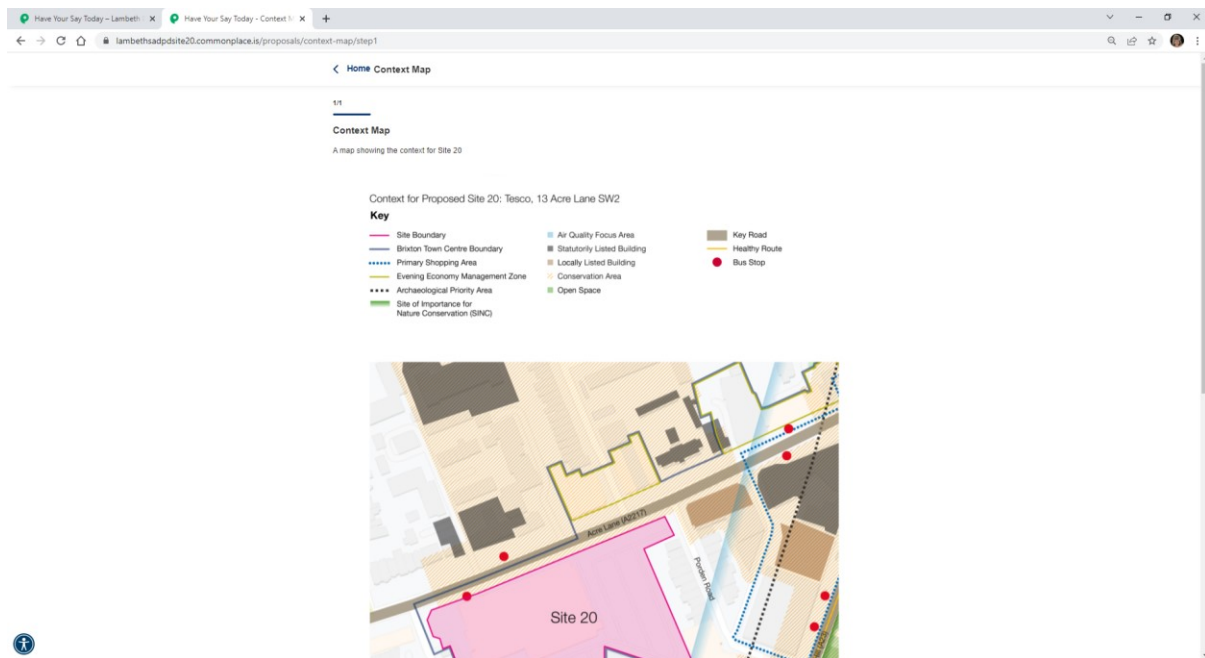


Figure 17. Site 20: Evidence

Have Your Say Today - Lambeth | Have Your Say Today - Evidence

lambethadpsite20.commonplace.is/proposals/evidence/step1

Home Evidence

Evidence

The evidence to support the proposed Site Allocation Policy for Site 20 can be found below.

[Site 20 Evidence document](#)

Do you have any comments about the Evidence for Site 20?

What is your email address?

[Back](#) [Next](#)

Figure 18. Site 20: Sustainability Appraisal

Have Your Say Today - Lambeth X Have Your Say Today - Sustain X +

← → ↻ 🏠 🔍 📄 ☆ 👤

< Home Sustainability Appraisal

1/1

Sustainability Appraisal

The Draft Sustainability Appraisal appraises the social, environmental and economic effects of the Draft Site Allocations DPD. This helps to make sure the document will contribute to sustainable development in Lambeth.

The appraisal for Site 20 can be viewed using this link:

[Draft Sustainability Appraisal for Site 20](#)

The full Draft Sustainability Appraisal, including an explanation of the process, methodology and an appraisal of reasonable alternatives for each site, can be viewed and commented on using this link:

[Draft Sustainability Appraisal for the Draft Site Allocations DPD](#)

Do you have any comments about the Sustainability Appraisal for Site 20?

📧 What is your email address?

< Back Next >

📄

APPENDIX D - SOCIAL MEDIA POST EXAMPLES

Figure 19. Example Twitter post (21st January 2022)



Figure 20. Example LinkedIn post (21st January 2022)

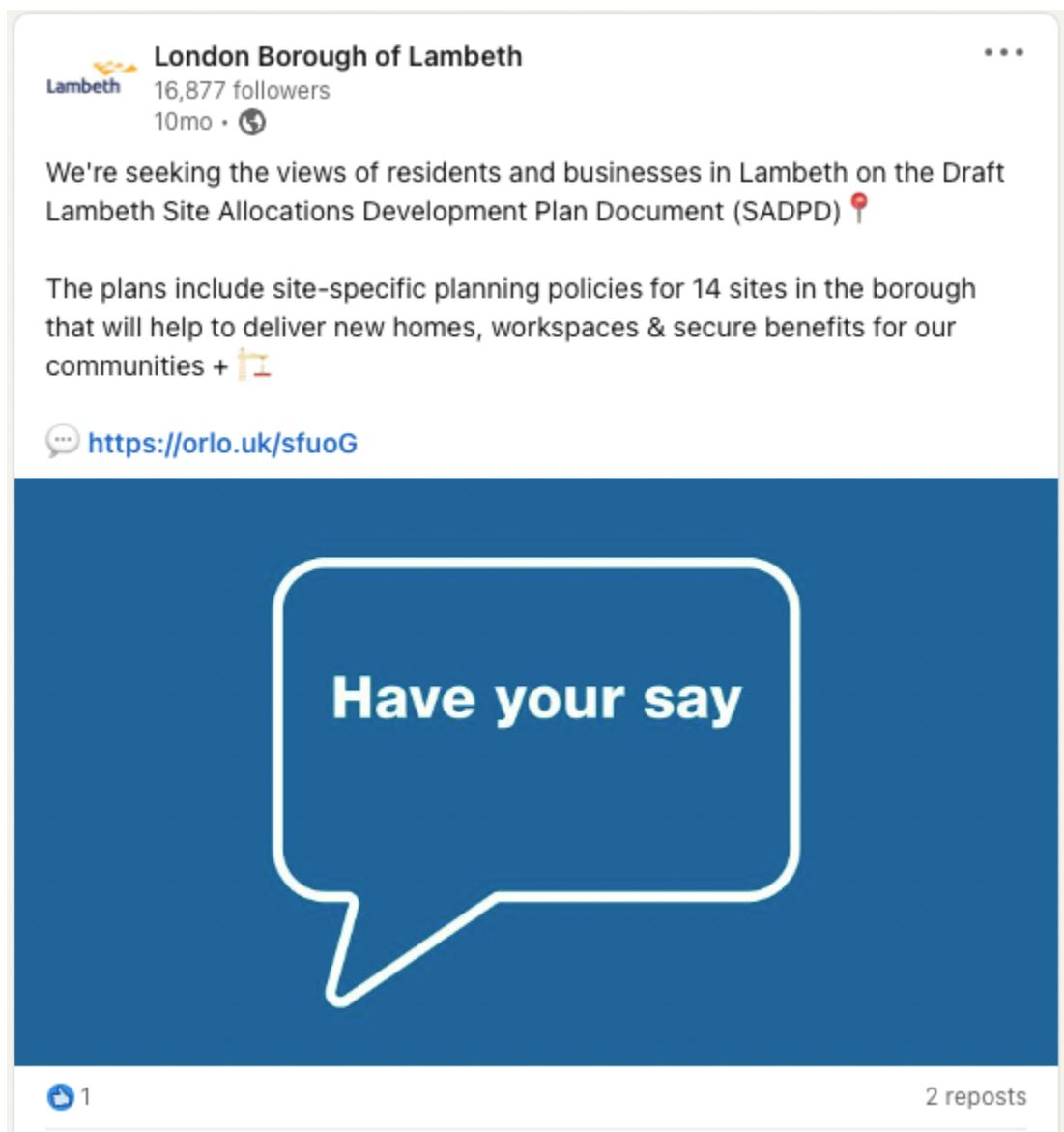
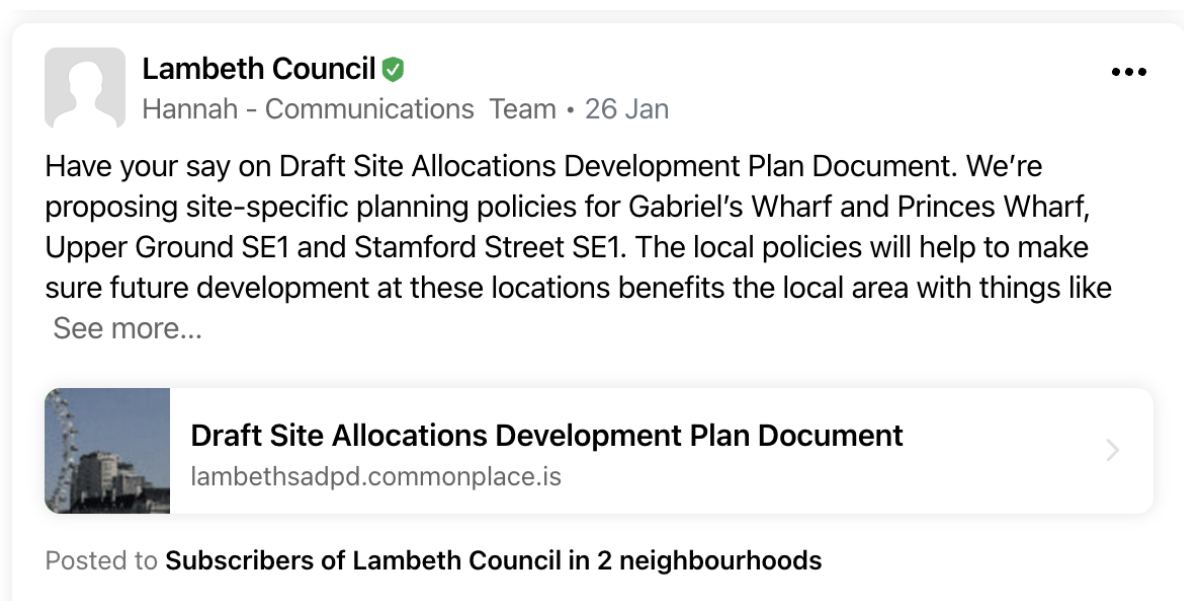


Figure 21. Example Facebook post (21st January 2022)




Figure 22. Example Nextdoor post (26th January 2022)



APPENDIX E - LOVE LAMBETH ARTICLE


Figure 23. Love Lambeth Article (Part 1)



LOVE LAMBETH
News from Lambeth Council

Select Language ▼


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Lambeth Council launches consultation into planning policy at key sites


2 February 2022
Written by: Lambeth Council
[Consultations](#) · [Housing and planning](#) · [Neighbourhoods](#) · [Sustainable growth and opportunity](#)

Lambeth Council is inviting feedback on the Draft Lambeth Site Allocations Development Plan Document (SADPD) that would shape future development at key Lambeth locations.



Latest posts

- [Lambeth tenants welcomed to their new council-built homes](#)
- [Lambeth: "Warm spaces" partnership plan to open libraries & community centres for people struggling to heat their homes](#)
- [Lambeth: Honouring the service and sacrifice of those who fought for our country](#)
- [Lambeth encourages use of dedicated reporting tool to report incidents outside abortion clinics in Lambeth](#)
- [Lambeth highlights school funding challenges to new Education Minister](#)



Lambeth Heritage Festival 2022
Get involved in events happening all throughout September!

Figure 24. Love Lambeth Article (Part 2)

The Draft SADPD would guide the future development of 14 sites in the borough to support Lambeth Council's ambitions for sustainable growth which benefits everyone, an inclusive and resilient economy, and to help tackle climate change.

The sites covered by the Draft SADPD would include major development opportunities in Streatham, Loughborough Junction, West Norwood, Brixton, Kennington, and Waterloo.

When the SADPD is adopted, it will become part of the development plan for Lambeth. Along with Lambeth Local Plan 2021, London Plan 2021 and the South Bank and Waterloo Neighbourhood Plan 2019, the Draft SADPD will help to deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth.

The council is seeking your views on the draft SADPD, which will help to shape the next draft of the document

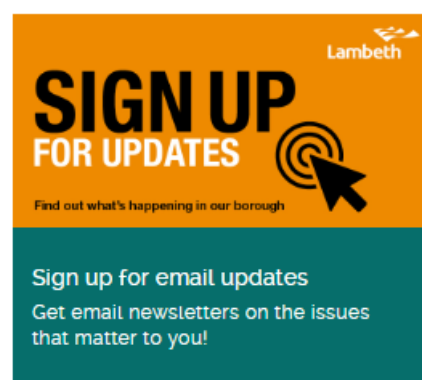
Cllr Matthew Bennett, Deputy Leader and Cabinet Member for Planning, Investment and New Homes, said: "The draft document is important as it sets out the parameters for future development on some key sites across the borough, alongside the existing adopted planning policies in the Local Plan, to help achieve the best outcomes and benefits for people in these communities.

"I would encourage people to read the draft document and give us their feedback so we can deliver a final document that will help shape the future of Lambeth in the years to come."

A [commonplace site](#) has been launched as part of the Draft SADPD consultation and comments must be submitted by 11pm on February 22.

Please visit the [Consultation page](#) to view the Draft Site Allocations DPD and to submit comments.

For additional information or questions, please contact: sadpd@lambeth.gov.uk



APPENDIX F - EXAMPLES OF NEWSLETTERS

Figure 25. Post on Lambeth Biodiversity Forum (17th January 2022)

We've launched a consultation on our Draft Site Allocations Development Plan Document

We are seeking your views on the Draft Lambeth Site Allocations Development Plan Document (SADPD). Following on from the adoption of the [Lambeth Local Plan](#) in September 2021, the Draft SADPD includes site-specific planning policies for fourteen sites in Lambeth, distributed across the borough.

Once adopted, the SADPD will become part of the statutory development plan for Lambeth. Alongside the [Lambeth Local Plan 2021](#), the [London Plan 2021](#) and the [South Bank and Waterloo Neighbourhood Plan 2019](#) and associated planning guidance, the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth.

Please visit the [Consultation page](#) to view the Draft Site Allocations DPD and to submit comments.

Comments must be received by 11pm on **22 February 2022**.

For additional information or questions, please contact: sadpd@lambeth.gov.uk

Figure 26. Post on Lambeth First (18th January 2022)

We've launched a consultation on our Draft Site Allocations Development Plan Document

We are seeking your views on the Draft Lambeth Site Allocations Development Plan Document (SADPD). Following on from the adoption of the [Lambeth Local Plan](#) in September 2021, the Draft SADPD includes site-specific planning policies for fourteen sites in Lambeth, distributed across the borough.

Once adopted, the SADPD will become part of the statutory development plan for Lambeth. Alongside the [Lambeth Local Plan 2021](#), the [London Plan 2021](#) and the [South Bank and Waterloo Neighbourhood Plan 2019](#) and associated planning guidance, the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth.

The consultation will run from 10 January to 21 February 2022.

Please visit the [Consultation page](#) to view the Draft Site Allocations DPD and to submit comments.

Comments must be received by 11pm on **21 February 2022**.

This consultation is in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

For additional information or questions, please contact: sadpd@lambeth.gov.uk

Lambeth Council is committed to protecting your privacy. Find out more by [reading our privacy notice](#).

Figure 27. Post on Lambeth School Partnership

Consultation: Draft Site Allocations Development Plan Document (SADPD)



Following on from the adoption of the [Lambeth Local Plan](#) in September 2021, the Draft SADPD includes site-specific planning policies for fourteen sites in Lambeth, distributed across the borough.

[Give Your Feedback Here](#)

Figure 28. Post on Lambeth 500 (24th January 2022)

Lambeth 500 - Draft Site Allocation Development Plan consultation

Hi Lambeth 500 Member

Draft Site Allocations Development Plan Document

We are seeking your views on the Draft Lambeth Site Allocations Development Plan Document (SADPD). Following on from the adoption of the [Lambeth Local Plan](#) in September 2021, the Draft SADPD includes site-specific planning policies for fourteen sites in Lambeth, distributed across the borough.

Once adopted, the SADPD will become part of the statutory development plan for Lambeth. Alongside the [Lambeth Local Plan 2021](#), the [London Plan 2021](#) and the [South Bank and Waterloo Neighbourhood Plan 2019](#) and associated planning guidance, the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth.

Please visit the [consultation page](#) to view the Draft Site Allocations DPD and to submit comments.

Comments must be received by 11pm on 22 February 2022.

For additional information or questions, please contact sadpd@lambeth.gov.uk

Figure 29. Email to Youth and Play (28th January 2022)

Are you aged 14-18 and interested in shaping the future of your neighbourhood?
Wondering how to gain some work experience over half term?

ZCD Architects and Lambeth Council are running some walkabout sessions during half term week in Brixton, Waterloo and West Norwood for people aged 14-18. We want to find out what you think of your neighbourhood, as well as our plans to build new homes and other new places to hang out. It will also involve discussion sessions with architects to reflect on your ideas for the local neighbourhoods.

If you want to find out more, please send an email to: sadpd@lambeth.gov.uk

All participants will be paid with a £20 gift voucher!

Sat 12th Feb

Waterloo -

Mon 14th Feb

10-12pm - Brixton

2-4pm - Norwood

Please get in touch or send to other interested organisations in your local areas!

Figure 30. Post on Lambeth Climate Action, Clean Transport and Sustainability News (3rd February 2022)

Consultations

Have your say on Lambeth's major developments

We are seeking your views on the Draft Lambeth **Site Allocations Development Plan Document (SADPD)**.

Following on from the adoption of the [Lambeth Local Plan](#) in September 2021, the Draft SADPD includes planning policies for 14 sites in Lambeth.



Once adopted, the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth.

Comments must be received by 11pm on **22 February 2022**.

Have your say

Figure 32. Coldharbour Community Early Help Update (9th February)

Information and consultations...

- **Consultation – have your say in planning for Lambeth's building and development** – Lambeth are seeking your views on the Draft Lambeth Site Allocations Development Plan Document (SADPD). Following on from the adoption of the [Lambeth Local Plan](#) in September 2021, the Draft SADPD includes site-specific planning policies for fourteen sites in Lambeth, distributed across the borough. Once adopted, the SADPD will become part of the statutory development plan for Lambeth. Alongside the [Lambeth Local Plan 2021](#), the [London Plan 2021](#) and the [South Bank and Waterloo Neighbourhood Plan 2019](#) and associated planning guidance, the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth. Please visit the [Consultation page](#) to view the Draft Site Allocations DPD and to submit comments. Comments must be received by 11pm on **22 February 2022**. For additional information or questions, please contact: sadpd@lambeth.gov.uk

APPENDIX G – INTEGRATE NOTIFICATION EMAIL

Figure 31. Integrate notification email (13th January 2022)



**Lambeth Council has launched a consultation on a
Draft Site Allocations Development Plan Document
DEADLINE 11pm, 22 February 2022**

Lambeth Council are seeking your views on the Draft Lambeth Site Allocations Development Plan Document (SADPD). Following on from the adoption of the Lambeth Local Plan in September 2021, the Draft SADPD includes proposed site-specific planning policies for fourteen sites in Lambeth, distributed across the borough.

Once adopted, the SADPD will become part of the statutory development plan for Lambeth. Alongside the Lambeth Local Plan 2021, the London Plan 2021 and the South Bank and Waterloo Neighbourhood Plan 2019 and associated planning guidance, the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth.

Please visit the Consultation page to view the Draft Site Allocations DPD and to submit comments via the link below.

Comments must be received by **11pm on 22 February 2022**

For additional information or questions, please contact: sadpd@lambeth.gov.uk

Have your say

APPENDIX H - WEBPAGE SCREENSHOT EXAMPLES

Figure 33. Screenshot 1 of Draft SADPD consultation dedicated webpage

Lambeth Council services * Your community Pay it Coronavirus Log in to mylambeth Search

Consultations

Help improve this site by giving your [feedback](#)

[Home](#) > [Consultations](#) > Have your say on the Draft Site Allocations Development Plan Document

Have your say on the Draft Site Allocations Development Plan Document

We are seeking your views on the Draft Lambeth Site Allocations Development Plan Document (SADPD). You can have your say by visiting our Commonplace site, send comments by email or by post. The consultation runs from 10 January to 22 February 2022.

Open date:
Monday, 10 January 2022 at 3.00pm

Close date:
Tuesday, 22 February 2022 at 11.00pm

Type:
Consultation

Neighbourhood:
Lambeth wide

Category:
Planning and building control

Email
sadpd@lambeth.gov.uk

Figure 34. Screenshot 2 of Draft SADPD consultation dedicated website

We are seeking your views on the Draft Lambeth Site Allocations Development Plan Document (SADPD). Following on from the adoption of the [Lambeth Local Plan](#) in September 2021, the Draft SADPD includes site-specific planning policies for fourteen sites in Lambeth, distributed across the borough.

Once adopted, the SADPD will become part of the statutory development plan for Lambeth. Alongside the [Lambeth Local Plan 2021](#), the [London Plan 2021](#) and the [South Bank and Waterloo Neighbourhood Plan 2019](#) and associated planning guidance, the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth.

You can also comment on the evidence that has informed the Draft SADPD. This includes a Draft Sustainability Appraisal.

This consultation is in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

How to respond

To view the Draft SADPD and submit comments, please visit:

Lambeth Draft SADPD Commonplace site →

You can also submit comments by email:

sadpd@lambeth.gov.uk

By post:

Lambeth Council
Planning Policy and Strategy
PO Box 734
Winchester
SO23 5DG

Copies of the draft DPD and Sustainability Appraisal are available to view any Lambeth library during normal opening hours or at the Lambeth Civic Centre (by appointment, by emailing sadpd@lambeth.gov.uk).

This consultation is in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Lambeth Council is committed to protecting your privacy. Find out more by [reading our privacy notice](#).

APPENDIX I - YOUTH WORKSHOP REPORT

Figure 35. Screenshot 1 of Youth Workshop report prepared by ZCD Architects

ZCD's approach to engagement with children and young people is about listening to and hearing what they tell us about their local spaces and places, in particular through discussions about their lived experiences. Our processes are designed to work on children's own terms, we go to them, and include involvement from the local authorities and design teams so that they can hear first hand what matters to children and young people in their local area.

The techniques that we use draw on children and young people's knowledge as local experts and focus not on what they 'like' or 'don't like', but rather on how they feel about places, where they have agency and control, and how this relates to their sense of happiness and well-being. Through working in this way we can also teach children and young people how to analyse the spaces that they know, which then helps them to begin to look at proposals for their local areas.

Using survey worksheets, we asked the young people to rate each of the spaces we visited on the walking tour according to the RAG system both during the day and after dark for different age groups. The results are displayed in the graphs on the following pages. A green space is a place where you feel safe and totally free to do what you want, where there are very few rules. An amber space is a place where they might be safe to play or hang out but there are some rules. There might be signs, support from adults or other people telling you what to do. A red space is a place where there are lots of restrictions, or it might be somewhere that feels dangerous or unsafe.

ZCD carried out three sessions with three separate groups of young people, in Waterloo, Brixton and Lambeth during February half term 2022.

The aim of the sessions was to introduce Lambeth's Site Allocations Development Plan Document to the young people and to focus particularly on the elements associated with 1.17: Places and neighbourhoods: inclusion, accessibility and permeability in the public realm; healthy routes and active travel; community safety; townscape.

We used our RAG system to look at local spaces close to the allocated sites. The RAG system works well in terms of the above elements in 1.17. Each young person filled in a worksheet and talked about the particular sites.

This report brings together the results of the worksheets (as charts), quotes from the young people and includes notes taken during the session, by Dinah Bornat and China Chapman from ZCD Architects.

**Lambeth Site Allocation
DPD**

**Children and Youth
Engagement**

ZCD Architects 2022

Figure 36. Screenshot 2 of Youth Workshop report prepared by ZCD Architects

2 Lambeth Sites Allocation DPD

1.0 Waterloo

Notes and Chart Summary

Which outdoor spaces would you rate as a 'green' space?

Lower Marsh, South Bank, Jubilee Gardens, Black Prince Court.

General comments:

Two of the young people cycle and some do not live in the area.

Most walk through but do not stop at Bernie Spain Gardens.

'South Bank is a place to hang out with your friends, not to eat'

They would like:

Open spaces to chill

Swings and places to sit (with a shelter)

They are not so keen on fitness equipment

Park next to Coin Street

They noticed that there were a large variety of different people there.

'Calm and peaceful'

'I have never been here before'

'I walk past here but I didn't realise it existed'

'Looks like a place to chill'

Gabriel's Wharf/Southbank

'Quite busy with a lot of people moving around'

'There's lots of young people around'

'More of a tourist area'

The Imax tunnel

Scored mostly green for young people who regularly walk through.

'It's very unpleasant and a bit dirty'

'It feels safe but there's not enough to do'

'Feels empty, abandoned and hidden'

'Plain, it feels closed off like I'm not supposed to be here'

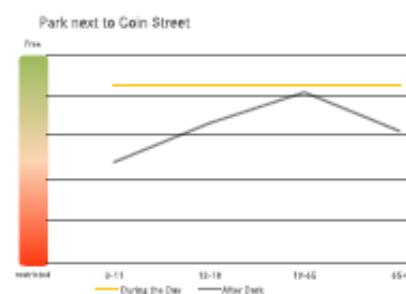


Figure 37. Screenshot 3 of Youth Workshop report prepared by ZCD Architects

3

Waterloo High Street

'Moving/ active people traveling to and from the station. Which could feel overwhelming'

'Around rush hour like 6pm there's so much traffic here, it's not as nice as it is this morning'

'Too many pubs, so after dark there are too many drunk people'

'I like it after dark because there are lots of people around and there's a good vibe'

RAG ratings chart summary

The park next to Coin Street scored highly during the day, for all age groups. It was seen as peaceful. It was new to some of the group who hadn't been there before.

South Bank/Oxo Tower scored the highest during the day and after dark. They appreciated it for being well connected.

As is often the case, young people perceive most spaces to be more 'green' or give a higher score for adults, than for their own age group. The only instance where this is not the case is for the park next to Coin Street which they scored the same way, during they day, for all age groups. That would indicate they see it as a more inclusive space.

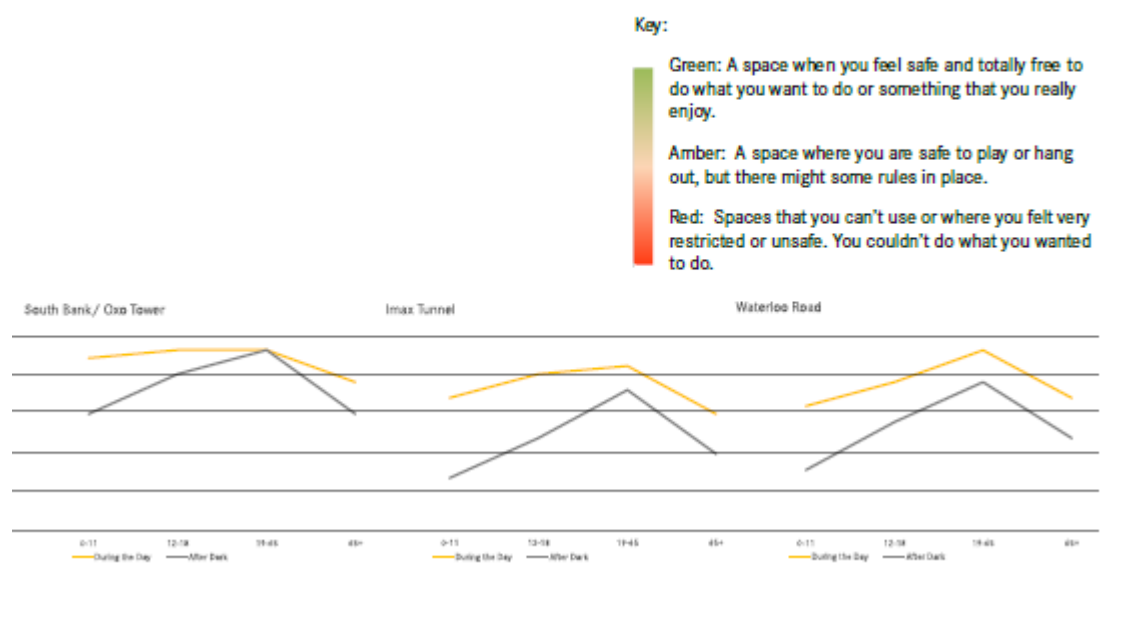


Figure 38. Screenshot 4 of Youth Workshop report prepared by ZCD Architects

4 Lambeth Sites Allocation DPD

2.0 Brixton

Notes and Chart Summary

Which outdoor spaces would you rate as a 'green' space?

Loughborough Park, Brockwell park, Slade Gardens

About traveling around:

We talked about using electric scooters - 10 young people said they liked to travel with electric scooters

'Using electric scooters in big parks is okay but not in small parks when there are little kids around'

General comments:

Young people know Rush Common and walk through the space but do not go there often.

Rush Common

'Nice green space with benches and trees'

'You could sit down'

'There are young children, they could play'

'I can see people playing with family'

Effra Road Retail Park

Limited green space

'It doesn't represent anything, a bit off '

'People of all ages go to the retail park but no one goes on the green space next to the road'

'There are strangers here'

'I would have more African food shops and restaurants here'

Tescos & Car park

'Nowhere to sit'

'Limited space on the pavement'

'I would use a car to get here or bus'

'There should be a mall filled with sweets and clothing shops'

'I can get the bus 432 that goes here'

Figure 39. Screenshot 5 of Youth Workshop report prepared by ZCD Architects

5

RAG ratings chart Summary

All three spaces are near to main roads, the group scored them quite low with mostly amber and red rating.

Rush Common scored the highest for the 12-18 age group. The group also scored Rush Common higher for the 0-11 age group than 12-18. Tesco's scored higher for the adult age group.

Unusually, Effra Road scored slightly higher after dark than in the day for the 12-18 age group. The group did not see any use for the green patch next to the road but would visit the retail park with parents and guardians by car or bus.

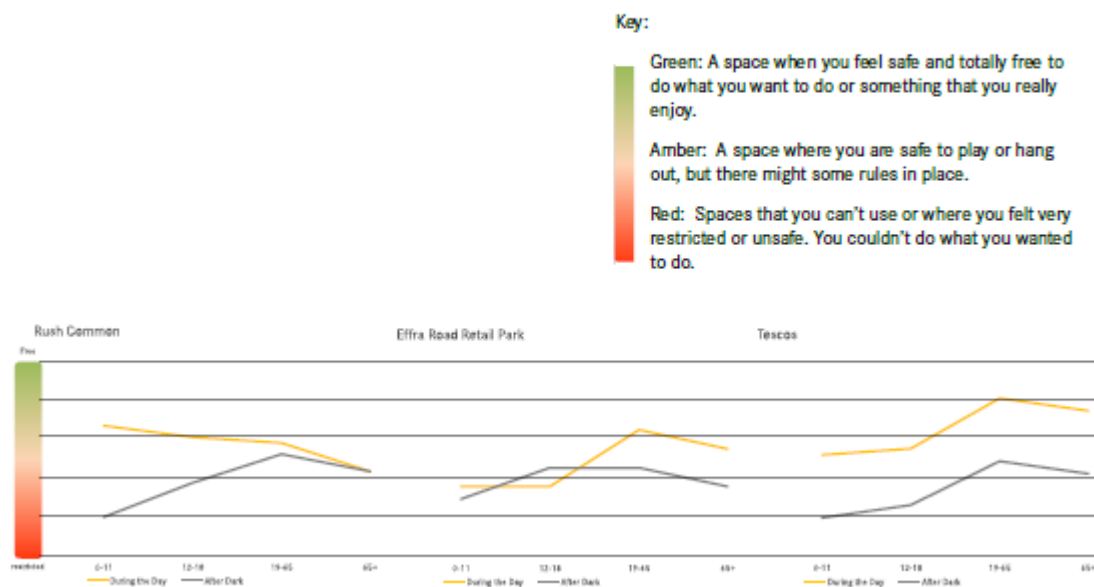


Figure 40. Screenshot 6 of Youth Workshop report prepared by ZCD Architects

6 Lambeth Sites Allocation DPD

3.0 West Norwood

Notes and Chart Summary

Which outdoor spaces would you rate as a 'green' space?

Norwood Park

'You can do what you want there like play football'

'There's not a lot to do there, it's underused and rundown'

'There's a playground area, skatepark and smaller pitch'

Van Gogh Walk

'Well utilised and stops cars'

Battersea Park

'Easy to get to by car or train'

'It has lots of things to do like Go Ape, golf, bikes to ride around'

Tulse Hill Adventure Playground

General comments

We need more Santander bikes in West Norwood in general.

Having eco-friendly transport

More affordable food places

Places for young people to hang out

Dunbar Cage

Two of the group live near the cage and come here often to play without parents/ guardians (the first five comments below). They had more positive feelings about the space and were undeterred by other people/ASB. Other members of the group reacted in a more negative way.

'I live near here so I know the neighbours and feel safe to hang out and play.'

'The adults who use the spaces leave us alone to play and hang out'

'People on drugs and gangs hang out around here.'

'I don't really feel safe because of the adults doing illegal things but I still play here'

'I grew up around here and the stuff I see, some good and some bad'

It feels cramped, dirty and broken

'Run down'

'Not great for accessibility with the stairs up to play equipment'

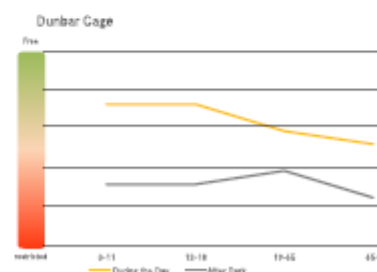


Figure 41. Screenshot 7 of Youth Workshop report prepared by ZCD Architects

7

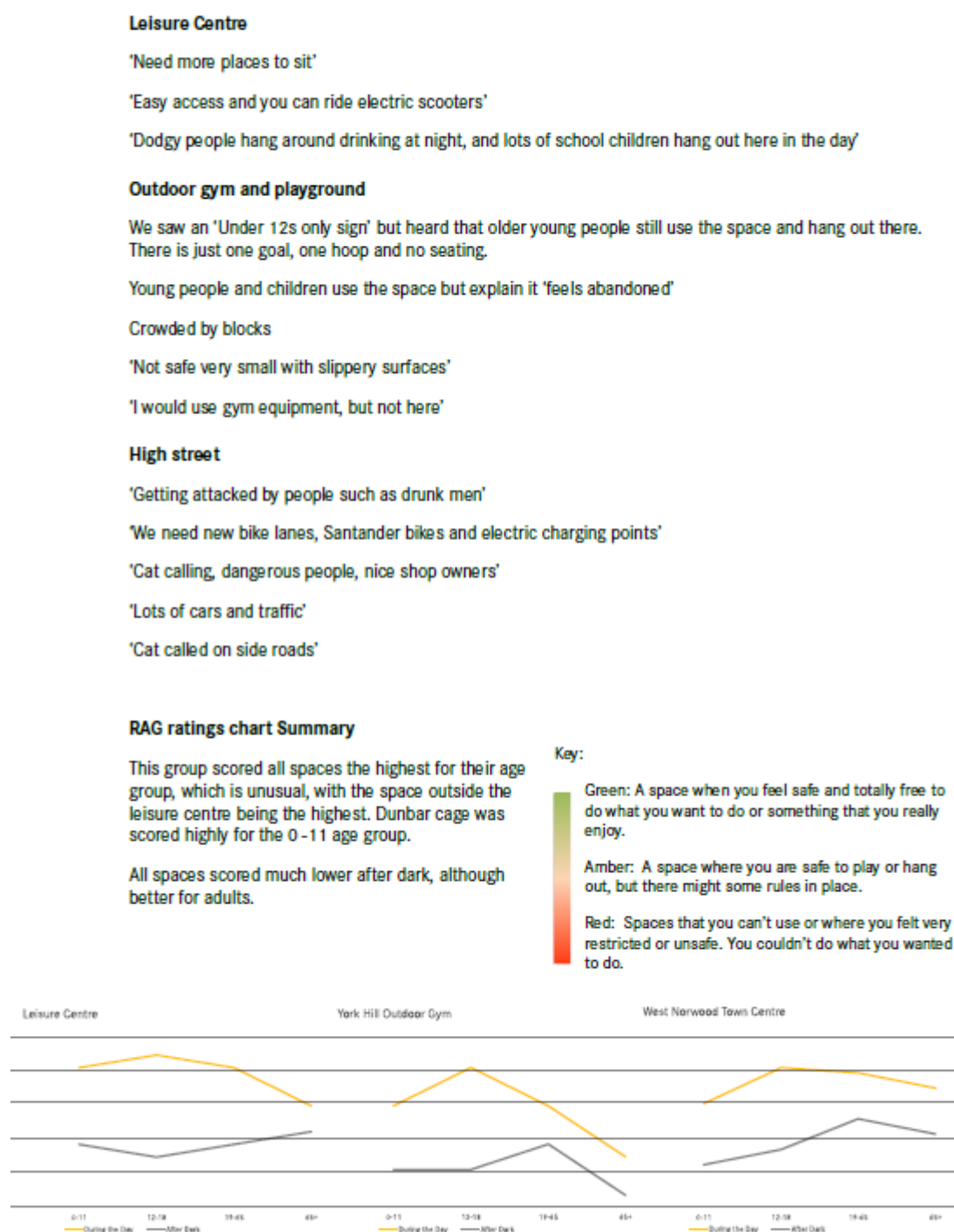


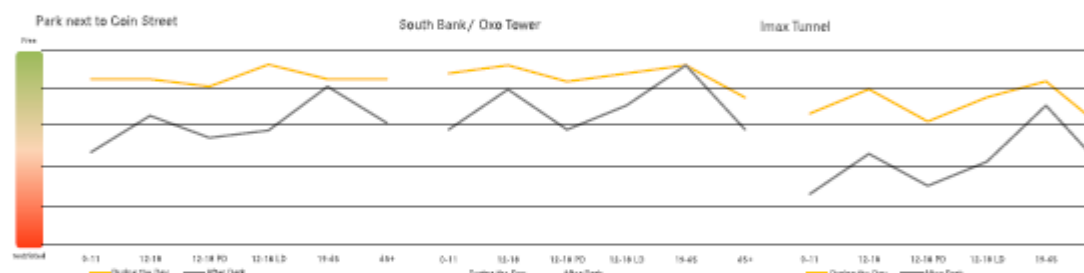
Figure 42. Screenshot 8 of Youth Workshop report prepared by ZCD Architects

8 Lambeth Sites Allocation DPD

4.0 RAG rating charts

Appendix - full charts with disability ranking included

Waterloo



Brixton



West Norwood

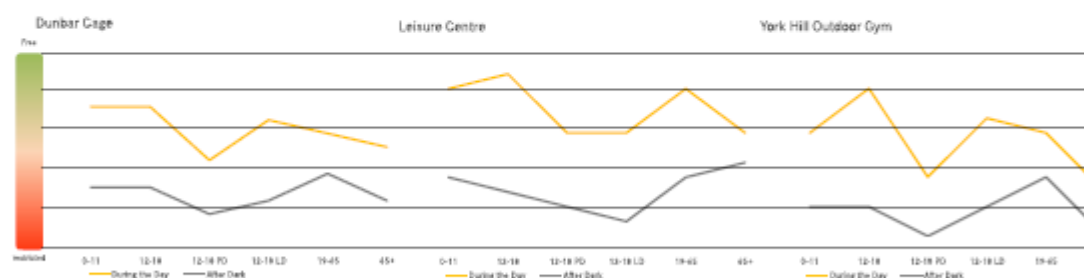
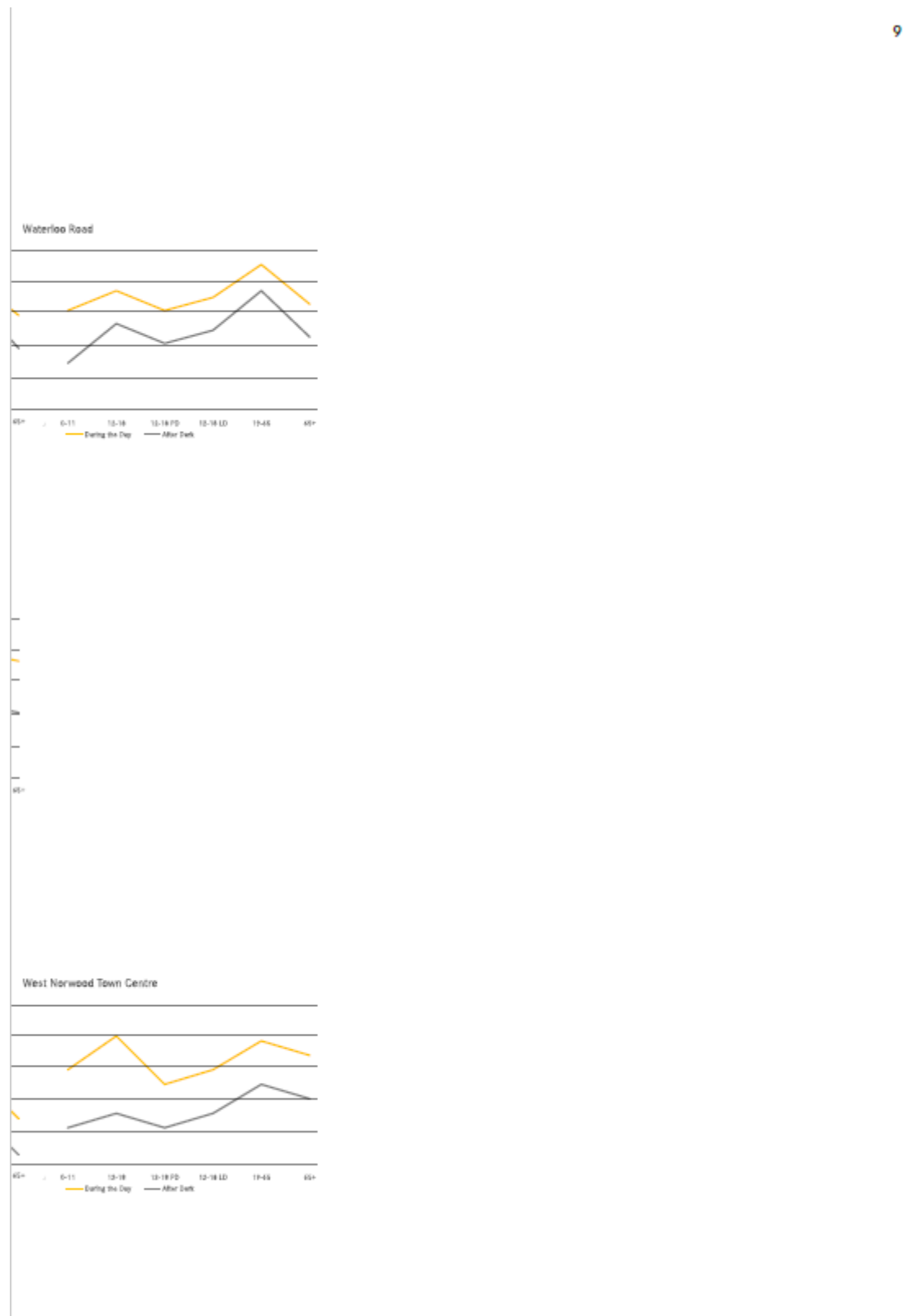


Figure 43. Screenshot 9 of Youth Workshop report prepared by ZCD Architects



APPENDIX J – OFFICER RESPONSE TO REG 18 REPRESENTATIONS REGARDING ADDITIONAL SITES

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
Savills on behalf of Notting Hill Genesis	R0137	Rear of 49-67 (odd) Sudbourne Road, London, SW2 5TN	<p>We are instructed by Notting Hill Genesis (NHG) to submit representations in response to the Draft Lambeth Site Allocations Development Plan Document (Regulation 18 Consultation Draft), dated January 2022.</p> <p>Notting Hill Home Ownership Ltd (Subsidiary of NHG) own the Site at the rear of 49-67 (odd) Sudbourne Road as illustrated in Appendix 1 ("the Site"). The Site, situated off Acre Lane, Brixton, is an accessible and sustainable brownfield site which provides redevelopment potential and we consider it could deliver significant levels of new residential uses, including affordable housing. On this basis, it is considered to be a valuable site which should be included in the Lambeth Site Allocations Development Plan Document.</p> <p>Notting Hill Genesis</p> <p>NHG are a non-profit housing developer, member of the G15 group of major London housing associations and a registered provider of social housing. NHG own and manage more than 65,000 homes in London and the southeast. NHG work in the community, providing homes for around 170,000 people along with social programmes, economic regeneration initiatives and services and support residents' needs. A significant number of these homes are in Lambeth, which are a mixture of: care and support; general needs; intermediate tenures; and temporary housing. NHG are keen to extend their reach within Lambeth and help the Council deliver their strategic goals and housing targets.</p> <p>NHG's primary purpose is to provide homes for lower-income households in and around London. NHG have a record of strategic regeneration across London to deliver high quality market and affordable housing. NHG excel in creating high quality new homes and provide a wide range of housing solutions, working closely with residents and partners to meet local needs.</p> <p>Background</p> <p>The Site measures approximately 0.35 hectares in size on the southern side of Acre Lane, Brixton within London Borough of Lambeth (LBL) and currently comprises of 3 disused and dilapidated warehouse type buildings of two storey height which have been vacant for a long-term period of at least 18 years.</p> <p>The Site is situated between business premises at 41-45 Acre Lane (a mixed use commercial buildings comprising a café, charity stores and studios on the upper levels) to the north-east, behind a disused and cleared petrol filling station site to the north (47-49 Acre Lane), which now forms part of the adjoining building/timber merchants (Acre Lane Building and Timber Merchants) at 53-55 Acre Lane. The Site is an area of backland behind properties on Sudbourne Road and the timber merchant yard, which fronts onto Acre Lane.</p> <p>The residential properties along Sudbourne Road (to the south of the Site) and Baytree Road (to the east of the Site) are predominantly late 19th Century 2-3 storey terraced</p>	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.</p>

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>dwellinghouses and flat conversions. The existing mixed use commercial building at 41-45 Acre Lane is two storeys in height and occupies most of the site with open service areas at the front and rear of the building. It should be noted that this adjacent site at 41-45 Acre Lane has been granted planning permission by LBL (ref. 17/03846/FUL) for a part four and part five storey building with a basement level to provide 613sqm of office space (Use Class E), 22 self-contained residential flats and 2 dwelling houses (C3 Use Class); this development is currently under construction.</p> <p>The Site has a Public Transport Accessibility Level (PTAL) of '6a' which is considered 'excellent' and is within short walking distance of the Brixton Underground and Overground train stations (within the Brixton Major Town Centre) and a number of bus services along Acre Lane and in the town centre which service wider London.</p> <p>The Site is subject to the following adopted planning policy designations according to LBL's Policies Map (adopted in September 2021):</p> <ul style="list-style-type: none"> • Forms part of the Brixton Creative Enterprise Zone; • Adjacent to Key Industrial Business Area (KIBA) designation at 53 – 57 Acre Lane; • PTAL 6a; • Flood Zone 1; and • The Site is not listed (locally or statutorily) and is not located within a Conservation Area. <p>However, the Site is within the wider context of a number of heritage assets, including the Trinity Gardens and Brixton Conservation Areas and a number of listed buildings along Acre Lane.</p> <p>The Site has an extensive planning history, which is set out in Appendix B. Of significant relevance is application ref. 10/04260/FUL, which was allowed at appeal for the redevelopment of the Site to provide 21 self-contained flats and 7 houses. Whilst none of the historical permissions were implemented, they nonetheless provide useful background and planning precedent with regard to the principle of redevelopment of the Site for alternative uses, including the Site's suitability for residential use. As a result of none of these applications being implemented, the Site has laid vacant for over 18 years in a dilapidated condition that continues to decline due to ongoing vacancy/disuse of the Site.</p> <p>Positive pre-application discussions with LBL for a residential scheme at the Site are ongoing. As part of the pre-application process, details and evidence were submitted against the four main factor test relevant to assessing the abandonment of use (set out in the appeal decision of <i>Castell-y-Mynach Estate v Secretary of State for Wales</i> (1985) (appeal ref. JPL 40)). The Council confirmed via formal pre-application response (ref. 20/04205/PREAPP) that the prior use of the Site (Use Class B8) is considered to have been abandoned. As such, the Site is now deemed to have a 'nil' existing use and should no longer be considered a 'non designated industrial site' in planning terms.</p> <p>A Prior Approval application is expected to be submitted to the Council imminently under the</p>	

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>Town and Country Planning (General Permitted Development) Order (“GPDO”) 2015 (as amended) Schedule 2, Part 11, Class B to determine whether the prior approval of the Council is needed as to the method of demolition. Subject to the above, demolition is anticipated to commence in March 2022, reinforcing the commitment of NHG in seeking to provide a deliverable high quality residential scheme on this Site.</p> <p>Draft Lambeth Site Allocations Development Plan Document (Regulation 18 Consultation Draft) – representations</p> <p>Previous Site Allocation</p> <p>The superseded Lambeth Local Plan (2015) allocated the Site as ‘Site 2’ for educational purpose development, which previously was to allow for the extension of nearby Sudbourne Primary School on to this Site. The school extension has however, been granted permission under application ref: 18/04964/RG3 to locate to a differing site, 21 Mandrell Road, and this permission is currently being implemented. Subsequently, the Draft Lambeth Site Allocations Development Plan Document has deleted the site allocation as a school and as such, the Site no longer has any site-specific designation.</p> <p>Whilst we fully support the deletion of the Site’s allocation as a school, we do not agree with the Site’s omission from the Draft Lambeth Site Allocations Development Plan Document considering the Site’s sustainable brownfield location and redevelopment potential to deliver new residential uses, including affordable housing. This is set out in further detail below.</p> <p>Development Potential</p> <p>At the national level, Section 11 (paragraphs 119-123) of the National Planning Policy Framework (July 2021) requires local authorities to give substantial weight to the value of using suitable brownfield land for homes and other identified needs. The London Plan Policy GG2 (Making best use of land) sets out that that growth will be supported across all parts of London to ensure it addresses the need for development, regeneration and social and economic convergence and those involved in planning must enable the development of brownfield land to assist in meeting these said objectives. This is reflected within LBL Local Plan Policy 1 which sets out the need to optimise the delivery of housing on brownfield sites. The London Plan requires the delivery of 52,287 net additional homes across London per annum (Table 4.1). In LBL, this equates to a minimum need for 13,350 dwellings throughout the plan period (2019/20 to 2028/29), equating to 1,335 dwellings per annum. This is reflected in LBL’s Local Plan Policy H1 which sets out that the Council will ensure that the London Plan minimum ten-year housing target is met and exceeded. It is important to highlight that the Standard Methodology Housing Need (published 16 December 2020 by MHCLG) outlines a considerably higher local housing need in LBL of 2,259 new homes per annum.</p> <p>The Site offers a prime opportunity to provide high quality homes including affordable housing</p>	

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>to help meet both London and LBL's ambitious housing targets in an accessible location on brownfield land. Positive preapplication discussions with LBL for a residential scheme at the Site are ongoing. The current indicative proposals involve a comprehensive redevelopment of the Site involving the erection of 2 buildings of up to 5 storeys in height comprising of approximately 50 new residential dwellings including affordable housing along with landscaping, private and communal amenity spaces, children's playspace, accessible car parking, cycle parking facilities, refuse and recycling facilities and other associated works on the Site.</p> <p>The proposed development could provide a wide range of key planning and regeneration benefits for the Site and the surrounding area, including:</p> <ul style="list-style-type: none"> • The redevelopment and optimisation of a dilapidated and disused brownfield Site, in a highly sustainable location, that has laid vacant for over 18 years; • The delivery of a contextually appropriate mix of approximately 50 residential dwellings to assist LBL in meeting the current and future housing needs of the Borough; • Delivery of affordable homes, contributing toward the affordable housing targets for both LBL and London; • High-quality, tenure neutral, residential accommodation, amenity spaces, landscaping and children's playspace in accordance with all relevant policy and guidance; • compliance with the Mayor of London's residential standards and be provided with private amenity space; • The design of the proposed scheme had evolved through analysis of the Site and surrounding area and is considered to complement the existing built environment, which is an area of transition and redevelopment and preserve the setting of any nearby heritage assets; • High quality architectural design and public realm which would seek to provide an attractive and safe place for people to live and visit; • Promotion of sustainable transport through a 'car-free' development (with the exception of required Blue Badge spaces) and provision of secure cycle parking provisions and excellent access to public transport services; and • Generation of a range of financial and/or other contributions and benefits including, but not limited to, Community Infrastructure Levy (CIL). <p>The Site is an accessible and sustainable brownfield site which provides redevelopment potential and we consider it could deliver significant levels of new residential uses, including affordable housing which would contribute to the ambitious housing and affordable housing targets of LBL and London. The indicative preapplication proposals are considered to provide a distinct and high quality development that optimises its development potential whilst delivering a sustainable form of development and a multitude of public and planning benefits. In light of the above and in our view, we consider there is a compelling case for the allocation</p>	

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			<p>of the Site for residential land use within the Draft Lambeth Site Allocations Development Plan Document. Moreover, the inclusion of the Site will ensure that the draft Local Plan is effective and deliverable.</p> <p>Conclusion</p> <p>These representations highlight that the Site at 49-67 (odd) Sudbourne Road provides significant redevelopment opportunities to optimise this vacant, accessible and brownfield Site for residential use (including affordable) and deliver significant public and planning benefits. For the reasons outlined above, we would respectfully request that the Draft Lambeth Site Allocations Development Plan Document be amended to include a new residential site allocation at 47-49 Acre Lane with potential to accommodate approximately 50 residential units.</p> <p>We would be delighted to meet with officers and other relevant parties to continue our ongoing discussions.</p> <p>Please do not hesitate to contact [redacted] to arrange a meeting, and/or if you have any other further queries.</p> <p>[Attached: Appendix A – Site Location Plan and Appendix B – Relevant Planning History of the Site]</p>	
Rolfe Judd on behalf of Union Jack Club	R0530	Union Jack Club, Sandell Street, London, SE1 8UJ	<p>We write on behalf of our client, the Union Jack Club (UJC), to make representations to the London Borough of Lambeth (hereafter referred to as the Council) on the Draft Lambeth Site Allocations Development Plan Document currently under consultation.</p> <p>Introduction</p> <p>The UJC are freehold owners of a 0.34 hectare site directly adjacent to Waterloo Station and bounded by Sandell Street to the north, Cornwall Road to the east and Waterloo Road to the west (see Figure 1 overleaf). The UJC have occupied their current site since 1904 and are therefore deep rooted as a much-loved institution within Lambeth, and Waterloo specifically, providing essential accommodation and recreational facilities to serving and former members of the Armed Forces and their families.</p> <p>The UJC is fully supportive of the draft SADPD's overarching objective to unlock investment in the borough through the mechanism of site-specific planning policy. However, the UJC feel that a substantial opportunity for co-ordinated regeneration and good placemaking is being missed by the non-allocation of the wider 0.7 hectare landholding bounded by Sandell Street, Cornwall Road, Waterloo Road and The Cut (historically referenced by the Council as the 'Waterloo Triangle' site – See Figure 1 overleaf).</p> <p>The UJC is cognisant of the fact that their existing facility is nearing the end of its useable lifespan and will need substantial financial investment to ensure it continues to provide high quality accommodation and services for its members. Consequently, the UJC have been</p>	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.</p>

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>exploring options to relocate to a purpose-built facility within Lambeth, ideally remaining in Waterloo, which would be funded by the comprehensive redevelopment of the existing site for alternative uses.</p> <p>The UJC have met, and will continue to meet in the coming months, with Council planning officers to discuss potential redevelopment options for their site as part of a cohesive masterplan for the Waterloo Triangle site.</p> <p>[Site plan]</p> <p>Alongside this process, we have been made aware that the owners of the central portion of the Waterloo Triangle site to the south, Bourne Capital, are currently engaged in detailed pre-application discussions with the Council regarding the redevelopment of their site as an office-led mixed-use scheme. Although the Council have encouraged discussions between Bourne Capital and the UJC to ensure a co-ordinated approach to development, this has been hampered by the absence of local policy guidance.</p> <p>It is within this live context of landowner activity that the UJC wishes to work proactively with the Council and adjoining landowners to achieve a co-ordinated approach to redevelopment of the Waterloo Triangle site in the short to medium term. We would compel the Council to recognise the emerging Site Allocations DPD as a once-in-a-lifetime opportunity to maximise the potential of this strategically important site, adjacent to one of the largest transport hubs in the country, to deliver on many of the key objectives of Policy PN1 (Waterloo and South Bank) of the Lambeth Local Plan 2021.</p> <p>The Union Jack Club</p> <p>The Union Jack Club (the Club) is a national institution and established Charity, with Her Majesty The Queen as patron. Founded on its current site in 1904, the Club has provided unbroken service to enlisted military personnel; currently with all Serving enlisted members of Her Majesty's Armed Forces and over 26,000 veterans as members; through two world wars and countless campaigns.</p> <p>[photos of club]</p> <p>The Club provides a 'home from home' for many members and their families, offering 261 bedrooms along with a restaurant, bar, small library and function rooms and the home of the only Victoria Cross (VC) and George Cross (GC) Roll of Honours. The Club is the first point of call for service personnel passing through on assignment, and those called upon to serve in London such as in the recent Covid crisis. In planning terms, the Club is considered a 'Sui Generis' use due to the bespoke nature of the facility, which includes remedial and therapeutic services to members suffering from PTSD.</p> <p>Description of Proposed Site Allocation Area</p> <p>The Waterloo Triangle site referred to in the introduction of this letter comprises of three</p>	

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>separate freehold components as shown in Figure 3 below.</p> <p>The largest component (shown in pink and blue) is owned by our client and comprises three towers built atop a low-rise base in 1975. The first of these buildings is the Capital Tower on the corner of Sandell Street and Waterloo Road, which is leased to Bourne Capital and includes 70,000 sq. ft of private rented office accommodation over 16 levels. The two remaining 10 and 25 storey towers (up to 79 metres) are occupied by the Union Jack Club (UJC), which provides accommodation and recreational facilities for serving and former members of the Armed Forces and their families.</p> <p>[Diagram of site]</p> <p>The portion of the Triangle site to the south of the UJC landholding (shown in purple in Figure 3) is owned by Bourne Capital and consists of low-rise 2-3 storey retail/commercial buildings (nos. 99-101, 103-107 and 109-119 Waterloo Road and 124-126 Cornwall Road) and the 4 storey commercial building at Mercury House (117 Waterloo Road). These buildings are in generally good condition but because of their small size do not capitalise on the high level of accessibility provided by Waterloo Station and contribute poorly to the surrounding public realm.</p> <p>Finally, the public open space of Emma Cons Gardens (shown in yellow in Figure 3) is located to the south of Mercury House and is owned by the Council. It is understood that designs are currently being progressed for the upgrade of this open space.</p> <p>As shown in Figures 4-6 below, the podium and buildings on the Waterloo Triangle site relate poorly with the surrounding context and present a largely inactive street frontage along an important pedestrian route.</p> <p>[photos of site]</p> <p>The entirety of the Triangle site has a PTAL of 6b, which is the highest level of accessibility. Waterloo Road is a very busy thoroughfare, accommodating large numbers of buses and pedestrians accessing Waterloo and Waterloo East stations.</p> <p>Surrounding Context</p> <p>The transport hub of Waterloo Station is located to the west of the site with the entrance to Waterloo East train station and other four storey commercial buildings on Sandell Street, including the Wellington Public House, concealing the elevated railway viaduct behind.</p> <p>To the east of the Triangle site is the OCCC Estate which comprises four 1940s residential blocks of flats, laid out in an 'E' shape. There is an extant planning permission from 2019 (16/06172/FUL) on this site for a phased development comprising demolition of existing buildings and construction of a predominantly 7 to 12 storey mixed use scheme with 215 dwellings, theatre rehearsal space (sui generis) and offices/cafe. To the south of the OCCC Estate is the Bus Garage. The retail areas of The Cut and Lower Marsh lie to the west of the site.</p>	

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			<p>There are a number of conservation areas locally as shown in Figure 7 below. There are also a number of heritage structures including the Grade II* Old Vic and National Theatre buildings to the south and the Grade II listed Fire Station to the south west. [Plan showing heritage assets]</p> <p>Current Planning Policy Context The site falls within the London Plan designations of the Waterloo Central Activities Zone (CAZ) Retail Cluster and the Waterloo Opportunity Area Planning Framework. The latter is indicated in the London Plan 2021 as having the capacity for 1,500 new homes and 6,000 new jobs by 2041 to be achieved through an intensification of commercial, residential and cultural facilities associated with a major transport hub, a major office location and a Strategic Cultural Area.</p> <p>As shown in Figure 8 below, the Lambeth Local Plan designates the Triangle site as an appropriate location for tall buildings within Waterloo, with a suggestion that building height should be in the region of 70m AOD, stepping down to the south. The Triangle site also falls within the Lower Marsh/The Cut/Leake Street Special Policy Area, which seeks to protect the longstanding and unique cluster of smaller, independent retailers in the area, whilst Waterloo Road itself is allocated as a Healthy Route and part of the Waterloo City Hub. [Plan showing tall building locations]</p> <p>The site is subject to Policy PN1 (Waterloo and South Bank) of the Lambeth Local Plan. Key aspects of the vision for the area include:</p> <ul style="list-style-type: none"> • supporting development that contributes to long term place-shaping objectives • optimising the area's potential for town centre activities, including a requirement for at least 50 per cent of ground floor units in the Lower Marsh/ The Cut/Leake Street Special Policy Area to be in retail use; • promoting the growth of the area's role as a business district by supporting office development and affordable workspace; • promoting and supporting development of an appropriate height, scale and form to reinforce Waterloo and South Bank's distinct identity, respecting strategic and local views and local contextual considerations, and preserving the setting of heritage assets and the Outstanding Universal Value of Westminster World Heritage Site; and • promoting development and uses that actively contribute to the enhancement of the collective public realm and increase the amount of green infrastructure in the area. <p>Policy PN1 currently only includes three Site Allocations in the form of Elizabeth House, the Shell Centre and the ITV Studios site.</p> <p>Further to the above, the South Bank & Waterloo Neighbourhood Plan 2017 – 2032 includes a key objective to improve upon open space provision within the area. The Plan notes that ongoing development continues both to reduce this and put pressure on existing spaces. It</p>	

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>identifies that many streets are polluted, noisy and unpleasant to navigate on foot, and back streets have been designed in ways that favour cyclists over pedestrians.</p> <p>Historic Designation as Major Development Opportunity (MDO) The 'Waterloo Triangle site' has historically been identified as a Major Development Opportunity (MDO) in the list of Local Plan Sites under Policy MDO 107 of the Unitary Development Plan, originally adopted in August 2007. Within this document the site was described as follows: MDO 107 - Waterloo Triangle (3Is/Mercury House/Union Jack Club), Waterloo Road – Area: 0.6 Ha Potential for comprehensive redevelopment of sites. Building heights should step down towards the Old Vic. Potential to set back buildings further away from the viaduct to minimise visual impact on Roupell Street/Whittesley Street and potentially open up a blocked view of St Paul's from Lambeth Bridge/Millbank. Development needs to facilitate public transport improvements on Waterloo Road. Should provide active frontage uses to Waterloo Road and Emma Cons Gardens and have better links to Waterloo station, in particular improvements to Waterloo East Station. Should facilitate relocation of Cornwall Road Bus Garage. Improvements to Emma Cons Gardens as part of development. The 'Waterloo Triangle (3Is/Mercury House/Union Jack Club) MDO Site Allocation was saved and remained active as part of the Lambeth Core Strategy January 2011. In 2013, the Council included the Triangle site within the Waterloo Area Supplementary Planning Document (SPD) with an increased aspiration to create 15,000 new jobs and 1,900 new homes. It specifically identified the Union Jack Club as a potential opportunity site and outlined the following development principles to be considered as part of any future redevelopment: [Extract from Waterloo Area SPD] Despite the clear recognition by the Council of the development potential of the Triangle site, it was not carried forward into the Lambeth Local Plan 2015 or the most recently adopted Lambeth Local Plan 2021. No rationale has been provided in the evidence base to explain the omission of the site from these later Local Plans.</p> <p>Recent developer interest in the 'Waterloo Triangle' Site Since 2019, Bourne Capital (BC) have sought to engage in pre-application discussions with LB Lambeth on a redevelopment scheme for their landholding in the central part of the Triangle site, comprising 99-101, 103-107, 117 (Mercury House) and 109-119 Waterloo Road and 124-126 Cornwall Road. The redevelopment scheme is understood to comprise the following: • Demolition of existing buildings, with the exception of Mercury House, and the construction of an 18 storey office tower with single storey basement towards the northern part of the site;</p>	

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			<ul style="list-style-type: none"> • Retention and refurbishment of Mercury House, to include an additional floor at roof level, to accommodate c. 3,200 sq. m of mixed retail/commercial floorspace, including A3/A3 (restaurant/café/public house) uses and a potential live music venue; • A total of c. 25,000 sq. m of office and ancillary floorspace (B1a Use Class) <p>The UJC are clearly supportive of the principle of redevelopment on the Triangle site, given their own ambitions for their landholding, and welcome the opportunity to work with parties such as Bourne Capital as part of a design-led approach to site optimisation, as required by Policy PN1 of the Local Plan.</p> <p>However, the UJC have fundamental concerns about the scale, massing and design of the above proposals from Bourne Capital. It is felt strongly that the proposals will have a clear impact on the existing UJC facility, the future development potential of the UJC landholding and the surrounding context, including designated heritage assets. It portrays all of the characteristics of unsympathetic piecemeal development and will deliver few (if any) planning benefits, reducing rather than enhancing public realm and street activation, two key objectives for the Waterloo area.</p> <p>Despite the UJC raising these concerns with Council planning officers and Bourne Capital directly, the pre-application scheme has continued to develop in a similar form and was presented to Lambeth's Planning Applications Committee in June 2021. Lambeth officers have since expressed a strong desire that the Bourne Capital proposals respond more appropriately to their context and adequately respect neighbours such as the Union Jack Club and the consented Grainger scheme to the east.</p> <p>To this end, officers have asked Bourne Capital to engage with the UJC to develop a more co-ordinated and considered masterplan approach across the entire Waterloo Triangle site that can better achieve the objectives of Policy PN1 of the Local Plan. As a stepping-stone in this process, the UJC will shortly be entering into formal pre-application discussions with the Council to outline their aspirations for the commercial redevelopment of their site and how this could integrate into a successful high quality masterplan approach for the wider island plot. It is within this context that we would contend that the perfect opportunity exists through the emerging Site Allocations DPD to guide the development of a comprehensive masterplan for this prominent island site.</p> <p>New 'Waterloo Triangle' Site Allocation within the Draft SADPD</p> <p>At present the Site has not been allocated for future redevelopment within the recently adopted Local Plan or the draft SADPD, which we consider to be a key omission to the detriment of good placemaking within Waterloo.</p> <p>The draft SADPD proposes the inclusion of four additional sites in the Waterloo and South Bank area (in addition to the three already contained in the Local Plan). The draft document details that the rationale for the inclusion of these sites within the document includes the</p>	

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>following benefits:</p> <ul style="list-style-type: none"> • setting clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver; • addressing site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies; • articulating the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships; and • encouraging landowners to consider the potential for optimising the development capacity of their land and help deliver key placemaking objectives. <p>As identified within this representation, the above rationale is equally, if not more, applicable to the Waterloo Triangle site than the four sites that have been identified in the draft document. The site directly adjoins one of the largest transport hubs in London and is one of eight locations identified as being appropriate for tall buildings within the Waterloo area. This represents a major and rare redevelopment opportunity within such an established urban location. The site had been allocated as recently as 2015 as a 'Major Development Opportunity'. Despite the unexplained removal of the site allocation, this opportunity has only grown rather than reduced in recent years as evidenced by recent developer interest. There is a real danger that this strategically important development site could come forward for development in a piecemeal fashion due to site specific circumstances and different land ownerships. To counteract this, there is an obvious need for emerging development on this site to be guided by site-specific parameters that optimise the development capacity of the land while delivering key placemaking objectives and public benefits.</p> <p>The inclusion of the 'Waterloo Triangle' site would ensure a consistent and coherent design-led approach to development, providing a vital opportunity to install clear, site-specific parameters for the type and scale of development that would encourage the delivery of the following key Local Plan placemaking objectives and public benefits for the area:</p> <ul style="list-style-type: none"> • Design-led optimisation of development potential having regard to site-specific planning constraints including impacts on neighbouring uses, views, townscape and heritage assets; • Creation of major office and commercial floorspace to contribute to the objective for Waterloo to become a major business district at one of London's largest transport hubs; • Delivery of high-quality public realm enhancement, much needed open space and permeability, particularly along Waterloo Road, in line with the objectives of Policies PN1 and Q26 of the Local Plan; • Protection and enhancement of the area's identity as a centre for local needs and specialist independent retailing in line with the Lower Marsh/The Cut/Leake Street Special Policy Area; • Enhanced ground floor activation along the primary frontage of Waterloo Road and the secondary frontage of Cornwall Road and better integration with the entrance to Waterloo 	

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>East station at Sandell Street;</p> <ul style="list-style-type: none"> • Activation and upgrade to Emma Cons Gardens to enhance the green infrastructure and increase usability; and • Exemplary approaches to sustainability including design and construction, urban greening, zero carbon, climate change adaptation etc. <p>Whilst the draft SADPD does acknowledge that it is not necessary to have a site-specific allocation for every potential development site in Lambeth, we consider that the Waterloo Triangle site is of sufficient strategic importance, is available for development in the short to medium term and offers a unique opportunity for regeneration within Waterloo with a clear means to achieve key objectives of Policy PN1 of the Lambeth Local Plan 2021.</p> <p>We trust the above response is of assistance and we look forward to reviewing the outcome of the round of consultation and making further comments on any future change to the Site Allocations DPD. Should you have any questions or wish to discuss, please do not hesitate to contact the undersigned.</p>	
BNPP on behalf of Marlin Apartments	R0557	89-95 Westminster Bridge Road, Waterloo	<p>BNP Paribas Real Estate ("BNP PRE") is instructed by Marlin Apartments Ltd (hereafter referred to as "Marlin") to respond to the Regulation 18 consultation on the Site Allocations Development Plan Document published by the London Borough of Lambeth in January 2022.</p> <p>1. Background</p> <p>Land Ownership</p> <p>Marlin owns a site within the Waterloo area that is currently vacant. It is promoting the site for a mixed-use development comprising residential and hotel uses with Class E uses at the lower levels. Development Management Officers are aware of the proposals.</p> <p>The site also contains a Locally Listed Building with its façade fronting Westminster Bridge Road and directly adjacent to the south is a long-term vacant site known as the 'corner site' at 79-87 Westminster Bridge Road.</p> <p>Marlin seeks to provide accommodation suited for both business and leisure travellers, targeting locations within a 5-minute walk of a London underground station. It is a well-established operator of serviced apartments in London. Marlin. We represented Marlin at the Lambeth Local Plan Examination where we successfully argued that there should not be an embargo on new hotel floorspace within the Waterloo area.</p> <p>89-95 Westminster Bridge Road ("The Site") is identified edge red on the plan at Appendix 1. We consider that it a key site together with the corner site in bringing forward a significant regeneration opportunity within the Lower Marsh Conservation Area and within close proximity to the Lincoln Tower.</p> <p>Site Characteristics</p> <p>The site is within the Central Activities Zone (CAZ), which is a priority for development where</p>	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. The Draft SADPD aims to accelerate housing delivery on the borough's most complex sites, not to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.</p>

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>there is scope for increased capacity.</p> <p>The Council will be aware of the site characteristics, constraints and opportunities, however, a summary is also provided here for reference.</p> <p>The land owned by Marlin as shown at Appendix 1 is around 0.06 hectares and currently comprises Class E authorised uses at ground, basement and mezzanine level. There are six residential units at upper levels directly accessed from the street.</p> <p>The Site has frontages to Newnham Terrace and Westminster Bridge Road and is located in close proximity to Lambeth North tube station.</p> <p>The Site is located in an urban environment where buildings vary in scale, style and usage. This variance in typology is consistent with the Site's position within the Lower Marsh Centre and The Lower Marsh/The Cut/Leake Street Arches Special Policy Area. The Site lies at the southern edge of the Lower Marsh Conservation Area and 89-95 Westminster Bridge Road is locally listed for its architecture and townscape.</p> <p>Planning History</p> <p>Two planning applications for a hotel use have been submitted and subsequently refused on the Site. These are set out below:</p> <ul style="list-style-type: none"> · 20/01444/FUL – Redevelopment to provide a mixed-use scheme comprising 6 residential units, 20 hotel beds (Use Class C1) and restaurant (Use Class A3) together with ancillary uses at basement and ground floor level. · 21/03334/FUL – Redevelopment of the site to provide a new 11 storey building plus ground and basement at Newnham Terrace with rooftop terrace to provide 74 bedroom hotel and changes at ground floor and basement levels of 89-95 Westminster Bridge Road to provide restaurant (Class E) and community uses (Class F2), and hotel facilities and entrance (Class C1). <p>Directly south of the Site is a vacant plot at 79-87 Westminster Bridge Road, a planning application for a hotel has been submitted and is currently pending determination (Application Reference: 20/03539/FUL).</p> <p>2. Proposed Site Allocations</p> <p>The proposed Site Allocations Development Plan Document includes site-specific policies for fourteen sites distributed across Lambeth.</p> <p>Whilst there are four sites allocated within Waterloo and South Bank, 89-95 Westminster Bridge Road is not currently allocated within the draft document published for consultation. It is considered that the Borough has many more development opportunities and should take of these by widening its Site Allocations List.</p> <p>3. Planning Policy Context</p>	

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			<p>The Council will be aware of the national and regional planning policy context. However, it is salient to highlight specific elements.</p> <p>It is clear that National, London-wide and Local policy support the efficient use of previously developed land in sustainable locations such as Westminster Bridge Road.</p> <p>National Planning Policy Framework ("NPPF") (2021) Sustainable Development and Plan-making The purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7), which has three overarching objectives, which are economic, social and environmental (Paragraph 8). Paragraph 11 sets out that for plan making, the application of the presumption in favour of sustainable development means that:</p> <p>a) Plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including making effective use of land in urban areas) and adapt to its effects;</p> <p>b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring area...'</p> <p>The NPPF sets out the tests against which Local Plans should be prepared and assessed. Local Plan policies should follow the approach of the presumption in favour of sustainable development.</p> <p>The principal test guiding policy adoption is that of 'soundness', namely that the plan should be (Paragraph 35):</p> <ul style="list-style-type: none"> · 'Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; · Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; · Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and · Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.' <p>Efficient Use of Land Paragraph 119 sets out the requirement for planning policies to promote an effective use of land in meeting for the need for homes and other uses. Paragraph 120 goes on to state that planning policies should (inter alia) encourage multiple benefits from both urban and rural land, including through mixed use schemes...; give substantial weight to the value of using</p>	

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			<p>brownfield land within settlements...; and support the development of under-utilised land and buildings.</p> <p>Building a Strong, Competitive Economy Paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt... The approach taken should allow each area to build on its strength, counter any weaknesses and address the challenges of the future.</p> <p>The London Plan (2021) London Plan Policy SD4 Section E states that tourism functions should be promoted and enhanced within the Central Activities Zone ("CAZ"). London Plan Policy E10 Visitor Accommodation provides strategic support for the provision of new hotel facilities within London and supports hotel accommodation within the CAZ. The objective of the policy is to improve the quality, variety and distribution of visitor accommodation and facilities. Paragraph 6.10.2 reinforces the importance of tourism to London's economy. It emphasises that London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the capital.</p> <p>Lambeth Local Plan (2021) Lambeth's recently adopted Policy ED14 sets out additional visitor accommodation will be permitted in Waterloo within the boundary of the CAZ where it does not cause unacceptable harm to local amenity or the balance and mix of local land uses.</p> <p>Conclusion To conclude, it is clear that national, regional and local planning policies strongly encourage the efficient re-use of sites such as 89-95 Westminster Bridge Road for mixed use and intensification.</p> <p>4. Proposed Alterations – The Case for Redevelopment Hotel Need There is a need for additional hotel bed spaces in London and at Waterloo in order to meet demand. Waterloo is a high demand market where demand often surpasses supply. The Lambeth and Waterloo hotel market is a strong and dynamic market benefitting from excellent transport links, proximity to the Southbank office market as well as close proximity to a range of leisure attractions. The provision of an additional hotel would be a positive addition to this market catchment, attracting more people into the area creating added footfall and local</p>	

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			<p>spend.</p> <p>Lambeth has recorded robust growth in hotel demand in recent years, with its occupancy rate lying significantly above the London average. The Marlin Apart Hotel Waterloo located at 111 Westminster Bridge Road achieved an average occupancy in 2019 of 86.9%, higher than the London average of 83.5%. This is exceptionally strong and suggests significant demand locally.</p> <p>The existing concentration and pipeline of visitor accommodation is set out in Lambeth's Update to Topic Paper 5 (2020). It notes that as of November 2020, 43% of the GLA's projected net additions of supply up to 2041 have been completed in Lambeth. This will increase to 49% once all rooms under construction are completed. In our view, the GLA's apportionment for each Borough was undertaken at a snapshot in time and does not reflect individual market dynamics. It should also be noted that it is very unlikely that all of the schemes in the planning pipeline will be built out.</p> <p>Site Suitability</p> <p>Lambeth has seen significant regeneration throughout the borough in the last 10 to 15 years. In particular, the South Bank area between Waterloo and Lambeth North has seen significant change with hotel and office development forming a significant part of this transformation and job creation.</p> <p>The Site is located within the CAZ, London's vibrant centre. In terms of land use, it is clear that the site is positioned within an area that is characterised by mixed-use high-density development.</p> <p>The Site provides a significant opportunity for redevelopment; it sits within one of London's prime tourist locations. It is located in a highly sustainable location with a PTAL of 6b, it includes an area of under developed land to the rear of the locally listed that could be developed to achieve an efficient use of land, contribute to land use needs, and enhance the local built environment. Along with the vacant site located at 79 Westminster Bridge Road, there is an opportunity to optimise site capacity, provide a landmark building and help deliver key place-making objectives.</p> <p>The objective is to undertake a high quality development on the Site that responds to local characteristics and contributes to a changing landscape. A mixed-use scheme would enrich the character of the area and improve the Site's relationship with the wider CAZ locality.</p> <p>Planning Policy</p> <p>As set out in Section 3, neither the London Plan nor Lambeth Local Plan prevents a hotel use coming forward in this location.</p> <p>Topic Paper 5 – Visitor Accommodation, submitted by Lambeth for the Local Plan Examination was concerned with the concentration of new hotels and served rooms in some</p>	

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			<p>parts of the borough, particularly in Waterloo and Vauxhall. Draft Local Plan Policy ED14 sought to restrict further hotel development in Waterloo and to promote new visitor accommodation in other town centres in the centre and south of the borough to spread the benefits of the visitor economy, whilst managing existing concentrations of visitor accommodation and ensuring other land uses can be delivered.</p> <p>However, the Inspector was not persuaded that there was sufficient evidence to demonstrate a harmful concentration of hotels in the Waterloo Area. As such proposed policy ED14 was amended to be supportive of hotel and visitor accommodation within the Waterloo and Vauxhall areas, subject to proposals not causing unacceptable harm to local amenity and the balance and mix of local land uses.</p> <p>Proposed Allocation The suggested allocation for the Site should read as follows: The site has potential to deliver a mix of uses including residential, hotel bed spaces, commercial and community uses. Incorporating ground floor active frontages accessible to the public will contribute positively to the area. The Site should provide a high-quality development in this prominent location. Any redevelopment should retain the frontage of the Locally Listed Building but there is an opportunity for remodelling at the rear with a taller new building. Design optimisation should take account of proposals for the corner site at 79-87 Westminster Bridge Road. Redevelopment should be informed by a detailed understanding of local heritage assets and sensitively designed to respect the locally listed building. Such a scheme should enhance the character and appearance of the Lower Marsh Conservation Area and contribute to the townscape along Westminster Bridge Road. The design should enhance the local character and heritage through appropriate materials and building form.</p> <p>Conclusion In our view, the Site provides a significant opportunity to contribute to the growth of Waterloo. The Council are missing an opportunity and failing to make effective use of urban land. Marlin has monitored the preparation, examination and adoption of the Lambeth Local Plan and hence are now pushing for the Site to be allocated within the adopted context.</p> <p>5. Closings We trust that the above provides informative comments to the current consultation. 89-95 Westminster Bridge Road, Waterloo is a well-suited site to provide hotel accommodation. For the reasons set out in this letter, it would be appropriate to allocate the site in order to provide comfort to our Client that a planning application could come forward. We would be grateful if you could please confirm safe receipt of these representations and for</p>	

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			<p>the above comments to be considered.</p> <p>Please do not hesitate to contact us should you wish to discuss any of the above further.</p> <p>[Appendix 1 – Site Location Plan]</p>	
Metropolitan Thames Valley	R0605	Land on the corner of Avenue Park Road, Tulse Hill	<p>I write on behalf of Metropolitan Thames Valley Housing, the largest registered housing provider in the Borough of Lambeth. Metropolitan Thames Valley Housing have a well-established and long running partnership with Lambeth Council with a commitment to provide good quality, affordable housing to residents of Lambeth.</p> <p>In 2020/21, Metropolitan Thames Valley Housing will have commenced over 550 new homes in the Borough of Lambeth of which over 70% will of an affordable tenure.</p> <p>I write in respect of the current public consultation being undertaken by Lambeth Council on their proposed Draft Site Allocations Development Plan Document (SADPD) and with specific regard 1 (one) site in the freehold ownership of Metropolitan Thames Valley Housing Association at;</p> <p>- Land on the corner of Avenue Park Road, Tulse Hill</p> <p>Land on the corner of Avenue Park Road, Tulse Hill</p> <p>Site Location</p> <p>[Site plan]</p> <p>Site and Surroundings</p> <p>The Avenue Park Road site is located wholly within the Thurlow Park ward of the London Borough of Lambeth and covers an area of 0.23 hectares and is bounded by Thurlow Park Road to the north east, Avenue Park Road to the south east and Tulse Hill Station and railway line to the south west.</p> <p>The site comprises of former rail sidings and has a long established industrial character. At present the site is vacant and cleared of all buildings. The site is securely hoarded with access taken from Avenue Park Road.</p> <p>There are a number of existing shrubs and trees, many of which are self-seeded along the site boundaries that have become overgrown. Within the site, vegetation is limited with minimal ecological benefit.</p> <p>The site rises by c.3m from north to south, it falls outside of the flood plain and there are no environmental designations preventing or compromising the sites development. Furthermore, the site is not located within the setting of and Listed Buildings or in a Conservation Area.</p> <p>The surrounding area is varied in use and character. The site fronts onto Thurlow Park Road, which consists of a range of residential and limited commercial uses. Avenue Park Road forms the eastern boundary of the site which links Thurlow Park Road to Norwood Road.</p> <p>There are residential properties to the east of the street that vary in size, style and character. Maley Avenue runs perpendicular to the site and accommodates a mix of large three to four storey Victorian semi – detached town houses.</p>	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.</p> <p>However, the site is located in a SINC. As Lambeth has an up to date 5-year housing land supply, housing need can be met using a brownfield first approach. This means that development on areas of open space is not required to meet the council's housing need. As such, development on open space and SINC's is not supported and the principle of residential development at this site is considered contrary to London Plan Policy G6 and Lambeth Local Policy EN1.</p>

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			<p>The site is located to the immediate east of Tulse Hill Railway Station. The site benefits from a high public transport accessibility level (PTAL) of 6A. Train services to and from Tulse Hill call at major interchange destinations including St Pancras, Farringdon, London Victoria and London Bridge. They also call at local destinations such as Streatham, Peckham Rye, Crystal Palace and East Croydon. These services run at regular intervals with c.10 services per hour in each direction during peak periods.</p> <p>Relevant Site Planning History Application Reference 13/02310/FUL Mayfair 500 (Tulse Hill) Ltd submitted a planning application to Lambeth Council on 29 May 2013 on the site for; Demolition of all existing structures on site and the erection of a part three, part four, part five / six storey building comprising 47 no. market and affordable residential units and 203 sqm of commercial (A1,A2,B1) uses The application was subsequently withdrawn on 29 August 2013 following concerns raised by the Council in relation to the proposed design, layout, urban grain of the scheme, architectural quality, landscaping and highways and transport. Application Reference 14/00129/FUL Mayfair 500 (Tulse Hill) Ltd submitted a planning application to Lambeth Council on 09 January 2014 on the site for; Demolition of all existing structures on site and the erection of a part three, part four, part five storey development comprising 42 no. market and affordable residential units and 175 sqm of B1 floorspace with associated refuse and cycle storage and landscaping Full planning permission (including S106 Agreement) was granted on 08 May 2014. Metropolitan Housing Trust purchased the site from Mayfair 500 (Tulse Hill) Ltd following grant of planning permission. Planning application reference 14/00129/FUL was implemented following the discharge of pre commencement planning conditions in March 2017. Application Reference 14/06834/VOC Metropolitan Housing Trust submitted a variation to planning reference 14/00129/FUL to; Vary condition 2 to A) increase the level of affordable housing from 17 units to 24 units, B) changes to dwelling mix in terms of bedroom numbers and per capacity and C) changes to mix of affordable rent and shared ownership within the affordable housing offer This variation was received on 24 November 2014 and granted permission on 03 September 2015. Application Reference 16/07066/VOC Metropolitan Housing Trust submitted a variation to planning permission 14/06834/VOC of planning reference 14/00129/FUL to;</p>	

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			<p>Vary condition 2 to A) increase level of affordable housing from 24 units to 42 units, B) changes to the mix / split of affordable rent and shared ownership within the affordable offer</p> <p>The variation was received on 20 December 2016 and granted permission on 27 September 2018.</p> <p>Since acquisition of the site and implementation of the planning permission, Metropolitan Housing Trust identified a high voltage oil filed cable to the south western boundary running adjacent to the Tulse Hill Railway Station platforms. In conjunction with Network Rail, this high voltage cable has been temporarily relocated to enable development of the site. The permanent location of the high voltage cable will be integrated within the developed site.</p> <p>Pre Application Discussions and Emerging Planning Application</p> <p>Metropolitan Thames Valley Housing and Development Partner have held pre application discussions with Officers to discuss the redevelopment of the site via a new full planning application.</p> <p>An initial meeting was held in March 2021 with a detailed pre application response provided. Since this time a Planning Performance Agreement has been entered into between Metropolitan Thames Valley Housing, Development Partner and Lambeth Council; the proposals have been further developed through PPA meetings in respect of density, capacity, height, massing, architectural detail and land use.</p> <p>In addition a presentation to Lambeth Council Design Review Panel took place in July 2021.</p> <p>Draft Site Allocation Development Plan Document</p> <p>The site is not currently identified within the draft SADPD, it is however an established site that has relevant planning history that supports development.</p> <p>Metropolitan Thames Valley Housing wish to promote the site as part of the emerging Draft SADPD consultation for a residential led, mixed use redevelopment to deliver up to 100 new homes and commercial / affordable workspace floorspace with the aspiration to deliver the new homes and commercial / affordable workspace within the next 3 years.</p> <p>Through Planning Performance Agreement meetings, extensive reviews and refinement of site design, density and capacity have taken place. It is of the view of Metropolitan Thames Valley, Development Partner and design team that the site offers the opportunity to deliver a development of up to 10 storeys which focuses on achieving a scheme of high architectural, landscape and public realm quality in a sustainable location; a principal supported and endorsed through the London Plan 2021.</p> <p>Site of Importance for Nature Conservation</p> <p>The site has been partially identified as a Site of Importance for Nature Conservaiton (SINC) following the adoption of the Lambeth Local Plan in September 2021. The designated area</p>	

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			<p>within SINC 16: Railway Lineside – West Norwood train station sits on the outer edge of the site and does not cover the whole site.</p> <p>The retention of the habitat falling within the extended SINC designation is not considered to be congruent with development of the site and the Local Plan ambition for housing delivery in Tulse Hill. This is echoed by the fact no consultation with Network Rail or Metropolitan Thames Valley Housing took place in the designation of the SINC and that the site used to have a site allocation before the extant consent.</p> <p>The existing site levels are built up using compacted rubble to create the existing compound area, however redevelopment of the site will require the removal of this to get back to ground level. As the habitat forming part of the extended SINC designation is established amongst the rubble slopes on the northern and eastern sides of the site clearance of this habitat is unavoidable irrespective of the development footprint. Therefore, retention of the SINC habitat on site is not feasible with the redevelopment of the site.</p> <p>We have prepared a note outlining our intended strategy towards the SINC designation and await comment. It is our intention to ensure the proposed development of the site will contribute to the biodiversity of the area and we believe the inclusion of the site in the draft SADPD will present an opportunity to enhance the ecological value of the area through an agreed site specific strategy and the establishment of a unique management plan or set of measures to help achieve the policy aims in relation to biodiversity whilst delivering additional affordable homes.</p> <p>Conclusions</p> <p>In light of the foregoing, Metropolitan Thames Valley Housing feel this site should be included within the draft SADPD for a residential led, mixed use redevelopment to deliver up to 100 new homes and commercial / affordable workspace floorspace in line with our formal recommendations outlined above.</p>	
DP9 on behalf of MEC London Property 3 Ltd	R0782	60-72 Upper Ground, London, SE1 9LT	<p>Thank you for providing us with the opportunity to comment on the London Borough of Lambeth's (LBL) Draft Site Allocations Local Plan (LDSAD) document as part of the Regulation 18 consultation ending on 22 February 2022. These representations are submitted on behalf of our client, MEC London Property 3 Limited who are the applicants behind a live planning application for a major mixed-use development at 60-72 Upper Ground, SE1 9LT (21/02668/EIAFUL), which seeks permission for the following development:</p> <p>'Demolition of all existing buildings and structures for a mixed-use redevelopment comprising offices, cultural spaces and retail uses with associated public realm and landscaping, servicing areas, parking and mechanical plant'.</p> <p>The Proposed Development at 60-72 Upper Ground is of significant strategic importance and will promote significant economic growth for the South Bank and CAZ by providing a new office, affordable workspace and culture ecosystem. Through the Proposed Development, the</p>	The adjacent site at 60-72 Upper Ground has been the subject of a recent planning application for major mixed-use redevelopment. Through this application and a subsequent call-in inquiry there were extensive discussions around land use principles which might otherwise have formed the basis for a site allocation policy. The decision from the inquiry, which was published on 6 February 2024, provides a context to determine what is and is not acceptable in terms of parameters for the development of the site. While a site allocation policy would by its nature be somewhat non-

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			<p>Site will provide a substantial uplift of economic activity via the provision of over 4,000 operational jobs 1,700 temporary construction jobs per year, and numerous apprenticeship placements. The delivery of the London Studios on the Site will provide much needed cultural production space for Lambeth-based organisations, whilst the cultural consumption and activation of public space around the Site will introduce a new arts, cultural and digital tech destination on the South Bank, contributing to its vibrancy and character.</p> <p>As such, having reviewed the LDSAD, we query why the site at 60-72 Upper Ground site has been excluded from the Site Allocation, given its strategic importance and potential. For context, it is important to note that the 60-72 Upper Ground site is included within Site Allocation 9 (ITV Centre and Gabriel's Wharf), within the Lambeth Local Plan 2020-2035, which was adopted in September 2021. Within the allocation, the preferred use of the site is stated as mixed-use including offices, residential and active frontage uses at ground-floor level, which supports the current development proposals.</p> <p>In contrast to the Local Plan, within Proposed Site Allocation 9 of the DSADPD, the boundary has been amended so that 60-72 Upper Ground is omitted, and the allocation is exclusively related to Gabriel's Wharf and Princes Wharf. In the relevant planning history, it is noted that 72 Upper Ground, adjacent to the site, is subject to a live planning application, with a decision pending.</p> <p>We have been informed by officers that the reason for the omission of the 60-72 Upper Ground site from the Site Allocation is due to the status of the live application, which is at a late stage of consultation and is due to be determined at planning committee towards the end of March, prior to the adoption of the DSADPD. We understand from our discussions with officers that the imminent determination of the application means that the 60-72 Upper Ground site is no longer felt to necessitate inclusion within the site allocation, as, if granted, the permission could be implemented regardless of the Site Allocation.</p> <p>We disagree with this approach for several reasons:</p> <ol style="list-style-type: none"> 1. because the current planning application has not yet been determined. 2. if permission is granted pursuant to the current application, whilst our client's intention would be to implement any permission as quickly as possible, there can be no guarantee that this will be the case. 3. If the application is refused, subsequent amended applications for the site would need to be made to bring forward its development. <p>As a result, it is important that the site remains within the Site Allocation, so that any future development proposals are subject to the appropriate policy guidance and aspirations for the site.</p> <p>Lastly, it should be noted that the existing permission at the ITV building, on the site itself (17/03986/FUL), for the ' Demolition of existing buildings and the construction of two new buildings (up to 14 storeys and 31 storeys in height with two basement levels) for the provision</p>	<p>specific to allow for different development interpretations within an overall framework, the status of 60-72 Upper Ground is such that the inquiry decision allows more detailed and specific conclusions to be drawn.</p> <p>It is not necessary to have a site-specific allocation for every potential development site. Within this context, it is considered that a site allocation policy for 60-72 Upper Ground is no longer necessary and could potentially cause problems with future development of the site if it included elements that proved not to be consistent with the inquiry decision. Relevant elements of the adopted Site Allocation 9 such as the provision of improved pedestrian links between Upper Ground and Queen's Walk (i.e. in between 60-72 Upper Ground and Princes Wharf) have been incorporated into the proposed site allocation in the SADPD.</p>

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>of circa. 44,434 sq.m of offices (Use Class B1), 3,634 sq.m of television studios (Sui Generis), 216 sq.m of retail (Use Class A1) and 213 residential dwellings (Use Class C3) with associated vehicle and cycle parking, access works, servicing and landscaping., has now lapsed, and is therefore unimplementable. This should be acknowledged within the relevant planning history in the context of the allocation.</p> <p>Summary</p> <p>Given the reasons above, we respectfully request that our representations are considered, and the 60-72 Upper Ground site is reincorporated into the Proposed Site Allocation 9. We would be pleased to discuss the issues raised further with you, and should you require any further information, please contact [redacted].</p>	
Savills on behalf of Harrison Housing	R0836	Tonge House, Royal Circus, West Norwood, SE27 0BL	<p>Savills is instructed by registered housing provider Harrison Housing (HH) in relation to property matters – and our client wishes to respond to your department's Lambeth Site Allocations Development Plan Document (SADPD), which has been published prior to submission for independent examination, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>Whilst the SADPD principally relates to polices for fourteen sites distributed across the Borough, from our recent discussions with Officers, we understand that all comments received in relation to the SPD site allocations document will be evaluated by the Council and taken into account in its future decision making.</p> <p>Our formal Representations set out in this letter seek to promote Harrison Housing's property known as 'Tonge House', located at Royal Circus in West Norwood for inclusion within the SADPD as a future allocated residential development site. The Tonge House site is currently the subject of a pre-application enquiry with Officers of your department ([redacted] ref. 21/03892/PREAPP), in relation to development options for a residential new-build scheme comprising market housing, affordable housing and residential units specifically designed for Harrison Housing tenants in the elderly persons sector.</p> <p>1. Background and Context</p> <p>Our client is a charitable organisation that "aims to provide and maintain high quality housing and support for older people of limited means in London". This includes developing the highest standard accommodation, creating a friendly and supportive environment to enable residents to live independently, developing skills and solutions to tackle problems associated with age, and promoting a greater awareness of the housing needs of older people.</p> <p>HH's first almshouse was acquired in 1869; and now the charity owns and manages 12 almshouses, providing accommodation to 171 residents. The client remains one of the leading providers of such housing in London today, and has houses located to the south, west, east and north of the city.</p> <p>One of these homes is the Portal Home for Ladies (Tonge House), located within the centre of</p>	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.</p> <p>However, the site is located in a SINC. As Lambeth has an up to date 5-year housing land supply, housing need can be met using a brownfield first approach. This means that development on areas of open space is not required to meet the council's housing need. As such, development on open space and SINC's is not supported and the principle of residential development at this site is considered</p>

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			<p>the Royal Circus roundabout, in West Norwood (See Map at Appendix 1). Tonge House was first built in 1936, with a bequest from Miss Bertha Mary Portal, who wished to provide good quality and secure accommodation for single Christian women in the parish. The charity was then managed by local trustees, and following retirement of the live-in caretaker, the client was approached by the trustees and took over in November 2017.</p> <p>Following discussions and acting in close partnership with Harrison Housing (the charity freeholder of the land), it was agreed that the property presents an excellent and compelling opportunity to increase the number of almshouse units within the generous grounds of Tonge House, approaching a century after its original development, consequently increasing the beneficiaries of Miss Bertha Mary Portal's bequest. The charity trustees are of course mindful of the current and growing housing crisis across London, and whilst not minded to overdevelop the West Norwood site, they are actively contemplating options to seek to increase housing units on site in such a way that significant garden and green space areas would be maintained and/or provided through new development, of the highest quality. Indeed, trustees are promoting a redevelopment 'master plan' for the site's future – and a consultancy team has prepared a conceptual vision for the site, in response to the trustees' brief, which is currently at pre-application stage with the Council, as described above. Represented by Savills, Harrison Housing took part in the Regulation 19 consultation and Examination sessions of the Lambeth Local Plan 2021 ('the Local Plan'). In this respect, we requested that the Site of Importance for Nature Conservation (SINC) 'blanket designation' applied to Tonge House be removed (Policy EN1). We also made comments on Policy H8 (Housing to meet specific community needs) and Policy H1 (Maximising Housing Growth) and how the redevelopment of the site would contribute to the Council's older persons and general housing targets.</p> <p>Whilst the SINC allocation was not removed from the Local Plan, our client remains of the opinion that Tonge House has great potential for a redevelopment scheme that can re-provide and increase the quantum of housing for specific community needs, alongside new market housing. HH's conceptual vision for the site's redevelopment would provide circa 50% affordable units/habitable rooms – making a significant contribution to meeting identified housing needs within the Borough.</p> <p>Given the SINC allocation, we must stress the HH's trustees and the appointed consultancy team has a high-quality, landscape-led approach at the heart of the project. Biodiversity of flora and fauna, and protection and management of existing trees and introduction of supplemental planting, as part of a landscape scheme around which the development plans are embedded will be of paramount importance.</p> <p>To ensure that there is a transparent and open dialogue about the site's future, it should be noted that the charity trustees have made existing residents of Tonge House aware of the evolving future plans for the site. In addition, London Communications Agency is assisting HH</p>	contrary to London Plan Policy G6 and Lambeth Local Policy EN1.

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			<p>with community and stakeholder engagement.</p> <p>2. Consultation and Policy Your Council is preparing its SADPD, and the Regulation 18 Consultation Draft version is out for public consultation, to today's date. Our representations do not comment on the various sites identified in the draft SADPD; rather, HH wishes to identify and promote its site at Royal Circus for inclusion in the final SADPD document on the strength of the property's latent potential for accommodating a high-quality new housing scheme as described briefly here (please also refer to the ongoing pre-app enquiry).</p> <p>3. Representations On behalf of our client, we request that Harrison Housing's site be included as an allocation within the SADPD. Given the location of the site within West Norwood, we would suggest the property's inclusion in Section 5 of the SADPD: Proposed West Norwood/Tulse Hill Site Allocations. The age and current condition of Tonge House, and the limited number of homes it provides, located in private grounds of considerable size, means that this brownfield site is significantly underutilised. It is a valued asset and significant existing and future resource for the charity – and represents an important objective for the trustees and HH's management board in helping to deliver future bespoke-designed affordable housing of quality for elderly persons in housing need, in an integrated and design-led new development of which the charity and the Borough can be proud. The prevailing 'blanket' SINC designation across the whole of the site could significantly jeopardise and moreover stymie the property's development potential as described – and to that extent, HH is fully committed to working closely with the Council to bring about positive change and redevelopment at Tonge House in a manner that is supported by all parties. In this respect, any scheme would seek to enhance (provide improved habitats and species) the currently 'closed off' SINC, opening part of it up to the general public as a new pedestrian thoroughfare within a garden setting. It should also be noted that the future development proposal will ensure that the new London Plan SINC mitigation hierarchy (Policy G6) and urban greening (Policy G5) are considered and incorporated respectively. Whilst the plans for the redevelopment of the site are still at the developing stage, a future scheme will also contribute to Lambeth's housing requirement of 13,350 homes (Policy H1), as set by the new London Plan. Furthermore, in respect of the existing land use on site, any new proposal would ensure that any accommodation is compliant with Policy H8 (Housing to meet specific community needs) of the DRLLP and Policy H13 (Specialist older persons housing) of the London Plan.</p>	

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			<p>4. Summary Conclusion</p> <p>Given the subject site's clear potential for redevelopment and the contribution it would make to meeting Lambeth's housing targets and a specific identified housing needs, there is a logic and justification for including Tonge House in the final version SADPD as an allocated future residential development opportunity.</p> <p>Furthermore, the positive benefits that the site could bring about for the local community and West Norwood environs would support clear policy principles that the Borough describes in the adopted Local Plan.</p> <p>If Officers agree that there could be much to be gained from exploring matters further, Harrison Housing would be pleased to discuss matters in more detail.</p> <p>I trust my letter is clear and helpful, and that the Inspector will take full and proper account of our client's request and clear objectives. In the meantime, if the Inspector or Programme Officer have any immediate queries, please contact [redacted].</p> <p>We would appreciate being kept closely informed of the progress of the SADPD. We may wish to supplement and/or clarify these representations in person, or in writing, at a future date, including at any Examination into the plan. We therefore reserve our client's rights in that regard.</p> <p>[Appendix 1 – Aerial View of the Royal Circus Roundabout Site]</p>	
Transport for London Commercial Development	R0848	North Vauxhall	<p>Thank you for providing the opportunity to comment on the Lambeth Draft Site Allocations Development Plan Document (SADPD) Regulation 18 Consultation.</p> <p>The following response represents the views of the Transport for London Commercial Development planning team (TfL CD) in its capacity as a landowner in the borough only and does not form part of the TfL corporate response. Our colleagues in TfL Spatial Planning will provide a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p> <p>TfL CD works to identify development opportunities throughout our landholdings. We work to unlock underutilised land through pursuing innovative solutions to enable development on our sites. We are committed to providing exemplary development that will showcase the Mayors objectives of providing good growth.</p> <p>TfL CD is a significant landholder in the borough. We have identified several sites for residential led and mixed-use development which will make a significant contribution towards meeting borough and TfL housing targets, as well as jobs and improved public transport infrastructure. These sites have been promoted by TfL through representations to the various stages of your Local Plan process since 2017. The sites are listed below (site plans and summaries are included in Appendix 1 (with the exception of Fenwick South, Montford Place and Nine Elms that benefit from planning permission)):</p> <ul style="list-style-type: none"> - Fenwick South - North Vauxhall 	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.</p>

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			<ul style="list-style-type: none"> - Land at Christchurch Road - Brixton Bus Garage (former tram shed) - Stockwell Station - Montford Place - Nine Elms Station OSD <p>Of the above sites, Montford Place and Nine Elms Station OSD have planning consent with Fenwick South being under construction.</p> <p>TfL CD note that none of the above sites are included in the draft SADPD as any of the proposed additional allocations. Both the SADPD and the evidence base are unclear in how the chosen 11 additional sites were chosen over other sites submitted in the call for sites process. TfL CD would welcome any information that would provide clarity regarding the methodology used in the site selection.</p> <p>We agree with SADPD paragraph 1.13 which points out that it is not necessary to have an allocation for every development site in Lambeth (and indeed many large complex sites do come forward for development without allocations). However, we consider that site specific planning policies for our sites should be included in this SADPD. These sites all represent development opportunities that could be delivered within the Local Plan timeframe (2020 – 2035). Site allocations would aid in unlocking these sites which are important to ensure the Mayor can deliver new homes and jobs, along with much needed revenue for TfL.</p> <p>TfL CD welcome further discussion on our sites or matters that are discussed in this letter. We hope that these representations are helpful but if you require any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me.</p> <p>North Vauxhall Proposed uses: Mixed-use development This is a new site which will be unlocked through the Vauxhall Gyratory reconfiguration. It has the potential for significant residential-led mixed-use development which will contribute to the creation of a new Vauxhall town centre.</p>	
Transport for London Commercial Development	R0848	Land at Christchurch Road and Streatham Hill	<p>Land at Christchurch Road and Streatham Hill</p> <p>Proposed uses: Community-led residential development (100% affordable) with publicly accessible open space</p> <p>TfL CD considers that this site should come forward as a wholly affordable housing scheme led by the community, whilst also providing accessible open space to the benefit of residents and the wider local community.</p> <p>The site is adjacent to the eastern side of Streatham Hill Road and the southern side of Christchurch road. The site is currently vacant and has no public access. Previous site uses comprise residential development as a continuation of the housing line along Streatham Hill,</p>	Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination

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			and post-war pre-fabricated residential bungalows The site contains five mature trees which have Tree Preservation Orders.	of the Lambeth Local Plan 2021. Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.
Transport for London Commercial Development	R0848	Brixton Bus Garage, Brixton Hill (former tram shed)	Brixton Bus Garage, Brixton Hill Proposed uses: Residential-led development TfL CD believes that a residential development could be developed on the Brixton Bus Garage site incorporating the existing bus station uses. The site is currently a large bus station with potential for intensification of the station to co-locate it with residential development on the site. The development would be sensitive to the listed buildings and conservation area in close proximity to the site. The site has a PTAL of 6b making suitable for car free development in line with the Intend to publish London plan.	Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021. Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.
Transport for London Commercial Development	R0848	Stockwell Station	Stockwell Station Proposed uses: Residential-led development Stockwell station presents a potential opportunity for redevelopment to provide residential development above the station and on adjoining land. The site has an excellent PTAL rating of 6b and it should be optimised in line with Intend to publish London Plan Policy and the National Planning Policy Framework 2019.	Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.

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				Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.
Iceni on behalf of Telereal Trillium and Arch Company	R0849	Land and retail kiosks adjacent to Streatham Common Station, SW16 5NR	<p>On behalf of our client, the Arch Company (Arch Co) and Telereal Trillium, we hereby provide our comments on the London Borough of Lambeth's Regulation 18 Draft Site Allocations Development Plan Document (DSADPD). In response to the consultation document, this letter of representation provides general commentary on the DSADPD, as well as details of a site at Streatham Common Station which is of interest to Arch Co and which we would like to promote for site allocation in the DSADPD.</p> <p>a. Background – Arch Co. Arch Co acquired Network Rail's former commercial estate business in 2019. It is the landlord for more than 4,000 businesses across England and Wales, making it the UK's largest small business landlord, working with thousands of business owners, from car mechanics to bakeries and restaurants, who make a unique and vital contribution to the UK economy. Telereal Trillium are Arch Co's retained advisors on planning and development matters. Arch Co have had an interest in the Streatham Common site for a number of years and fully believe that it presents a fantastic opportunity for redevelopment, and that a site allocation in Lambeth's Site Allocation document would help to unlock its development potential and assist the borough in meeting its future development needs.</p> <p>b. The Site Site Description The Site comprises the land and retail kiosks adjacent to Streatham Common Station, SW16 5NR. It is located on a prominent corner position between Greyhound Lane and Estreham Road. At around 0.05 hectares in size, the Site comprises four existing commercial units, including three single-storey retail kiosks which total c. 90 sqm and an industrial building of c. 50 sqm with an associated parcel of land used as a timber merchant, including open storage. The south-eastern corner of the Site, where the retail kiosks are located, is within the Streatham Common Local Centre. A number of local amenities are located within the Local Centre along Greyhound Lane, including the Railway Pub; cafes and restaurants; a post office and local independent retailers. Due to the Sites location adjacent to Streatham Common station, it is very well connected by public transport. The station provides regular Southern Rail connections to London Victoria,</p>	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.</p>

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			<p>London Bridge, Sutton, Croydon (and the south coast beyond) and Milton Keynes. There are a number of bus stops along Greyhound Lane, with frequent connections to Brixton and Morden via Bus Routes 60 and 118. The PTAL websites provides information on forecast improvements to public transport and this shows that by 2031, due to capacity improvements on the train services, the PTAL of the Site will have increased from 3 to 4, with locations very nearby the Site having a PTAL of 5. This therefore improves the sustainability of the Site, creating new opportunities for development given the location of the Site near this important local transport hub.</p> <p>Whilst the Site does not contain any Listed Buildings and is not within a Conservation Area, it is directly south of a Locally Listed Building (Streatham Common Railway Station Main Building). A review of the Environment Agency's Flood Risk Map for Planning has found that the Site is located in Flood Zone 1 and as such has a low probability of flooding.</p> <p>Planning Designations The Lambeth Local Plan and Policies Map (2021) identifies the following planning designations relevant to the Site:</p> <ul style="list-style-type: none"> • Locally Listed Streatham Common Station building to the north of the Site. • Streatham Common Local Centre (south-eastern corner and southern edge of the Site). <p>Whilst the Site is not specifically designated as employment land, we are aware that Lambeth Local Plan policies seek to protect the loss of non-designated industrial land. This is one of the most significant policy constraints for the Site, and is one of the reasons we would like to promote the Site for allocation.</p> <p>Planning History On behalf of Telereal Trillium and Arch Co, Icen Projects submitted a pre-application request to the London Borough of Lambeth (LBL) in May 2020 regarding redevelopment options for the Site. A meeting was held with LBL in June 2020 to discuss the proposals, and LBL followed up with feedback in July 2020.</p> <p>The pre-application submission was based on the redevelopment of the Site to provide a building of up to 7-storeys with 25 residential units and c. 200 sqm of flexible commercial floorspace at ground floor level, alongside associated amenity space, access and car parking. LBL Officers concluded that the principle of the redevelopment of the Site for a mixed-use residential development comprising 25 flats and commercial floorspace, in a building of up to 7-storeys, was acceptable in principle – however, this was subject to the re-provision of the existing industrial and retail floorspace.</p> <p>Taking into consideration the industrial unit and yard space, as well as the retail units, the Site currently comprises 83% industrial land and 17% retail units. As such, the policy requirement to re-provide these uses would mean that essentially a whole floor of the development would</p>	

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			<p>have to comprise of these uses. Furthermore, if a loss of industrial floorspace was proposed, this would trigger a requirement for 50% affordable housing. Following the pre-application feedback, the project team explored a number of different options to accommodate these uses, but all options made the proposals undeliverable, due to competing demands on ground floor space, knock on impact on unit numbers, and viability. As such, the client has not taken any further action on these proposals.</p> <p>c. Comments on the DSADPD The consultation on the DSADPD welcomes comments on all aspects of the document, including on site specific allocations. Arch Co have no comments on the specific site allocations which are considered in the draft document, but would like to use this opportunity to promote the Streatham Common Site for a site allocation. The purpose of the DSADPD is to help deliver sustainable growth and investment in Lambeth through the mechanism of site-specific planning policies. The document sets the following reasons for why sites have been allocated in the DSADPD:</p> <ul style="list-style-type: none"> • To set clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver; • To address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies; • To articulate the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships; • To encourage landowners to consider the potential for optimising the development capacity of their land and help deliver key placemaking objectives; • To signal some additional sites as appropriate for tall buildings, outside the locations already identified in the Local Plan; and • To enable key strategic infrastructure to come forward in a timely way. <p>The document acknowledges that it is not necessary to have a site-specific allocation for every potential development site in Lambeth, noting that many larger sites can and do come forward successfully without an allocation. We would agree that a site allocation is not necessary for every site; however, we consider that the Streatham Common Site is one which should be considered for an allocation. Below we take each point in turn to demonstrate why this Site should be considered for an allocation.</p> <p>The Delivery of Small Sites The National Planning Policy Framework (NPPF) (2021) acknowledges the benefits of the delivery of small sites, noting in particular that they can make an important contribution towards the housing requirements of an area, and they are often built-out relatively quickly.</p>	

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			<p>Small sites are often built out more quickly than large sites as they are less likely to have multiple landowners and as it is a smaller area of land to develop, work can be completed faster.</p> <p>Nevertheless, the NPPF also makes clear that in order to promote the development of a good mix of sites and to help bring small sites forward, local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.</p> <p>In the Lambeth Local Plan (2021) the document sets out a housing trajectory in Annex 12. This sets out Lambeth's expected trajectory of housing delivery for the period 2019/20 to 2028/29. For the delivery of small sites, Lambeth have assumed that 400 homes will be delivered per year on small sites. It is understood that this figure has come from Lambeth's review of previous completions in the Borough, which suggested that in the past an average of 400 homes have been delivered on small sites each year. However, there are a finite number of brownfield small sites available for development, so it is unclear if Lambeth can achieve this same delivery rate going forward.</p> <p>The DSADPD identifies a number of small sites (less than one hectare) for allocation; however, based on the number of homes stated in each allocation, these sites would only deliver around 400 homes in total. As far as Lambeth's trajectory is concerned, this would only equate to one-year of small site housing delivery. Furthermore, in order for Lambeth to meet the NPPF requirement for 10% of their housing requirement to be on sites no larger than one hectare, Lambeth would need to identify at least 1,335 homes (10% of Lambeth's housing requirement of 13,350) on small sites.</p> <p>It is therefore considered that Lambeth have fallen short of this requirement and have failed to identify enough sites to meet the NPPFs requirement. As the Streatham Common Site is 0.05 hectares in size, it would be well placed to be considered as a small site to meet the NPPFs requirement and help Lambeth meet their housing trajectory for the delivery of 400 homes on small sites per year.</p> <p>The Site Requires a Tailored Approach</p> <p>Following the pre-application meeting with Lambeth, the project team tested a number of development options, with the intention of meeting the policy requirements. However, it was simply impossible to accommodate the requirements to 1) retain the industrial floorspace (or 65% of the industrial floorspace); 2) retain the small retail floorspace; 3) deliver a scheme of no more than 7-storeys; 4) deliver policy compliant affordable housing; and 5) deliver high-quality residential units.</p> <p>The Arch Co understand the reason policies exist to protect industrial land and have tried to come up with options that make the retention of some industrial floorspace possible on the site. But no matter what options are explored, this will result in the loss of some floorspace.</p>	

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			<p>This therefore triggers the requirement for 50% affordable housing, which makes the redevelopment of the site completely undeliverable.</p> <p>Given the prime location of the site directly adjacent to Streatham Common Station, on the edge of the Local Centre, and within an area which is set to be subject to other development and change (potential redevelopment of the Homebase site), it is considered that the Site should be considered an excellent redevelopment opportunity which can revitalise and bring investment into this part of Streatham.</p> <p>It should be further noted that the “industrial” use of the site equates currently to a business manufacturing and selling sheds, and most of the site is comprised of open-storage. It is contended that this does not represent an efficient use of land in such a sustainable location, and it is unlikely that planning permission would be granted under current or emerging policies for such a use which failed to maximise the potential of the site. As such by insisting on like for like reprovision this is likely to work against the delivery of a much needed high-density mixed-use development of the site.</p> <p>On this basis, the Arch Co consider that a more tailored approach is required, and some site-specific policy is needed to help guide the development options for the site. The Arch Co would be more than happy to work with Lambeth to design a site allocation which considers the overarching policy objectives, but tailors these to make the redevelopment of the site actually possible. Later in this letter we set out some of the key considerations which Arch Co would like taken on board in a future site allocation.</p> <p>Optimisation of Development Capacity</p> <p>At present this site comprises buildings of no more than one-storey and is largely comprised of areas of open storage. It is considered that given the objectives of the NPPF and Lambeth's Local Plan, it is completely inappropriate for a site which is located directly adjacent to a well-connected station and a Local Centre to be this underutilised.</p> <p>A site allocation would allow Arch Co and Lambeth to work together to come up with an optimised development capacity for the site, which is both deliverable, and takes on board the competing policy requirements.</p> <p>Site Allocation for the Streatham Common Site</p> <p>As noted above, we consider that a site allocation would help to provide a more tailored policy approach to its redevelopment, and this would be beneficial as it would allow Lambeth to identify another small site to help meet its small site housing target.</p> <p>In exploring development options for the site, Arch Co have found that there are a wide range of competing policy requirements, which simply make the redevelopment undeliverable. Arch Co are aware that designing the site allocation will require engagement with Lambeth and they would be happy to do this. However, Arch Co have identified a number of specific</p>	

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>requirements which they would like reflected in a site allocation – these are set out below.</p> <ul style="list-style-type: none"> • A residential-led development. With the capacity for at least 25 homes. • A more bespoke approach to the re-provision of the industrial / commercial floorspace which enables residential development to be provided at a sufficient capacity, whilst providing some level of co-location of uses. • Allowance for a viability tested route to the delivery of affordable housing. • Allowance for a variety of different housing types to come forward, including Build-to-Rent or for market sale. • Heights of up to 7-storeys. <p>d. Conclusion</p> <p>In this letter, Icen Projects have provided comments on behalf of Arch Co on the Regulation 18 Draft Site Allocations Development Plan Document. The main purpose of this letter of representation is to promote the Site at Streatham Common Station for Site Allocation. As set out in the latter, we feel a strong case can be made for the Site to be allocated within the Site Allocations Development Plan Document. One of the main reasons for the allocation relates to the existing industrial use and the challenging planning policy position which would need to be followed to unlock the redevelopment of the Site. Whilst we understand the purpose of planning policy to direct the right type of development to the right locations, this policy makes the Site unviable and undeliverable. As such, a pragmatic approach needs to be taken if development is to come forward on this key brownfield site.</p> <p>We consider that redevelopment of this Site would provide significant benefits and improvements to the local area. At this stage, following the planning policy position supported by Officers would prevent this site being pursued any further and it would remain as an underutilised site in an area which is in need of investment and which is undergoing wider changes.</p>	
DP9 on behalf of Bourne Capital	R0872	Waterloo Estate (seeking site not to be allocated)	<p>We write on behalf of our client, Bourne Capital, in response to Lambeth Council's draft Site Allocations Development Plan Document ('SADPD').</p> <p>Bourne Capital is the owner of the Waterloo Estate (the 'Development Site') which comprises various buildings along Waterloo Road and Cornwall Road. Bourne Capital is currently in advanced pre-application discussions with Lambeth Council in regard to a highly sustainable and quality development proposal at the Development Site, which comprises the demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road, and construction of a ground plus 18 storey office building in place of them, together with the refurbishment of 109-119 Waterloo Road (known as 'Mercury House') for primarily office and retail uses.</p> <p>Bourne Capital has been in pre-application discussions with Lambeth Council since 2018 and a planning application submission for the development proposal is imminent, with various core</p>	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific</p>

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
			<p>planning elements of the development proposal already agreed with Lambeth Council. The Development Site is not currently identified as a Site Allocation within the SADPD. Bourne Capital wishes to set out, formally, as part of the SADPD consultation, that, Bourne Capital does not believe a Site Allocation for the Development Site, or wider landholdings bounded by Waterloo Road, Cornwall Road and Sandell Street, is necessary. This is owing to the fact that the landholdings sit within the Waterloo Opportunity Area within the London Plan 2021 and Lambeth Local Plan 2021, which both clearly support growth potential and create a positive policy framework for dense, office-led regeneration at the Development Site, and wider landholdings, as it stands.</p> <p>To the north of the Development Site, bounded by Sandell Street and Cornwall Road, land interests are owned by multiple parties including the Union Jack Club and 91 Waterloo Road ('Capital Tower'), and considering the very different timing, viability constraints and development objectives of those parties, it would not be appropriate to consider the land interests in a single Site Allocation. Therefore, there is an absolute requirement for the redevelopment of Bourne Capital's Development Site to be considered on a standalone basis to the wider land interests including those building owned by the Union Jack Club and Capital Tower, in order to ensure that Bourne Capital's development proposal would not be dependent on a redevelopment of the wider land interests, which may or may not come to fruition in the future.</p> <p>Notwithstanding the above, during the course of Bourne Capital's pre-application process, a thorough analysis of the development potential of its landholding has been carried out, including a review of site opportunities and constraints. In particular, Bourne Capital has drawn up a cumulative development study which illustrates how a notional development could come forward on the Union Jack Club and 91 Waterloo Road neighbouring land interests in the future. The study demonstrates that a major development on the UJC and Capital Tower land can comfortably co-exist with Bourne Capital's development proposal.</p> <p>We trust that the above can be acknowledged and Bourne Capital would be pleased to meet with Lambeth Council on this subject should any further clarification be required.</p>	allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.
SoWN	R1312	Waterloo Estate and Union Jack Club	<p>There has in the past been a site allocation covering this entire city block. The recent pre-app for the Waterloo Estate and presentations by the Union Jack Club have reinforced the need for a whole site approach in this location.</p> <p>Standing directly opposite Waterloo Station, in the very heart of the area, this is an incredibly important site that has the potential to provide many public benefits beyond those that could be provided by piecemeal development.</p>	Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
				Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.
SoWN	R1312	Waterloo Station	We understand that a master-planning exercise is currently being carried out by various parties, but not including the main resident community groups. The station occupies a very large site centrally in the Southbank and Waterloo area, and development of its periphery and undercroft have been discussed over many years. This site has the potential to improve many links across the area, and it will have an influence well outside of its borders.	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.</p>
SoWN	R1312	Johanna School / Baylis Road	The recent Oasis/Lambeth consultation suggesting an over-development of the site with a high-density commercial development was the solution to the funding of a new school on the Johanna site suggests that this site should also be considered within a Site Allocation.	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific</p>

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
				allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.
Waterloo Community Development Group	R1318	Waterloo Station	Waterloo Station is the largest site in Waterloo and dominates all of the land uses, movement and urban forms around. Proposals to redevelop the site in the 2000s were keenly followed and a site specific policy was in place in the UDP, OAPF and SPD. The latter has fallen away, and the policy in the Local Plan has also fallen away after Network Rail formally abandoned their plans in 2010. However, there is a fresh impetus, including a masterplanning exercise for the station undertaken by the landowners. The site has permission for a huge amount of retail and the potential to completely change Waterloo. It is incumbent on the local planning authority to provide a Site Allocation for the Station.	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.</p>
Waterloo Community Development Group	R1318	Waterloo Estate & Union Jack Club	Site specific guidance for this in the previous Local Plan was helpful. Current proposals by one of the landowners may well stymie opportunities to optimize the site. A Site Allocation would encourage both landowners to come together and optimise.	<p>Comment noted. Sites have been included in the Draft SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. It is also set out in the Draft SADPD that there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021.</p> <p>Therefore, it is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites would</p>

Organisation	ID	Site suggested	Reasons for suggestion	Officer response
				be able to come forward successfully in Lambeth without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.

APPENDIX K – OFFICER RESPONSE TO REG 18 REPRESENTATIONS

Officer Response to Reg 18 Representations: Site 1 – Royal Street SE1

Respondent	ID	Draft SADPD Section	Comment	Officer response
Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make.</p>	Noted.
Natural England	R0163	General	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	Noted.
TfL Planning, Transport for London	R0312	Other	<p>The site is bordered by Lambeth Palace Road which forms part of the Transport for London Road Network (TLRN). Any changes to access and proposals for transport interventions on the TLRN including a new pedestrian/cycle crossing on Lambeth Palace Road will need to be assessed by, and subject to, TfL agreement. Street trees will also need to be protected. The site has been subject to recent pre-application discussions and we have requested contributions to buses and the Waterloo Northern line step free access project as part of the transport mitigation package. We would also expect a contribution towards cycle hire capacity and Legible London signage and that the development facilitates the Low Line walking route alongside the railway viaduct. We would expect a substantial reduction in onsite car parking, consistent with the London Plan and NHS/public health targets of increasing the overall health of the public. All these requirements should be summarised in the site allocation to provide clarity and to ensure a consistent approach. The development also provides the opportunity to rationalise servicing off-street. As referenced in the site allocation, the impact of servicing and construction could be minimised through use of shared servicing arrangements and freight consolidation. We welcome</p>	Proposals for pedestrian crossings on Lambeth Palace Road have been revised. The developer contributions sought will depend on the scale and form of development proposed, which is not specified in the policy. As a result the policy wording has been revised to ensure that the relevant policy considerations are highlighted, rather than to include specific mitigation measures that may or may not be required in practice.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development.	
Mums for Lungs	R0501	Site Allocation Policy	<p>We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document.</p> <p>We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings.</p> <p>As acknowledged by Lambeth cabinet last November, "Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough." Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document.</p> <p>Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.</p>	<p>One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes'. These strategic overarching principles are also applicable to the SADPD PSV.</p> <p>The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy SI1. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.</p> <p>The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth's Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council's work.</p>
Mums for Lungs	R0501	Transport	<p>Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough.</p> <p>We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?</p>	Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.
Mums for Lungs	R0501	Transport	<p>In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.</p> <p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It's equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p>	<p>In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking.</p> <p>Other London Plan policies will be applicable, such as Policy T1 'Strategic approach to transport', T2 'Healthy streets' and T5 'Cycling', that set the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth council so that they become a tangible, positive reality for everyone living and working in the borough.</p>	
Gerald Eve on behalf of Stanhope PLC	R0584	Vision	<p>We write on behalf of Stanhope PLC to make representations to the Proposed Site Allocation 1, part of the Draft Lambeth Site Allocations Development Plan Document (SADPD).</p> <p>Site Allocation 1 is identified as Royal Street SE1 and is located in the northern part of the London Borough of Lambeth opposite to St Thomas' Hospital. The proposed site allocation comprises various sections titled, vision, site allocation policy wording, vision map, context, context map, evidence and sustainability appraisal. Each of these documents have been reviewed and comments are provided within this response where considered necessary.</p> <p>As officers are aware, Stanhope PLC have been progressing a scheme on the site as part of a Joint Venture with the Guy's and St Thomas' Foundation that will deliver a holistic masterplan providing lab enabled commercial space, residential, retail and community floorspace; enhanced public realm and pedestrian routes. The scheme will play a key part in the delivery and success of the SC1 innovation district.</p> <p>The proposals have been subject to a series of ongoing pre-application meetings with Lambeth officers since 2019 and more recently with the Greater London Authority and Historic England.</p> <p>Policy Background</p> <p>Paragraph 35 of the National Planning Policy Framework February 2021 identifies that Plans are "sound" if they are:</p> <p>(a) Positively prepared – provided a strategy which, as a minimum seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p>	Support for vision noted.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>(c) Effective – deliverable over the planned period and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>(d) Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this framework.</p> <p>Paragraph 11 of the NPPF states plans and decisions should apply a presumption in favour of sustainable development. “For plan making” this means that:</p> <p>(a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;</p> <p>(b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless;</p> <p>(i) The application of policies in this framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</p> <p>(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.”</p> <p>Paragraph 15 notes that inter alia up-to-date plans should provide a framework for addressing housing needs and other economic, social and environmental priorities.</p> <p>At paragraph 16 it is noted that plans should “be prepared positively, in a way that is aspirational but deliverable”... and “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”.</p> <p>The Draft Vision</p> <p>The proposed draft vision in regard to Site Allocation 1 states:</p> <p>“This key site provides a significant opportunity to contribute to the growth of the Waterloo SC1 cluster, linked to local hospitals and universities and supporting population health and well-being, life-sciences (including MedTech) and complementary sectors such as artificial intelligence; the growing cluster of low carbon industries in this part of Lambeth; and the evolution of the South Bank and Waterloo creative cluster. Public benefits will include new affordable housing, plus affordable workspace and employment and training opportunities for local people within those growing sectors.</p>	

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>High quality development of exemplary design will express a clear vision and strong ambition for environmental sustainability and health and well-being in the built environment, including public realm and connections to the wider neighbourhood. This will address the currently discordant and incomplete urban realm in this part of the Waterloo Opportunity Area, creating a new place of distinct character, which: preserves or enhances the setting and Outstanding Universal Value of the Westminster World Heritage Site; is exemplary in achieving net zero carbon; achieves excellent levels of urban greening; improves the entrance to Archbishop's Park; provides routes through that integrate positively with pedestrian and cycle routes and networks, including Healthy Routes, Greenways and the Low Line; and significantly enhances the environmental quality and pedestrian experience along perimeter roads, particularly Lambeth Palace Road".</p> <p>Stanhope PLC fully support and share the aspirations for the site outlined by Lambeth in the proposed vision.</p>	
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	<p>SEE SAVED ATTACHMENT FOR TRACKED CHANGES</p> <p>Draft Site Allocation Policy</p> <p>The proposed draft site allocation policy includes reference to a number of matters which are considered in turn:</p> <p>1) Land Uses</p> <p>The proposed policy wording in regard to land uses states:</p> <p>"Development should include no fewer than 129 self-contained residential units, to replace the existing quantum of homes on the site. In addition, the site has potential to accommodate:</p> <ul style="list-style-type: none"> - office floorspace, including approximately 30 per cent that is lab-enabled to contribute to the growth of the SC1 cluster linked to hospitals and universities - flexible spaces at ground floor level to activate frontages, providing a range of unit sizes and type - cultural uses to contribute to the evolution of the South Bank and Waterloo cultural cluster <p>Given the majority of the site falls outside the Waterloo CAZ retail cluster, this site should not primarily be a retail destination. Applications should demonstrate there would be no harmful impact on the role and special character of the Lower Marsh/the Cut/Leake Street Special Policy Area as a centre for local needs and specialist independent retail".</p> <p>The site will play a major strategic role in delivering and supporting the SC1 London Health Science District and the development of innovative medical treatments and talent. The vision is to create a life sciences district in south east London which will attract global partners and</p>	Reference to SC1 accepted and added. 'The' not added to maintain consistency with other site wording. Reference to facilities and community spaces largely accepted and wording amended.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>ensure that medical science research, education and patient care are at the forefront of life science innovation. This is considered to be a significant asset and benefit to Lambeth which should be given more weight in the proposed wording.</p> <p>Furthermore, Stanhope PLC agree that the site has the potential to support the cultural evolution of the South Bank and Waterloo cultural cluster. It is considered that this can be done through the provision of community spaces or other facilities which can provide areas for exhibitions, shows and talks.</p> <p>In order to accommodate the points noted above it is proposed that the wording in regard to land uses should state:</p> <p>"Development should significantly support the delivery of the Waterloo SC1 cluster and should include no fewer than 129 self-contained residential units, to replace the existing quantum of homes on the site. In addition, the site has the potential to accommodate:</p> <ul style="list-style-type: none"> - office floorspace, including approximately 30 per cent that is lab-enabled to contribute to the growth of the SC1 cluster linked to hospitals and universities - flexible spaces at ground floor level to activate frontages, providing a range of unit sizes and type - cultural uses facilities and community spaces to contribute to the evolution of the South Bank and Waterloo cultural cluster <p>Given the majority of the site falls outside the Waterloo CAZ retail cluster, this site should not primarily be a retail destination. Applications should demonstrate there would be no harmful impact on the role and special character of the Lower Marsh/the Cut/Leake Street Special Policy Area as a centre for local needs and specialist independent retail".</p>	
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	<p>2) Affordable housing and affordable workspace</p> <p>The proposed policy wording in regard to affordable housing and affordable workspace states:</p> <p>"The affordable housing threshold is 35 per cent. At least 10 per cent of the net uplift in office floorspace must be provided as affordable workspace at a 50 per cent reduction from market values for a period of 15 years, or a level of on-site provision of equivalent value (see Local Plan Policy ED2). This should include on site: a proportion of the lab-enabled space (wet and dry); research and development business incubator space to support small business growth including life-science spinout or start-up activity; cultural uses; a skills and education hub linked to the life sciences sector. This cannot include general Class E space or other community uses. The affordable workspace provision on site should take account of the latest life-science industry requirements,</p>	Support for provision of affordable housing and affordable workspace on the site noted. Support for affordable workspace wording noted.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			demand and evidence of market failure in the supply of space for that sector. This should also take particular account of affordable workspace and incubator space provision on the St Thomas' hospital campus". Stanhope PLC are supportive of the provision of affordable housing and affordable workspace on the site. In terms of affordable workspace, it is welcomed that this is clarified as on the basis of 10% of the net uplift in office floorspace and it is supported that this could be made up of a bespoke policy equivalent offer.	
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	3) Social infrastructure There are no comments in respect of the wording proposed in regard to social infrastructure.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	4) Employment and skills There are no comments in respect of the wording proposed in regard to employment and skills.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	5) Digital connectivity There are no comments in respect of the wording proposed in regard to digital connectivity.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	6) Heritage assets The proposed policy wording in regard to heritage assets states: "Development should have regard to the significance (including setting) of heritage assets. In particular: • Preserve or enhance the Outstanding Universal Value, authenticity and integrity of the Westminster World Heritage Site; and preserve or enhance the setting of the Albert Embankment Conservation Area and the South Bank Conservation Area by: - Having a height and massing which is not distracting or visually discordant in the cityscape - Ensuring the architectural forms are calm and recessive - Using a palette of materials which closely mimics the appearance of Portland stone in views from across the river. • Preserve or enhance the character or appearance of the Lambeth Palace Conservation Area by: - Retaining former School, Carlisle Lane - Retaining former Institute at no. 10 Royal Street - Delivering a high-quality building on the car park site which responds positively to the character of the conservation area in terms of height, appearance and materials. • Preserve or enhance the setting of the Lower Marsh Conservation Area by:	The SADPD objectives have always sought a 'no heritage harm' outcome. The starting point is that the buildings are positive contributors to the Conservation Area and there is thus a presumption in favour of retention. It is for an applicant, at application stage, to make a case for demolition.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<ul style="list-style-type: none"> - Ensuring building heights are not unduly dominant - Ensuring an interesting roofline in views south along Lower Marsh • Preserve the significance (setting) of Lambeth Palace garden. • Preserve the significance (setting) of Archbishop's Park". <p>As mentioned in the vision, the site is of significant strategic importance in terms of the delivery of the SC1 Innovation District whose success is largely dependent on the success of the scheme that comes forward at Royal Street. The site has the potential to deliver numerous public benefits to Lambeth and more widely London in terms of supporting the global city through the delivery of a global medtech hub.</p> <p>The existing buildings are comprised of dated accommodation that do not optimise the potential prime location of the site nor support the ambitions of the SC1 cluster. Furthermore, each building on the Site has been granted a Certificate of Immunity from Listing by Historic England in 2021.</p> <p>To realise the full potential of the site, it is considered that amendments are required to the proposed wording to allow for flexibility in terms of the retention of the existing buildings.</p> <p>As the Holy Trinity building and 10 Royal Street are located within the Lambeth Palace Conservation Area, they are protected by a strong framework in law and policy protecting heritage assets.</p> <p>The existence of the Lambeth Palace Conservation Area itself provides a strong framework to ensure that future development management decisions will require the most careful consideration of the position of the former school in Carlisle Lane and the former Institute at Royal Street. In particular section 72(1) of the Conservation Areas and Listed Buildings Act 1990. This is the subject of very clear, fully up-to-date, authoritative guidance from the Courts which emphasises the importance of the special attention required to be paid by virtue of the statutory presumption placing special attention on the desirability of preserving or enhancing the character or appearance of conservation areas.</p> <p>The requirement to retain 10 Royal Street and the Holy Trinity Urban Centre is considered to introduce a significant constraint in limiting the potential to masterplan Site 1 to an unnecessary degree. Chapter 16 of the NPPF (2021) provides a highly resilient, well-understood code for the protection of heritage. These two properties are undesignated heritage assets which risk distorting future development control decision-making by being elevated above a level warranted by them. In order to provide more flexibility we have set out two potential options to achieve this.</p> <p>Option 1</p>	

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>Amend the wording to:</p> <ul style="list-style-type: none"> • Preserve or enhance the character and or appearance of the Lambeth Palace Conservation Area including by: <ul style="list-style-type: none"> - Either retaining the former school, Carlisle Lane, or demonstrating a convincing public benefits case for any proposal that does not retain it Retaining former School, Carlisle Lane - Either retaining the former Institute at no. 10 Royal Street, or demonstrating a convincing public benefits case for any proposal that does not retain it Retaining former Institute at no. 10 Royal Street - Where a proposal does not retain the former school, Carlisle Lane or 10 Royal Street, it should deliver a high-quality building (or buildings) which respond positively to the character and appearance of the conservation area in terms of height, appearance and materials. - Delivering a high-quality building on the car park site which responds positively to the character of the conservation area in terms of height, appearance and materials. <p>Paragraph 202 Of the NPPF requires that “where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.</p> <p>Therefore, should the proposals result in any harm to the heritage assets, public benefits should be delivered to outweigh that harm. The revised wording above in this regard makes clear that if the former school on Carlisle Lane and the former Institute at no. 10 Royal Street cannot be retained, a convincing public benefits case would need to be made.</p> <p>Furthermore, it is considered that with carefully considered design and materiality, new buildings on the site will be able to preserve or enhance the appearance of the Lambeth Palace Conservation Area which is also reflected in the proposed wording above.</p> <p>Option 2</p> <p>Another way of amending the policy wording to increase flexibility would be to remove reference to the retention of 10 Royal Street and Holy Trinity all together. As mentioned above, the buildings are already protected by a strong legal framework and as the drafted policy wording does not cite all positive contributors to the Lambeth Palace Conservation Area, it is suggested that the draft policy does not need to include the bullets on Holy Trinity and 10 Royal Street.</p> <p>Suggested wording below:</p> <p>“Development should have regard to the significance (including setting) of heritage assets and their setting. In particular:</p>	

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<ul style="list-style-type: none"> • Preserve or enhance the Outstanding Universal Value, authenticity and integrity of the Westminster World Heritage Site; and preserve or enhance the setting of the Albert Embankment Conservation Area and the South Bank Conservation Area by: <ul style="list-style-type: none"> - Having a height and massing which is not distracting or visually discordant in the cityscape - Ensuring the architectural forms are calm and recessive - Using a palette of materials which closely mimics the appearance of Portland stone in views from across the river. • Preserve or enhance the character and or appearance of the Lambeth Palace Conservation Area by: <ul style="list-style-type: none"> - Retaining former School, Carlisle Lane - Retaining former Institute at no. 10 Royal Street - Delivering a high-quality scheme which responds positively to the character and appearance of the conservation area in terms of height, appearance, and materials. - Delivering a high-quality building on the car park site which responds positively to the character of the conservation area in terms of height, appearance and materials. • Preserve or enhance the setting of the Lower Marsh Conservation Area by: <ul style="list-style-type: none"> - Ensuring building heights are not unduly dominant - Ensuring an interesting roofline in views south along Lower Marsh • Preserve the significance (setting) of Lambeth Palace garden. • Preserve the significance (setting) of Archbishop's Park". 	
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	<p>7) Building heights and views; townscape</p> <p>The proposed policy wording in regard to building heights and views; townscape states:</p> <p>"The site is appropriate for tall buildings in the locations shown in Local Plan Annex 10. Development should integrate the buildings into its context sensitively by:</p> <p>In locations appropriate for a tall building:</p> <ul style="list-style-type: none"> • Achieving a general building height of 60m AOD on the site of Becket House (Annex 10 location W7). • Achieving a general building height of 50m AOD on the sites of Stangate House and Canterbury House (Annex 10 location W8). <p>To ensure flexibility around these heights it is suggested that a further bullet point is added such as:</p> <ul style="list-style-type: none"> • Proposed buildings in excess of these heights will need to demonstrate their acceptability in relation to their impacts. <p>Away from these tall building locations:</p> <ul style="list-style-type: none"> • There should be a fall in building heights towards the southern edge of 	Not accepted. Given the high sensitivity of the site in relation to the Westminster World Heritage Site, and other designated heritage assets, clear parameters on height are considered particularly justified in this case. Any application that deviates from the SADPD policy would have to be treated on its merits as a departure.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>the site adjacent to Archbishop's Park to preserve or enhance the character and appearance of the Lambeth Palace Conservation Area, and the openness of Archbishop's Park. Development should also address the following principles:</p> <ul style="list-style-type: none"> • Provide activation and animation at ground floor, including to the facades onto the perimeter streets • Ensure the route from the north-east gate of the park northwards along Carlisle Lane remains an attractive, safe and overlooked one for pedestrians including: <ul style="list-style-type: none"> - Urban greening - Pocket parks / informal seating - Generous footways • Improve the public approach and visibility of the north-east entrance to Archbishop's Park (from Carlisle Lane). • Maintain the historic route of Upper Marsh". <p>It is considered that the last paragraph of the proposed wording in respect of pedestrian routes and sub-topics relating to urban greening would better sit in the proposed policy wording for Transport, movement and public realm and also Urban Greening.</p>	
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	8) Transport, movement and public realm. There are no comments in respect of the wording proposed in regard to transport, movement and public realm.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	9) Community safety There are no comments in respect of the wording proposed in regard to community safety.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	<p>10) On-site residential amenity The proposed policy wording in regard to on-site residential amenity states: "Residential accommodation should meet all relevant internal and external amenity standards and requirements as set out in London Plan and Local Plan policy and guidance". Stanhope PLC agree that the residential accommodation to be provided on-site should be comprised of the highest standards achievable. The site is located within a highly urban context and so flexibility may be required for instances where it may not be possible to fully achieve compliance with every standard for each dwelling, but where the proposals still include the overall provision of high quality accommodation. It is proposed that the policy wording should be revised to state: "Residential accommodation should meet be designed to a high</p>	Not accepted. The word 'should' rather than 'must' already provides flexibility to take account of site circumstances. This is stronger wording than 'having regard to' and this approach is considered appropriate for this sensitive site.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			standard having regard to all relevant internal and external amenity standards and requirements as set out in London Plan and Local Plan policy and guidance”.	
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	11) Neighbour relationships There are no comments in respect of the wording proposed in regard to neighbour relationships.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	12) Flood risk mitigation There are no comments in respect of the wording proposed in regard to flood risk mitigation.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	13) Energy and sustainability There are no comments in respect of the wording proposed in regard to energy and sustainability.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	14) Waste management There are no comments in respect of the wording proposed in regard to waste management.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	15) Air quality There are no comments in respect of the wording proposed in regard to air quality.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	16) Access to open space and nature conservation There are no comments in respect of the wording proposed in regard to access to open space and nature conservation.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Site Allocation Policy	17) Urban greening and trees There are no comments in respect of the wording proposed in regard to urban greening and trees.	Noted.
Gerald Eve on behalf of Stanhope PLC	R0584	Evidence	We have reviewed the Evidence (January 2022) published alongside the Proposed Site Allocation and wanted to set out the following proposed clarifications: - Where referred to, Stangate House should be ‘Stangate’.	Accepted.
Gerald Eve on behalf of Stanhope PLC	R0584	Evidence	Paragraph 2.4 – states the “school dates from the 1850s”. There is very little remaining from this time. On this basis we consider that this should be clarified to state “and was significantly altered later in the 19C and subsequent years”.	Accepted.
Gerald Eve on behalf of	R0584	Evidence	Figure 16 – we consider that the caption should also reference the significantly altered footprint of the school on the later map.	Accepted.

Officer Response to Reg 18 Representations: Site 1 – Royal Street SE1

Respondent	ID	Draft SADPD Section	Comment	Officer response
Stanhope PLC				
Gerald Eve on behalf of Stanhope PLC	R0584	Evidence	Paragraph 2.14 – Building Heights –Stangate, Canterbury house and Beckett House should be mentioned here (as they are under Building Uses).	Accepted.
Gerald Eve on behalf of Stanhope PLC	R0584	Evidence	Paragraph 2.16 – this should state that the 'south of the river' sculpture is the only 'listed structure' on the site (rather than 'designated heritage asset' – because of the Conservation Area on the site)	Accepted.
Gerald Eve on behalf of Stanhope PLC	R0584	Evidence	Paragraph 2.35 – this should state 'south of the river' (not 'border').	Accepted.
Gerald Eve on behalf of Stanhope PLC	R0584	Evidence	Page 41 – the text for view 27B.1 states that the indicative scheme matches the height of Urbanest, but it is 60m and therefore visibly slightly lower. We consider that the text should state that the indicative scheme is slightly lower than the height considered acceptable in this view (which is 66m).	Accepted.
Historic England	R0654	Other	We would like to discuss sites 1 and 2 with our London Advisory Committee and we may have additional comments to make which I hope we can provide before the next version of the plan is finalised. We appreciate that these can only be informal comments in the absence of a consultation.	Noted.
Historic England	R0654	Evidence	We advise that a Heritage Impact Assessment (HIA) that reflects the ICOMOS HIA Guidance is submitted in support of the St Thomas's Hospital site and Royal Street site allocations. We have concerns that the cumulative impacts of these developments, alongside others that have been approved, will result in harm to the Westminster World Heritage Site (WWHS). The Operational Guidelines for the Implementation of the World Heritage Convention (2019) stress the importance of Heritage Impact assessment, noting at paragraph 118 that these should "be a pre-requisite for development projects and activities that are planned for implementation within or around a World Heritage property".	We have undertaken further comprehensive work on this matter. See revised evidence. Requirement for a Heritage Impact Assessment added.
Historic England	R0654	Evidence	A master planning exercise for all sites across the hospital campus might be a helpful way of understanding how development could be distributed across the area rather than focusing on a building by building approach. This might help deliver similar amounts of development with lesser impacts.	The hospital does not currently have a masterplan and the two sites are in separate ownership. The site allocation focuses on the most sensitive part of the campus that would most benefit from a planned approach to development.
Historic England	R0654	Evidence	Site 1: Royal Street We note that the heights accord with the Local Plan, but that does not	Accepted. Following further evidence work we have now identified maximum heights. General building heights changed to maxima.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			necessarily mean that they will be wholly acceptable across the entire site, particularly when a new development has been approved since the local plan was adopted which will have an impact on what other sites in the area can then accommodate sustainably. The policy wording refers to "general building height", we advise that the plan expresses this as a maximum height and requires any development proposals to be based on cumulative impacts.	
Historic England	R0654	Evidence	The maximum height might be achievable in certain parts of the site, but a consistent height horizontally across the site, as indicated in figure 20 of the evidence paper, may be more problematic as shown in the TVIA images.	Accepted. We have added text stating that an indicative height may not be possible across a whole site. Additionally, we have looked again at the model massing. However, the evidence work is just an 'indicative approach' and it should not be given great weight. It is purely undertaken to identify parameters and is not a proposal. Other changes made to protect the silhouette of Elizabeth Tower will have the effect of suppressing height across parts of the site and will address this point.
Historic England	R0654	Evidence	Building heights vary within the locality but are lower to the south of the site, we welcome the development requirement to reduce height to the southern part of the site, but the indicative images show the height reducing quite suddenly rather than a gradual stepped down approach. As above the indicative diagrams show constant building heights, at the maximum height, associated with each "block" whereas a more varied approach might help mitigate their impact upon the historic environment.	Accepted. We have revised the Indicative Approach model accordingly. However, it should be remembered that the evidence work is just an 'indicative approach' and is purely undertaken to identify parameters and is not a proposal.
Historic England	R0654	Evidence	The TVIA images have modelled the approved Evelina Hospital development, but the impacts have not been assessed and the evidence does not address the implications of the approval and cumulative harm that might arise.	Accepted. We have undertaken further cumulative impact assessment. See evidence document.
Savills on behalf of Guy's and St Thomas' Foundation	R0804	Other	SEE SAVED ATTACHMENT FOR TRACKED CHANGES Thank you for giving us the opportunity to comment on the emerging draft Site Allocations Development Plan Document (DPD) (Regulation 18). We write on behalf of Guy's and St Thomas' Foundation which owns a 5.4 acre site in the Waterloo area referred to as the Royal Street site. Established over 500 years ago, the Foundation's purpose is to improve the health of people in the London boroughs of Lambeth and Southwark, two of the UK's most diverse and deprived areas. This is achieved through the Foundation working with a range of partners to identify, test and scale new approaches to health and healthcare, and by supporting Guy's and St Thomas' NHS Foundation Trust through a combination of fundraising and the Foundation's own philanthropic support. The Foundation has an endowment of over £800m of assets which forms the backbone of its resources. A considerable part of this	Support for approach and strategy for growth noted.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>comprises the Foundation's property portfolio, which includes significant land holding in Lambeth.</p> <p>With regards to the Royal Street site the entire site falls within Proposed Site 1 Royal Street SE1, as set out on in the draft Site Allocations DPD.</p> <p>The Foundation has previously engaged in the rounds of public consultation for the newly adopted Local Plan, and look forward to continuing to develop an appropriate framework to create the certainty of outcome required to enable this key site to be brought forward for development with confidence.</p> <p>In addition to engagement with the Local Plan process, the Foundation, in a Joint Venture with its development partner Stanhope PLC, has been engaged in pre-application discussions about proposals for the redevelopment of this site. The scheme will deliver a holistic masterplan providing lab enabled commercial space, residential, retail and community floorspace; enhanced public realm and pedestrian routes. The scheme will play a key part in the delivery and success of the SC1 innovation district.</p> <p>Separate representations to this consultation have been made by Gerald Eve on behalf of Stanhope PLC. The Foundation is in full support of Stanhope's position and would ask that it is taken into consideration as part of the consultation process.</p> <p>The Foundation recognises the importance of the planning policy framework to help it and its partners realise their respective ambitions for growth and expansion. In large, the Foundation is generally supportive of the Council's approach and strategy for growth set out in the draft Site Allocations DPD.</p> <p>We appreciate that many of our comments made during the Local Plan consultations have been taken into account, with the alternation of the red line site boundary, as well as the removal of an erroneous reference to existing affordable housing in the existing uses.</p> <p>However, concerns remain with discrete elements of the site allocation policies which we comment on below. Where concerns are raised which we consider could prejudice the Foundation's ability to realise its ambitions, we have suggested proposed amendments to the DPD ahead of the next round of consultation.</p>	
Savills on behalf of Guy's and St Thomas' Foundation	R0804	Site Allocation Policy	<p>Land uses</p> <p>We broadly support the proposed draft vision and share the same ambitions for the site.</p> <p>Notwithstanding this, we consider there to be an opportunity to strengthen the wording with regard to land uses where reference ought to be made to the potential this site has to support the SC1 London Health Science District. In addition, where the Council is seeking to</p>	<p>Reference to SC1 accepted and added.</p> <p>'The' not added to maintain consistency with other site wording.</p> <p>Reference to facilities and community spaces largely accepted and wording amended.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>support the evolution of the South Bank and Waterloo cultural cluster, we consider this can be achieved through the provision of supporting uses that facilitate the delivery of cultural uses.</p> <p>In order to accommodate this, we recommend that policy wording should be amended to state:</p> <p>“Development should significantly support the delivery of the Waterloo SC1 cluster and should include no fewer than 129 self-contained residential units, to replace the existing quantum of homes on the site. In addition, the site has the potential to accommodate:</p> <ul style="list-style-type: none"> - office floorspace, including approximately 30 per cent that is lab-enabled to contribute to the growth of the SC1 cluster linked to hospitals and universities - flexible spaces at ground floor level to activate frontages, providing a range of unit sizes and type - cultural uses supporting uses that to contribute to the evolution of the South Bank and Waterloo cultural cluster <p>Given the majority of the site falls outside the Waterloo CAZ retail cluster, this site should not primarily be a retail destination. Applications should demonstrate there would be no harmful impact on the role and special character of the Lower Marsh/the Cut/Leake Street Special Policy Area as a centre for local needs and specialist independent retail”.</p>	
Savills on behalf of Guy's and St Thomas' Foundation	R0804	Site Allocation Policy	<p>Heritage assets</p> <p>We broadly support the Heritage policy, which seeks to preserve and enhance the Lambeth Place Conservation Area. Notwithstanding this, the policy with relation to Heritage Assets states that:</p> <p>“development would have regard to the significant (including setting) of heritage assets. In particular:... preserve or enhance the character or appearance of the Lambeth Palace Conservation Area by; Retaining former Institute at no.10 Royal Street”</p> <p>The Foundation acknowledges that the Lambeth Place Conservation Area Character Appraisal recognises the building as a positive contributor to the Conservation Area, and it should be noted that we do not dispute this notion.</p> <p>Despite this, the contribution of the building was discussed at length during the appeal for the proposals on the Founders Place site, granted planning permission by the Secretary of State on 10 October 2007 following a public inquiry.</p> <p>The Inspector's report to the Secretary of State for Communities and Local Government (18 June 2007), stated that the case for the demolition of 10 Royal Street was 'overwhelming'. While we are aware that this report was published prior to the first publication of the NPPF,</p>	<p>The previous appeal was some time ago. Since then up-to-date conservation area appraisals have been undertaken which have concluded that the 10 Royal Street is a positive contributor. The best-practice approach is to retain such buildings. The Council's strong preference is to follow best practice and to leave it to an applicant to make a case for demolition. Each case will have its own unique public benefits and it is for the decision maker therefore to reach a conclusion on whether demolition (and the resulting heritage harm) is off-set by those benefits. No change.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>the sites surrounding context has not been subject to any great material change. The Inspector concluded this on the basis that no objections to the demolition had been received from English Heritage (a statutory consultee), the Commission for Architecture and the Built Environment and the Mayor. Furthermore, the Inspector noted that the Council's conservation officers were of the that view that demolition of the buildings would not harm the conservation area.</p> <p>In relation to the above, Paragraph 202 of the NPPF (2021) is relevant, given it allows local planning authorities to undertake a balancing exercise weighing less than substantial harm to the significance of a designated heritage asset against public benefits:</p> <p>"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".</p> <p>Paragraph 35 of the NPPF, sets out the requirements for examining emerging policy documents, stating that plans will only be sound should they be positively prepared, justified, effective and consistent with national policy. Consequently, on this basis we consider the plan as drafted is unsound, as it fails to meet the tests set out in Paragraph 35, as it does not reflect paragraph 202 as stated above.</p> <p>As such, where it can be demonstrated that development proposals cause less than substantial harm to the Lambeth Palace Conservation area and that the proposals bring about public benefits and secure optimum viable use of the site, there ought to be sufficient flex in the policy to allow this balancing exercise to be undertaken.</p> <p>To align with national policy, we, therefore, propose the following amendments, as laid out below:</p> <p>Proposed Amendment</p> <p>"Development should have regard to the significance (including setting) of heritage assets and their setting. In particular:</p> <ul style="list-style-type: none"> • Preserve or enhance the Outstanding Universal Value, authenticity and integrity of the Westminster World Heritage Site; and preserve or enhance the setting of the Albert Embankment Conservation Area and the South Bank Conservation Area by: <ul style="list-style-type: none"> - Having a height and massing which is not distracting or visually discordant in the cityscape - Ensuring the architectural forms are calm and recessive - Using a palette of materials which closely mimics the appearance of Portland stone in views from across the river. • Preserve or enhance the character and or appearance of the Lambeth Palace Conservation Area including by: 	

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			<ul style="list-style-type: none"> - Either retaining the former school, Carlisle Lane, or demonstrating a convincing public benefits case for any proposal that does not retain it Retaining former School, Carlisle Lane - Either retaining the former Institute at no. 10 Royal Street, or demonstrating a convincing public benefits case for any proposal that does not retain it Retaining former Institute at no. 10 Royal Street - Where a proposal does not retain the former school, Carlisle Lane or 10 Royal Street, it should deliver a high-quality building (or buildings) which respond positively to the character and appearance of the conservation area in terms of height, appearance and materials. - Delivering a high-quality building on the car park site which responds positively to the character of the conservation area in terms of height, appearance and materials. • Preserve or enhance the setting of the Lower Marsh Conservation Area by: <ul style="list-style-type: none"> - Ensuring building heights are not unduly dominant - Ensuring an interesting roofline in views south along Lower Marsh • Preserve the significance (setting) of Lambeth Palace garden. • Preserve the significance (setting) of Archbishop's Park". 	
Savills on behalf of Guy's and St Thomas' Foundation	R0804	Site Allocation Policy	<p>Building Heights and Views; Townscape</p> <p>We fully support the site's identification as a location appropriate for tall buildings. Despite this, the policy goes on to state that in these appropriate locations, development should integrate the buildings into their context sensitively by:</p> <p>"Achieving a general building height of 60m AOD on the site of Becket House (Annex 10 location W7)"</p> <p>"Achieving a general building height of 50m AOD on the sites of Stangate House and Canterbury House (Annex 10 location W8)."Paragraph 117 of the NPPF encourages planning policies to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Furthermore, Paragraph 31 of the framework states that the preparation of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. A full and detailed assessment of the Local Plan evidence base was carried in 2018 out by City Designer (Richard Coleman Dip Arch ARB/RIBA/RIA). This concluded that prescribing height thresholds without considering design quality or a townscape approach is overly restrictive and in contrast to advice in the NPPF. It is noted that even in</p>	Not accepted. The representations made at Local Plan making stage were fully considered at that time. The case put forward was not accepted at that time and is considered closed. Given the high sensitivity of the site in relation to the Westminster World Heritage Site, and other designated heritage assets, clear parameters on height are considered particularly justified in this case. Any application that deviates from the SADPD policy would have to be treated on its merits as a departure.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>the London View Management Framework SPG, absolute height thresholds are only relevant to Landmark Viewing Corridors. Consultation Areas, River Prospects, Townscape and Linear Views should be considered qualitatively on a case-by-case basis. We therefore suggest that an additional bullet point within the policy is added, to ensure greater flexibility around these general building heights, reading as follows:</p> <p>Proposed Amendment</p> <p>Proposed buildings in excess of these heights will need to demonstrate their acceptability in relation to their impacts.</p>	
Savills on behalf of Guy's and St Thomas' Foundation	R0804	Site Allocation Policy	<p>Away from tall building locations, the draft policy states the following:</p> <p>"There should be a fall in building heights towards the southern edge of the site adjacent to Archbishop's Park to preserve or enhance the character and appearance of the Lambeth Palace Conservation Area, and the openness of Archbishop's Park."</p> <p>The Foundation recognises that the southern part of the site is considered to be a more sensitive location in terms of design due to the neighbouring heritage context and LVMF views. However, the wording in the draft allocation is considered to place too much emphasis on the building heights rather than the design of buildings responding to the local context. The London Plan design and tall building policies emphasise the importance of proposals following a design-led approach that promoted the highest architectural standard. As such we propose the wording is amended to the following:</p> <p>"There should be a fall in building heights towards the southern edge of the site adjacent to Archbishop's Park to preserve or enhance the character and appearance of the Lambeth Palace Conservation Area, and the openness of Archbishop's Park, buildings proposed in the southern part of the site should respond to the context and character of the local area."</p>	Accepted. Text amended in policy .
Savills on behalf of Guy's and St Thomas' Foundation	R0804		The written changes set out above should be reflected in any relevant maps in the Site Allocations document.	Noted. Maps will be updated alongside any text changes.
Savills on behalf of Guy's and St Thomas' Foundation	R0804	Other	<p>Summary</p> <p>In summary, the Foundation are broadly supportive of the aims and objectives of the draft Site Allocations Development Plan Document. However, we consider some areas of the Royal Street SE1 policy to be unsound according to Paragraph 35 of the NPPF.</p> <p>Our primary concerns lie around the notion to retain no. 10 Royal Street, which is a non-designated heritage asset. Where it can be</p>	Support for aims and objectives noted. Other points addressed above.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>demonstrated that development proposals cause less than substantial harm to the Lambeth Palace Conservation area and that the proposals bring about public benefits and secure optimum viable use of the site, there ought to be sufficient flex in the policy to allow this balancing exercise to be undertaken to reflect the NPPF. Additionally, it is our view that the prescription of general building heights, as well as the required drop in building heights to the south of the site should be amended to ensure proposals are considered on a discretionary basis, with primary regard to design and townscape. We thank you again for considering these representations and we would welcome a broader dialogue with officers to ensure that the potential of both the Foundation's Royal Street site, and the wider Waterloo area are captured in the emerging plan.</p> <p>We would be grateful for confirmation of receipt of these representations and would welcome the opportunity to discuss further with you.</p> <p>Please do not hesitate to contact us on the details at the head of this letter should you require any further information</p>	
Environment Agency	R0886	Other	<p>Current flood zone designation: 3 (in tidal breach modelling)</p> <p>Rivers on / adjacent to site / flood defences: No</p> <p>Permitted waste site within 250 metres: No</p> <p>Groundwater Source Protection Zone: No</p> <p>Comments to add into site allocation text: Protect groundwater from contamination sources. Contamination from adjacent railway.</p>	Accepted. Text changed accordingly.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	<p>Land Uses</p> <p>The site has the potential to accommodate more residential development, on top of the minimum number of 129 units replacing existing.</p>	Noted. The text states 'no fewer than 129' units and does not impose a ceiling on dwelling numbers, so it is not considered necessary to change this.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	<p>Does the area need this quantum of additional office space? What studies have been carried out to justify the total amount of office space currently planned for the area.</p>	Office development is prioritised in the Central Activities Zone under the London Plan, and the Waterloo Opportunity Area has a target for provision of new jobs. As such this site is expected to make a contribution towards both these policy objectives.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	<p>This site has the potential to deliver a much richer mix of activities that would make it a more balanced and sustainable new quarter within the Southbank and Waterloo area.</p>	The site allocation envisages a mix of uses. It requires housing to be provided and states that the site also has potential to accommodate offices (including lab space), flexible spaces at ground floor level to activate frontages, and cultural uses to contribute to the evolution of the South Bank and Waterloo cultural cluster.
South Bank and Waterloo	R1312	Other	<p>Although there is currently an ambition to deliver lab-enabled and potential MedTech workspace, there doesn't seem to be any</p>	This floorspace will be secured by condition or legal agreement on any planning permission for the site.

Officer Response to Reg 18 Representations: Site 1 – Royal Street SE1

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Neighbours (SoWN)			mechanism to ensure this use, should market conditions change. It shouldn't therefore be a justification for over-development of the site.	
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	There needs to be a distinct vision to deliver active frontages in this location. Ground floor units in large commercial developments often fail to deliver in this area.	The site allocation envisages flexible spaces at ground floor level to activate frontages, providing a range of unit sizes and types. The actual details of this will be assessed in detail through the planning application process.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	Affordable housing and workspace This site has the potential to meet a greater amount of the housing need in the area.	Noted. The text states 'no fewer than 129' units and does not impose a ceiling on dwelling numbers, so it is not considered necessary to change this. Office development is prioritised in the Central Activities Zone under the London Plan, and the Waterloo Opportunity Area has a target for provision of new jobs. As such this site is expected to make a contribution towards both these policy objectives.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	More work needs to be done to prove the need for the quantum of affordable workspace planned in this part of the borough. And, as it is time limited, the provision of affordable workspace does not deliver lasting benefit to the local community.	Affordable workspace is required by Local Plan Policy E2. The evidence to justify this policy was fully considered at examination of the Local Plan and was found to be sound.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	Heritage Assets The requirement to retain the former school and Institute is welcomed and supported.	Noted.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	The requirement to ensure that building heights are not unduly dominant is supported, but is contradicted by the suggested building heights north of Royal Street.	The tall building heights on the sites on the north side of Royal Street were agreed through the Local Plan making process and supported by a robust tall building and heritage evidence base which was accepted by the Inspector. Those heights are set out in Annex 10 of the Local Plan. That said, the approach to height here has been revisited in response to the setting of the Elizabeth Tower. Text amended to expand on design officer response and ensure the silhouette of Elizabeth Tower is protected.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	There should be a greater emphasis on the preservation of the setting and openness of Archbishop's Park. This public space is critical for the mental health and well-being of local residents, workers and visitors	Open space is protected by Local Plan Policy EN1 and the impact of any development on its setting would be considered as part of any planning application. SADPD text already includes a reference to preserving the openness of Archbishop's Park.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	Building heights, views and townscape The fall in building heights towards Archbishop's Park is supported. But there needs to be a much greater emphasis on the fact that the sites north of Royal Street need to be sub-divided and the massing broken down into different building plots.	The street layout to the north of Royal Street naturally creates two typical building blocks (Beckett House and Stangate House). This already makes for good townscape. The opportunity provided by the low-line along the viaduct presents greater opportunities for permeability. The Council's position is that sub-dividing the plots further is not necessary for good place making and would be unduly prescriptive in this case.

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South Bank and Waterloo Neighbours (SoWN)	R1312	Other	The local plan uses the phrase 'well spaced for good townscape'. This principle is key, as is the concept that not all buildings within this area should rise to the same height. Developers are too often taking the approach that entire city blocks and site outlines can just be extruded up to a maximum permitted height, with the only limit on development being derived from heritage, views and daylight/sunlight constraints.	The revised Indicative Approach varies the buildings heights across the site, in particular from north to south. The heritage constraints are numerous and given the sensitivity of the site these have rightly been one of the key drivers informing the policy development.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	There is little if any emphasis on principles of good urban design, the design of streets and public spaces and the spatial and environmental quality of the public realm.	The purpose of the SADPD is to elaborate on existing policy where it is considered necessary. In this instance the existing policy is considered sufficient and further content within the SADPD is not considered necessary.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	Current and proposed building massing along the strip of land to the west of the railway is creating an overlapping 'wall of buildings' around 60m tall separating the heart of Waterloo and Lambeth beyond from the river and the rest of London. This is harmful and hostile.	The heights on the sites on the north side of Royal Street were agreed through the Local Plan making process and supported by a robust tall building and heritage evidence base which was accepted by the Inspector. Those heights are set out in Annex 10 of the Local Plan. The evidence did not show those heights to be 'harmful and hostile'.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	The suitability of parts of this site for tall buildings also needs to be modified in light of the site allocation SA2 for St Thomas's hospital, which gives rise to the potential for a canyon like environment on Lambeth Palace Road.	The indicative approaches for both sites have been revisited. Tall building locations for this site were agreed at the Local Plan making stage. We have considered the cumulative effects of this site and St Thomas' Hospital. Site 2 requires development on Lambeth Palace Road to be set back 15m from the back edge of the pavement. It should be remembered that the Indicative Approach is not a detailed design. Policy Q7 already seeks to resist canyon-like townscape effect and any development that comes forward will need to consider it.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	Improved approach to the Park is supported.	Noted.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	The linking route of Upper Marsh needs to be improved, not just maintained. It was a flaw in the creation of Lambeth Palace Road that there isn't a more direct visual and physical link from this major road through to Lower Marsh. The development of this site offers the opportunity to correct this.	The current streetscape is quirky and rich. We consider this a strength rather than a weakness. Whilst legibility is often a legitimate aspiration, this should not be to the detriment of townscape richness and variety. For that reason we are not proposing the re-alignment of the roads on this site.
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	The vision could include a north/south link through from Upper Marsh to Archbishop's Park	The park already has two northern entrances - one to Lambeth Palace Road and one to Carlisle Lane. This makes it highly accessible. The proposed low-line extension will also improve wider connectivity. An additional route is not considered essential. Should such a route be proposed in future as part of an application it can be considered on its merits at that time.
South Bank and Waterloo	R1312	Other	The reliance on 'materials that mimic Portland stone' and 'red brick' as the way in which local 'character' can be expressed is a very limited way in which to relate development to its context and create a new	The reference to locally distinctive palette of materials is considered justified given the sensitivity of the site. The application stage is the best opportunity to consider the merits of intellectual and sophisticated approaches.

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Neighbours (SoWN)			urban quarter. This strategy needs a more intellectual and sophisticated approach. The concept is also undermined by the fact that white painted aluminium has been accepted as mimicking Portland stone in other approved applications.	
South Bank and Waterloo Neighbours (SoWN)	R1312	Other	We are also concerned that the evidence base suggests that 'pale, recessive architecture would be necessary to make some of the larger buildings acceptable or neutral. This implies that the building massing is not in fact acceptable, as 'recessive architecture' is not a sound basis for townscape development.	The principal driver for pale and recessive buildings is the sensitivity of views of the scheme from Westminster where it can be glimpsed in the background of the WWHS. The success of the St Thomas' Hospital YRM buildings and County Hall in these views (both are pale and recessive) is the reason for the approach taken.
Waterloo Community Development Group	R1318	Other	We strongly support the principle of a SA for these sites, given its history of neglect, the various unimplemented plans for it since the War, and the huge potential for residential and other uses these sites offer as a comprehensive development or as piecemeal development.	Support for principle of a site allocation noted.
Waterloo Community Development Group	R1318	Other	The sites were once a heavily residential area with a modest mix of other uses. The County of London Plan and the post-war CDA envisaged an extension to Archbishops Park, given that North Lambeth was designated an area of open space deficiency. With the loss of the Stangate Triangle – an area of open space now occupied by the hospital – this designation was carried into the Waterloo District Plan (1977) and the UDP (1998). However, the landowner – now known as G&ST Foundation – refused to come forward with the extension. Instead they were granted permission in 2007 following an Appeal inquiry for 600 homes, 50% of which would be affordable, i.e. 300 homes, the buildings of which were designed to be lower as they approached the Park, and included significant private green open space adjacent to the Park. Although we deeply regretted losing the un-listed 1847 school buildings and 10 Royal St, WCDG supported the Appeal on the basis of its optimised affordable residential component and its appropriate relationship to the Park	Commentary on planning history noted.
Waterloo Community Development Group	R1318	Other	We therefore partly support the Policy regarding its approach to the land south of Royal St: that the C19th buildings are retained, and that that part of the site is not appropriate for tall buildings.	Noted.
Waterloo Community Development Group	R1318	Other	However, we would insist that the site is not appropriate for buildings over 30m (the designation for tall buildings everywhere in London except Lambeth!), and that no buildings are developed adjacent to the Park (as in the indicative model) or are kept low, in keeping with the retained 1847 school and the magnificent row plane trees along the Park's northern boundary.	Noted. Part of the site is already identified as suitable for tall buildings (north of Royal Street) in the Local Plan. The perimeter Plane trees are protected by TPO.
Waterloo Community	R1318	Other	It is to be noted that the 40m high buildings on the edge of this area adjacent to Carlisle Lane are located on what is currently a piece of open space, which was recently sold by LBL to the G&STTF and must	Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan

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Development Group			be replaced somewhere on the site, as per policy on loss of open space in the NPPF, LP and LLP.	policies will apply to any planning applications that come forward for these sites.
Waterloo Community Development Group	R1318	Other	We do not agree with the 60m and 50m heights for parts of the site. While we acknowledge that this is in conformity with Annex 10 of the Local Plan, we believe that the modelling in the evidence base, as well as the emerging proposals in the current pre-app process subsequent to the EiP for the LP illustrate why such heights are not generally appropriate.	The local heights were supported by a robust evidence base that was accepted by the Local Plan Inspector. The approach is therefore considered sound and does not need to be re-opened given the recent date of Local Plan adoption (2021).
Waterloo Community Development Group	R1318	Other	We strongly support the policy re Urban Greening and Trees, as well as Heritage Assets.	Noted.
Waterloo Community Development Group	R1318	Other	<p>Land Use</p> <p>Although once heavily residential, the existing protected tenants were trammelled up into the two current residential blocks of Canterbury House and Stangate House, with all of the tenants enjoying protected rents akin to social housing. Although these tenancies have all expired over the past decade, given the history, the ownership by a health charity, and the evidence of the 2007 permission, we believe that a more significant part of the site should be given over to residential than envisaged, and that the majority of any residential should be affordable housing, to replace the 133 homes which were effectively affordable for the best part of a century. Waterloo's renaissance began in the 1970s with a battle over the amount of land given over to offices replacing what had been residential. What was successfully fought for were a mix and balance of land uses in the neighbourhood, which has stood Waterloo well and has become the blueprint for inner city regeneration everywhere. Having granted permission for nearly 3 million sq. ft. of office in Waterloo over the past decade, there is a potential imbalance of land uses emerging once again. We do not need more unaffordable housing – which simply attracts more investors without households or residents – but more affordable housing, including to house the key workers which keep the hospital and central London functioning. At the very least the replacement 129 units should be affordable; if, as a result of viability issues, this requires closer to 250 housing units in total being provided, that would be acceptable in order to achieve the 129 affordable homes.</p>	<p>It has been established that none of the existing housing on site is affordable housing, therefore there is no issue with loss of existing affordable housing under Policies H8 of the London Plan and H3 of the Local Plan.</p> <p>The replacement housing proposed will need to include new affordable housing in accordance with development plan policy. Local Plan Policy H2 requires affordable housing to be provided through the threshold approach set out in London Plan Policy H5.</p>
Waterloo Community Development Group	R1318	Other	Despite such a large amount of homes, the new Royal St quarter would be dominated by employment uses. However, as already stated, close to 3 million sq. ft. of office has been permitted in Waterloo in the past decade. We are not convinced that there is any need for more general office development of any scale. Nevertheless, specific MedTech uses	Office development is prioritised in the Central Activities Zone under the London Plan, and the Waterloo Opportunity Area has a target for provision of new jobs. As such this site is expected to make a contribution towards both these policy objectives.

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			are supported – including a very large amount of MedTech on that part of the site not developed by housing – although it remains unclear how that specific use (which has no specific use class) is secured through the planning process, other than building unconvertible lab-sized spaces in the lower floors. Such a mechanism or outcome needs to be specified in the SA. We also note that Site 2 St Thomas' is proposing MedTech.	Lab space will be secured by condition or legal agreement on any planning permission for the site.
Waterloo Community Development Group	R1318	Other	There will be a need for some social infrastructure, depending on how much housing is developed. The re-use of the 1847 school buildings and 10 Royal St would seem appropriate for this. This could be a good site for a community health provision; alternatively, funding for the upgrade of other existing social infrastructure would be welcome	Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites. Local Plan Policy S2 addresses new or improved social infrastructure.
Waterloo Community Development Group	R1318	Other	Redevelopment presents a great opportunity to create a clear straight avenue along Upper Marsh from the Lambeth Palace Rd all the way to Westminster Bridge Rd. This would mirror the generally straight form of Lower Marsh and of The Cut beyond, and the vistas such straight avenues open up (excellent views of the City's cluster of tall buildings open up along Lower Marsh and The Cut, for example). It would also offer a clear view of the proximity of the retail centre at Lower Marsh – in fact, such a view can already be enjoyed by standing on the steps of St Thomas' A&E and looking through the gap created by the raising of Stangate House (presumably for that purpose). The area south of Waterloo Station to Archbishops Park suffers from appalling illegibility and fails to join up with any other part of Waterloo apart from the Park itself: yet the clear pedestrian route from the UK's biggest transport hub at Waterloo Station to St Thomas' hospital – via Lower Marsh and Upper Marsh – would be obscured by this final kink as shown on the Proposed Vision map for Site 1. Please plan to create a straight view through the site to Lower Marsh (and from Lower Marsh to the hospital).	The current streetscape is quirky and rich. We consider this a strength rather than a weakness. Whilst legibility is often a legitimate aspiration, this should not be to the detriment of townscape richness and variety. For that reason we are not proposing the re-alignment of the roads on this site. Other benefits in keeping the current arrangement include the retention of street trees to the immediate north of Stangate House and the breaking down of the building frontage on Lambeth Palace Road into three clear parts - thus avoiding long frontages with canyon-like impacts.
Waterloo Community Development Group	R1318	Other	Lambeth Palace Rd at its northern end is a new cutting from the 1950s which gives poor legibility or comfort, with either 1960s buildings set back behind grass on both sides of the road, or huge curving buildings which have built right up to the curtilage of their site without front doors or a relationship with the street (e.g. the Urbanest building on the site of York House, and the Plaza on the island site). Lambeth Palace Rd desperately needs some definition from the new buildings which would come forward along this road on both sides (i.e. including Site 2). Both SAs need to say this clearly. This does not mean it needs a wall of development, as partly appears to be the case from the images of the indicative model (TVIA images 4 and 5, for example).	The objective with the Indicative Approach has been to provide definition and improved sense of enclosure along Lambeth Palace Road and at the same time ensure adequate set backs.
Waterloo Community	R1318	Other	The proposed buildings need to be broken up into a more human scale with meaningful public spaces between them.	The Indicative Approach has been revisited in terms of siting and building height and massing.

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Development Group				
Waterloo Community Development Group	R1318	Other	The views from the public viewing space on the 6th floor of the new Lambeth Library also needs to be taken into consideration.	The top floor of Lambeth Palace Library has a viewing terrace on its south eastern side. The stair core on its north western side limits views towards the site. Views from the viewing gallery south to Lambeth Palace and west towards the Palace of Westminster will be unaffected by development on the Site Allocation sites.
Waterloo Community Development Group	R1318	Other	In conclusion we strongly object to the proposed quantum of development envisaged for the site, as demonstrated as inappropriate through the indicative modelling.	The indicative approach modelling has been revisited.
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and</p>	Noted.

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			<p>time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole life-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>

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			Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.	
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> • Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO₂e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO₂e output. - 4-5% of the worldwide total of CO₂e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution • Steel Steel also has a significant impact on the environment: <ul style="list-style-type: none"> - It is CO₂e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and 	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building. In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			<p>should be recommended as build materials instead of emission heavy cement:</p> <ul style="list-style-type: none"> ● Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit “off-gas” toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. ● Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world’s riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber. 	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> ● Overheating, caused by the proliferate use of glass and a high concentration of inhabitants ● Increasing carbon energy required to offset this through mechanical ventilation ● Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) ● Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building 	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<ul style="list-style-type: none"> • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise ‘skyscraper’ buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development.</p> <p>The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p>
Lambeth Green Councillors	R1321	Sustainability Appraisal	<p>5. Loss of community, heritage, and cultural spaces</p> <p>An anticipated loss of community spaces is justified in the sustainability appraisal because the site proposals serve as a “more efficient use of land.” One example provided in the sustainability draft proposals as an “underutilised” use of land is Oasis Farm Waterloo, a farmyard community hub where vulnerable children, children with additional needs, and Looked-After Children are provided with animal, arts and cooking therapy and workshop. It is dismissed as an inefficient use of land. The farm works in partnership with Jamie’s Farm which has provided residential and day visits to farms, including the Waterloo branch, to thousands of vulnerable children across the UK, who have reported higher levels of self-esteem, school attainment, improved engagement and behaviour, and reduced risk of school exclusion, all helping to tackle the exclusion-prison pipeline.</p>	<p>In the case of Oasis Farm Waterloo, the Sustainability Appraisal recognises the current use, along with the meanwhile business and cultural spaces at Paradise Yard, provide value to the community. However, it is considered that redevelopment of the sort proposed is not only a more efficient use of land at this location but also a redevelopment that delivers exceptional health, economic and environmental benefits locally, regionally and nation-wide. The proposed scheme includes the extension of the new MedTech innovation cluster, the provision of affordable workspace and the expansion of cultural uses that contribute to the South Bank and Waterloo cultural and low carbon industries cluster.</p>
Lambeth Green Councillors	R1321	Sustainability Appraisal	<p>The development will also impinge on the famous Lower Marsh Street Market. The sustainability appraisal refers to an “uncertainty on the potential impact of the proposed site allocation on nearby small businesses in Lower Marsh” but legitimates this by listing anticipated</p>	<p>The Site Allocation Policy text has been amended in light of the representations received. It now clearly states that the site should not become a retail destination and that planning applications within the site should demonstrate there would be no harmful impact on the role and special</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			employment opportunities generated by the development and “positive effects on the economy.” We do not feel this adequately justifies the potential negative impact on one of the oldest and unique markets in London. The first known reference to the market dates to 1332 and has survived as a busy and unique cultural centre from then until now, despite nearly being destroyed in the 60s and 70s because of similar land development initiatives ⁹ . It would be a huge loss to the traders and customers of the market, the wider Lambeth community and those interested in the preservation of London history for the development to hinder or negatively impact the future of Lower Marsh.	character of the Lower Marsh/the Cut/Leake Street Special Policy Area as a centre for local needs and specialist independent retail.
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council's commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <p>1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p> <p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do</p>	Noted. Please refer to officer responses to previous points made as part of this representation.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p> <p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	
Individual	R1449	Vision	What about the diverse and vibrant current use of site by small enterprises?	Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites. Local Plan Policy S1 addresses safeguarding existing social infrastructure.
Individual	R1510	Vision	Over rules green requirements under Waterloo Neighbourhood Plan	Site Allocations will sit alongside the rest of the development plan, which includes the Neighbourhood Plan for the area.
Individual	R1421	Vision	Please consider in your planning, space for laundry facilities, cafes and restaurants and most important of all a supermarket. Having only accumulated living spaces without any type of the most important business around the area, it the only creates more pollution by the need to travel outside the area to find basic daily things. Again, Public laundries are essential in compressed areas where ventilation is needed to avoid mould within living spaces. Make Lambeth beautiful by introducing more green areas, flowers and regenerate those horrible	<p>The site is not within a defined town centre and, as such, there should not be a significant provision of main town centre uses on the site. Future residents will have easy access to the nearby shopping area in Lower Marsh.</p> <p>Development of this site will lead to environmental enhancements and add to the vitality of the area, with more people and active frontages that should reduce the incidence of crime.</p> <p>Comments about areas outside the site are noted. These do not form part of the site allocation.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>spaces under the railway bridge. Big example is Hercules Rd, The Council has closed the road half way through. This has absolutely damaged this part of the area as it's creating a wall where it attracts crime. The Rd should be re opened and properly re designing even if it's not for vehicles but at least make a proper street rather than creating divisions. The Traffic light outside Corner Cafe is also highly dangerous, a proper redesigning of traffic is urgently needed, such as a mini roundabout or a proper traffic system etc</p> <p>Fantastic as long as you bring decent people to the area such as professionals willing to live in the area. This area is one of the most multicultural, cosmopolitan overpopulated areas in the UK.</p> <p>One needs to consider crime here is also rampant due to poorly lit, run down corners in the area which is not very conducive to walk at night, specially women. Then again even small groups of people being attacked in plain day light, as recently witnessed. A woman being robbed by 3 men. Maybe the Council should take this into consideration when housing unwelcomed characters in such a great area.</p> <p>The idea of your project is great, however, personal safety assessment must be made, maybe introducing in your planning more street lighting and cameras. Introducing businesses such as pleasant business: Tesco's, Starbucks, cafes, restaurants, wine bars, pubs etc. So thieves are more reluctant to attack where more people are around at night.</p> <p>The area around Lambeth North tube, specially Hercules Rd, it's absolutely frightening, extremely run down and not very environmentally friendly with a car repair/washer under the Rail bridge. The amount of grease that comes out from there every day is appalling. The Council in its effort to hide this mess has even closed the street so cars don't go pass by. However, this will only attract more crime as it was in Lambeth Walk where the street was one divided. Instead efforts should be made to revamp the whole area rather than dividing it and only building where there's space available.</p> <p>There's The Plaza Hotel in Hercules Rd and it's really embarrassing when they turn to the left and see this mess. Not only embarrassing as this is a prime location in London, minutes away from Parliament and yet, the reality is different. Please bear this in mind in your planning.</p> <p>Council should introduce new health and safety measures for those corner shops where their business standard is very poorly presented and often very filthy and overcrowded.</p>	
Individual	R1421	Vision Map	<p>The idea to bring in taller buildings in the area is fabulous, However, create beautiful bright buildings instead of dull black bricks like the Plaza Hotel in Hercules Rd. It's absolutely depressing design in comparison to the other Plaza hotels in the area, this one is very grim,</p>	Noted.

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			dull and has NO character. Buildings with glass designs and light stone or light brick are more appealing, making this area a bit more brighter and leaving in a contemporary design of modern architecture. This would be a beautiful fusion of old and modern architecture, rather than keeping same uniform style, giving the impression that modern architecture has already died and there's a need to copy the same style forever.	
Individual	R1421	Site Allocation Policy	As long as wide paved illuminated paths are created within the park with the possibility of introducing cameras for us women to feel safe when walking through there after dark, specially in the winter where at 4.00 pm is already dark. Please take into consideration these points. Often pathways in parks are not asphalted and it can get very muddy when raining. Kindly make sure you have paths that are leading to all entrances, from every street or road. It would nice if you could also have proper signpost indicating entrances, and a map of the area. The entrance to the park from Lambeth Rd is totally subtle and people don't even realise there is a park behind those buildings.	Archbishop's Park does not form part of the site allocation. Comments about safety are noted. Development of the site allocation will lead to environmental enhancements and add to the vitality of the area, with more people and active frontages that should reduce the incidence of crime.
Individual	R1347	Vision	Development to be car free & new residents unable to purchase CPZ permits. People moving into designated. surrounding areas both from outside & within Lambeth to be unable to purchase CPZ permits. Car parking=car ownership=car use #climate emergency.	London Plan Policy T6 will apply. The development will be secured as car-free and all occupants (except Blue Badge holders) will be prevented from applying for parking permits
Individual	R1347	Vision	As elsewhere in London residential density to be achieved via walk up 5/6 storey development	Noted.
Individual	R1691	Vision	All sounds great but will depend on the scale and density of any development and the impact of this on the area as a whole and not as a generator of another cluster of tall buildings of nondescript design.	Noted.
Individual	R1694	Vision	A huge site that will choke residents and congest roads.	The development will be secured as car-free and all occupants (except Blue Badge holders) will be prevented from applying for parking permits, minimising vehicular trip generation.
Individual	R1694	Vision	It will as always only benefit a few in particular foreign investors who live 3 weeks a year in those flats.	The mix of homes will be fully considered at the time a planning application is brought forward on the site. Local Plan Policy H4 will apply, which acknowledges the need for family accommodation, in particular family-sized affordable homes.
Individual	R1410	Vision	What will happen to Iklectik, and outstanding community music venue? And the beautiful trees and plants here?	Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites. Local Plan Policy S1 addresses safeguarding existing social infrastructure.
Individual	R1729	Vision	Environmental sustainability?!!! There is an extensive sustainable community Arts Lab already on this site called IKLECTIK wich is utilised heavily by the community and by London at large. How are you intending to incorporate this into your so-called plan? Or are you going	Points addressed above.

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			to bulldoze down the importance of this project as so often is the case with the Arts in United Kingdom. Continuously disregarded and undermined. PLEASE STATE YOUR INTENTION FOR the IKLECTIK Arts premises!	
Individual	R1729	Other	This is already the site of an important sustainable community arts complex called IKLECTIK. How are you going to preserve our Art Complex which is well used and well-loved by our community and by London at large? Or are you going to be unethical as always and just bulldoze it down and plant flats where a much-loved Arts provision presides? MAKE SURE YOU GIVE US SOME ANSWERS. We are not agreeable to the site plans you are proposing here!!!	Points addressed above.
Mayor of London	R0852	Site Allocation Policy	<p>This site allocation supersedes the existing site allocation within the Local Plan 2021. It is located with the Waterloo Opportunity Area and the Central Activities Zone (CAZ) and contains 19,221 sqm of office floorspace.</p> <p>In accordance with Policy SD5 LP2021 residential or mixed-use development proposals should not lead to a net loss of office floorspace in any part of the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices.</p> <p>The Site Allocation should make clear the level of office space to be re-provided. We welcome the requirement for 10% of the net uplift in office floorspace for affordable workspace and the exclusion of E uses outside of the retail cluster.</p>	<p>Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites. Local Plan Policy ED1 addresses the retention of existing levels of office floorspace.</p> <p>The quantum set out in the draft DPD are approximate, informed by high-level testing of the optimum level of development that could in principle be accommodated on the sites. It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development plan. These development proposals will be assessed in detail through the planning application process.</p> <p>Support for affordable workspace and the exclusion of E uses is noted.</p>

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Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make.</p>	Noted.
Natural England	R0163	General	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	Noted.
Mums for Lungs	R0501	Site Allocation Policy	<p>We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document.</p> <p>We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings.</p> <p>As acknowledged by Lambeth cabinet last November, "Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough." Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document.</p> <p>Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate</p>	<p>One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes'. These strategic overarching principles are also applicable to the SADPD PSV.</p> <p>The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy SI1. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.</p> <p>The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth's Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council's work.</p>

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			matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.	
Mums for Lungs	R0501	Transport	<p>Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough.</p> <p>We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?</p>	Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.
Mums for Lungs	R0501	Transport	<p>In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.</p> <p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It's equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p> <p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth council so that they become a tangible, positive reality for everyone living and working in the borough.</p>	In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking. Other London Plan policies will be applicable, such as Policy T1 'Strategic approach to transport', T2 'Healthy streets' and T5 'Cycling', that set the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.
WSP on behalf of GSTT	R0806	Other	<p>Further to our recent meeting with you, we write on behalf of our client, Guy's and St Thomas' Hospital NHS Foundation Trust (GSTT or the Trust herein) in response to the Regulation 18 consultation on the Draft Site Allocations DPD produced by the London Borough of Lambeth (the Council herein). The Trust is an important landowner, healthcare operator, research and learning institution and major employer in the Borough and are commenting on the document in their role as the landowner of 'Proposed Site 2' in the DPD document.</p> <p>The Trust welcomes the inclusion of St Thomas' Hospital as a site allocation and in particular the recognition of the site's potential to contribute to the MedTech cluster, as established by the vision for Waterloo and South Bank in the Lambeth Local Plan (2021) (Policy PN1). The role of the site in its potential to deliver enhanced clinical care, ancillary uses to the Hospital such as workspace, and flexibility for</p>	Support for site allocation noted.

			<p>relocation of Florence Nightingale Museum, are all supported by the Trust and align with future aspirations for the site.</p> <p>The Trust are currently undergoing a visioning exercise, led by SOM, across all of their sites to understand how best to locate and design their services, to continue providing quality care and accessibility to it's communities. This is still at an early stage and therefore plans for the expansion and additional ancillary uses at St Thomas' Hospital are not yet known or finalised. This exercise will be taking place over the next year, so in parallel with the Draft Site Allocations DPD.</p>	
WSP on behalf of GSTT	R0806	Other	<p>We note that the site allocation for St Thomas' Hospital, referred to as Proposed Site 2, has been based on an indicative scheme which is set out in the Council's evidence paper. It should be recognised that this scheme has not been submitted by the Trust nor is it a representation of the extent of future opportunities on the St Thomas' campus. It is appreciated that this is purely indicative and based on the Council's understand of anticipated needs, so is meant as a supporting guide, and not a prescriptive option of what development could look like. However, it has clearly directly fed into key elements of the allocation such as the allocation boundary and approach to tall buildings. These are definitive factors that would be significant considerations for any future planning application on the site once adopted. We do acknowledge your comment at our meeting that a planning application can subsequently set out other material considerations/evidence, however we are concerned that an unduly restrictive allocation could undermine the future potential of the site. The Trust therefore cannot support these elements of the site allocation at present and holds concern that the proposed approach may limit the potential future development opportunities being considered. We consider each of these in further detail below.</p>	<p>The site boundary has been amended at the western edge.</p> <p>Tall building locations have been informed by design considerations in accordance with London Plan Policy D9, and in particular the need to protect the setting of the Westminster World Heritage Site, which will apply equally to any planning application.</p>
WSP on behalf of GSTT	R0806	Other	<p>Boundary of Proposed Site 2</p> <p>We propose that the boundary for the allocation is extended to encompass the whole of the St Thomas' Hospital site. There is by no means an intention to redevelop the entirety of the site, noting the presence of listed structures on the site particularly, however drawing the allocation boundary in this way allows for the site to be considered as a working whole, as it is in practice. There are aspects of development that would significantly benefit from such as approach, for example the consideration of access, public realm and uses. There are also other development opportunities outside of the boundary presented, such as at Block 9, where planning permission has previously been held for sensitive enhancement. Ultimately, the extension of the boundary would allow for maximum flexibility for individual development parcels within the campus to be brought forward and therefore support the future operation of the Hospital as a whole. The site allocation could include further details on certain areas of the</p>	<p>The site boundary has been amended at the western edge. Proposals for other parts of the wider hospital campus could still come forward and would not be prejudiced by the site allocation.</p>

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			site within this wider boundary if required. As discussed at our meeting, we would be happy to discuss the details of such an approach with the Council moving forward.	
WSP on behalf of GSTT	R0806	Other	<p>Tall Buildings</p> <p>We recognise the heritage context of the St Thomas' Hospital campus, with listed buildings both within and in close proximity to the site, not least the Westminster World Heritage Site opposite. The campus' location in the townscape and in key local and strategic views is clearly a significant consideration for any future development. The Hospital should continue to be a positive addition to the townscape and respond to its rich historical context. There are large areas of the site which sit outside, or in the general background, to these key views and are less sensitively located with regards to listed buildings. The area around Gassiot House, for example, could support tall buildings its context with the Park Plaza hotel and the emerging Royal Street scheme. The Draft Site Allocations DPD, in not identifying the site as a suitable location for tall buildings, undermines the potential for tall buildings that are of high quality design and responsive to their context to come forward. Tall buildings are likely to be required to support the level of opportunity and enhancement that can be achieved on the campus, however it is noted that these can only come forward following further technical analysis. We therefore request that the potential for height on the site is reviewed with an eye to its existing and emerging context, to positively plan for the additional development that could be supported at the campus. The Trust is keen to work collaboratively with the Council on this and what evidence may be required to support this process.</p>	The site was discounted as a tall building location at Local Plan stage because of its great heritage sensitivity. The heights in Annex 10 for locations W7 and W8 are further from the World heritage Site. The Council does not consider Gassiot House a suitable location for a tall building not only because of the WWHS but also the impact on the setting of The County Hall.
WSP on behalf of GSTT	R0806	Other	In summary, the Trust seek to engage further on the nature of the site allocation for St Thomas' Hospital. The Trust is wholeheartedly supportive of the inclusion in the Plan and appreciates the vision and work of the Council in preparing the allocation. Further iteration is welcomed that can respond to the preparation of further detail by the Trust on their plans for the site. Notwithstanding this point, clearly, given the ongoing visioning internally at the Trust and the role that the document will play in providing a policy guide to future applications, the site allocation cannot be overly limiting or precise to the nature of potential development. The Trust does therefore request that the expansion of the site allocation and the review of the potential for tall buildings in specific areas of the site are considered as the Draft Site Allocations DPD progresses.	Points addressed above
SoWN	R1312	Site Allocation Policy	<p>SA 2 – St Thomas' Hospital Land Uses</p> <p>We are not aware of the future needs of the hospital but in principle, this is of course supported.</p> <p>Building heights, views and townscape</p> <p>The policy that the massing of the proposed new blocks should respond positively to their context... and to the character of Lambeth Palace</p>	The tall building definition in Lambeth, in accordance with the London Plan and as set out in the Lambeth Local Plan Policy Q26 is 45m in this location. Only buildings 45m or greater considered to be tall buildings. The Indicative Approach has been further refined. The Council's evidence shows that there are no harmful impacts. Legibility and routes into the site are best dictated by the Hospital at application stage when proposals are being integrated into the Hospital's vision for the site at that time.

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			<p>road and Westminster Bridge Road is supported. However, the Indicative Approach, suggesting that this site could all be built up to a height of 44m would represent over-development of the site and have harmful impacts.</p> <p>We also do not believe that the Evidence base should say that 'they are not tall buildings'. Whilst they are not defined by Lambeth as tall buildings, in plain English 44m is indeed very tall.</p> <p>As with the comments on SA1 – Royal Street, it is imperative that gaps should be maintained or created between these large buildings in this area, whether or not they are defined as tall.</p> <p>It is notable that, for all of the views from north of the river and further away, there is no view that illustrates the impact of the proposed massing on Lambeth Palace Road.</p> <p>The pedestrian environment is very hostile in this area, notably around the roundabout and Westminster Bridge Road. Any development on this site should avoid the mistakes made on adjacent sites.</p> <p>Transport, movement and public realm</p> <p>Rather than just maintaining the network of routes through the site, any opportunity should be taken to improve legibility and clarity to routes within and through the site.</p>	
Waterloo Community Development Group	R1318	Other	<p>Site 2: St Thomas' Hospital</p> <p>We have not been informed by STH why they might wish to redevelop part of their site, and are not aware as to why it warrants a SA. Clearly it is a significant site because of its location, with two of London's great listed civic buildings either side and the Westminster WHS across the river, but it is a reasonably simple site with one landowner. A key issue of any redevelopment is the cumulative impact of development of site 2 along with the Royal Street sites, in terms of land use, townscaping and placemaking, and heritage impact. It would be inappropriate to determine these issues across both SAs separately: so why are they not being considered together as one SA? We propose that would give a more robust outcome.</p>	Two separate site allocations are considered necessary so as to be able to respond to the individual needs and characteristics of each site. The cumulative effect of developing both sites has been considered through the revised evidence base.
Waterloo Community Development Group	R1318	Other	We agree with the proposed land uses, including re-providing the Florence Nightingale Museum on this site or Site 1 (but no further away from St Thomas')	Noted. The DPD requires re-provision of the museum on site or at an appropriate alternative location, to allow for flexibility while still maintaining the historical connection with the hospital use.
Waterloo Community Development Group	R1318	vision	Under Heritage assets, in addition to the draft policy, development should complement, preserve and enhance the listed County Hall, St Thomas' Hospital and Lambeth Palace and Gardens, and Archbishops Park.	Accepted. Text regarding Lambeth Palace Conservation Area added. County Hall is already mentioned in the text, while St Thomas' Hospital is within the site allocation so impacts will be considered as part of any development proposal.
Waterloo Community Development Group	R1318	Evidence	While the site is not within a location identified for tall buildings, uniquely in Lambeth this refers to buildings up to 45m high, which would be a tall building anywhere else in London, particularly given its proximity to the river. Gassiot House is 32m. It's replacement with Block A in the model evidences the fact that a building substantially higher and closer to 45m would be a significant intrusion in views out of the WHS. TVIA image 5	The massing of the Indicative approach on Gassiot House has been reduced. Please see the revised evidence.

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			and TVIA image 8 show that the gap between buildings on the Lambeth side (between Park Plaza and the Urbanest building, for example) which is currently visible would be walled up by this proposed massing, contrary to the LVMF guidance. This apparent wall of development is even worse in TVIA image 6, as one crosses the river. The massing should be broken up and much lower, akin to the current Gassiot House of 32m. The view in TVIA image 7 suggests that something this high would conflict with the listed County Hall. The taller Park Plaza has been carefully designed so that it looks subservient and slightly lower than the parapet at County Hall; this effect would be completely undermined by the proposed massing of Block A.	
Waterloo Community Development Group	R1318	Evidence	The proposed height and massing of Block B is equally detrimental to Archbishops Park and Lambeth Palace Conservation Area by again presenting a wall of development at least 3 times the height of existing buildings.	Not accepted. It needs to be remembered that the Indicative Approach is a basic envelope study and should not be considered as a proposal. Policy Q7 of the Local Plan seeks to avoid canyon-like frontages and this will have to be considered by applicants at design stage. The bold colours are for identification in views assessments. At application stage the articulation of building facades, the use of suitable materials will ensure that the effect is not oppressive.
Waterloo Community Development Group	R1318	Evidence	Together with that proposed in terms of height and massing for Site 1, there is no sensitivity as to the impact on Lambeth Palace Rd, which will become a deeply unpleasant canyon, trapping pollution and reducing air quality as well as rendering the road insufferable to pedestrians.	Not accepted. At Gassiot House the trees and open space occupying a significant part of the Hospital's Lambeth Palace Road frontage are identified for retention so a continuous built frontage along the entire length is not envisioned. Furthermore, the footways are already generous at 5-6m wide and it is proposed to keep any proposed buildings 15m further back from the current back edge of the pavement. The overall building to building width across Lambeth Palace Road will be in the region of 35m.
Waterloo Community Development Group	R1318	Vision	We therefore again strongly object to the proposed quantum of development envisaged for the site, as demonstrated as inappropriate through the indicative modelling.	The indicative approach has been revisited.
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the</p>	Noted.

			<p>consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>

			<p>lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.</p>	
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> • Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO₂e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO₂e output. - 4-5% of the worldwide total of CO₂e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution 	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

			<ul style="list-style-type: none"> ● Steel Steel also has a significant impact on the environment: <ul style="list-style-type: none"> - It is CO2e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement: ● Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit "off-gas" toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. ● Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world's riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber. 	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> ● Overheating, caused by the proliferate use of glass and a high concentration of inhabitants ● Increasing carbon energy required to offset this through mechanical ventilation ● Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) 	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led</p>

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			<ul style="list-style-type: none"> • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise 'skyscraper' buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p> <p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p>
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council's commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces,</p>	<p>Noted. Please refer to officer responses to previous points made as part of this representation.</p>

			<p>'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <p>1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p> <p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p> <p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	
Individual	R1347	Vision	To comply with transport & land planning requirements development vision to be car free with no access to local CPZ for occupiers.	Policy wording is amended to refer to London Plan parking standards (Policy T6). London Plan Policy T6 will apply. The development will be secured as car-free and all occupants (except Blue Badge holders) will be prevented from applying for parking permits. The policy wording will be amended to make the relevant policies clearer.
Individual	R1851	vision	yes - this site is already densely developed and it is ridiculous to remove perfectly good facilities and replace with what will no doubt be termed as 'world class facilities' ... the existing buildings are perfectly	The site allocation allows for development to enhance the facilities on the site. It sets necessary parameters for development but does not require existing buildings to be replaced.

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			<p>capable of being retrofitted and if required, extended to serve any new purpose. This entirely contradicts every policy relating to the environment. Common sense should prevail. The environmental impact of demolition alone would entirely contradict both Lambeth and the Mayor of London's declaration of a climate emergency and all the other policies in place relating to a sustainable London. not only this site but the Royal Street site 2 as well!!!</p>	<p>Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard).</p> <p>All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.</p>
Transport for London	R0312	Other	<p>The site is bordered by Lambeth Palace Road and Westminster Bridge Road which form part of the TLRN. Any changes to access and proposals for transport interventions on the TLRN including a new pedestrian/cycle crossing on Lambeth Palace Road will need to be assessed by, and subject to, TfL agreement. Street trees will need to be protected. There is an opportunity to improve pedestrian and cycle connectivity from Lambeth Palace Road to the riverside and to rationalise existing vehicle crossovers on Lambeth Palace Road. Depending on the scale of development, we may require contributions to buses and the Waterloo Northern line step free access project as part of the transport mitigation package. We would also expect a contribution towards cycle hire capacity and Legible London signage. We would expect a substantial reduction in on site car parking, consistent with the London Plan and NHS/public health targets of increasing the overall health of the public. All these requirements should be summarised in the site allocation to provide clarity and to ensure a consistent approach. The development also provides the opportunity to rationalise servicing off-street. As referenced in the site allocation, the impact of servicing and construction could be minimised through use of shared servicing arrangements and freight consolidation. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development.</p>	<p>Proposals for pedestrian crossings on Lambeth Palace Road have been revised. The developer contributions sought will depend on the scale and form of development proposed, which is not specified in the policy. As a result the policy wording has been revised to ensure that the relevant policy considerations are highlighted, rather than to include specific mitigation measures that may or may not be required in practice.</p>
Historic England	R0654	Other	<p>We would like to discuss sites 1 and 2 with our London Advisory Committee and we may have additional comments to make which I hope we can provide before the next version of the plan is finalised. We appreciate that these can only be informal comments in the absence of a consultation.</p>	<p>Noted</p>

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Historic England	R0654	Other	We advise that a Heritage Impact Assessment (HIA) that reflects the ICOMOS HIA Guidance is submitted in support of the St Thomas's Hospital site and Royal Street site allocations. We have concerns that the cumulative impacts of these developments, alongside others that have been approved, will result in harm to the Westminster World Heritage Site (WWHS). The Operational Guidelines for the Implementation of the World Heritage Convention (2019) stress the importance of Heritage Impact assessment, noting at paragraph 118 that these should "be a pre-requisite for development projects and activities that are planned for implementation within or around a World Heritage property".	Heritage Impact Assessments have been included in the evidence. This includes an assessment of the cumulative impact.
Historic England	R0654	Other	A master planning exercise for all sites across the hospital campus might be a helpful way of understanding how development could be distributed across the area rather than focusing on a building by building approach. This might help deliver similar amounts of development with lesser impacts.	The hospital does not currently have a masterplan and the two sites are in separate ownership. The site allocation focuses on the most sensitive part of the campus that would most benefit from a planned approach to development.
Historic England	R0654	Other	We have concerns as to the indicative heights set out for the site. The definition of a tall building within this part of Lambeth is 45m, the indicative heights for the site have been modelled at 44m and the SADPD indicates that this height will be acceptable. This stretches the limits of what can be done without being defined as a tall building, and in our view a difference of 1m does not meaningfully mitigate the impacts of having a tall building on the site. More guidance should be included to guide scale and height parameters. Parts of Block B might be almost entirely screened by existing development and these heights might be feasible in most instances, however, this is not the case for all parts of Block B or Part A	The indicative approach to heights and massing have been revisited and that to Gassiot House has been reduced. Please see the revised evidence.
Mayor of London	R0852	Other	We welcome the acknowledgement of the need to preserve or enhance the setting and Outstanding Universal Value of the Westminster World Heritage Site. To be consistent with Policy HC2 of the LP2021 the allocation should consider whether development proposals would need to be supported by Heritage Impact Assessments.	Accepted. This has been added to the policy. Requirement for a Heritage Impact Assessment added to the policy wording for this site allocation.
Environment Agency	R0886	Other	Current flood zone designation: 3 (in tidal breach modelling) Rivers on / adjacent to site / flood defences: No Permitted waste site within 250 metres: No Groundwater Source Protection Zone: No Comments to add into site allocation text: Protect groundwater from contamination sources. Contamination from Hospital use It is important that allocated sites such as 2 and 9 are mindful of the need to have defences raised within the period of 2035 - 2049.	The site is adjacent to a tidal flood defence and the site allocation policy makes reference to this and what is required of developments to protect integrity of the defences. With regards to contamination - comments are accepted and will be included in the policy wording for this site allocation.

Officer Response to Reg 18 Representations: Site 3 – 35-37 and Car Park Leigham Court Road SW16

Officer Response to Reg 18 Representations: Site 3 – 35-37 and Car Park Leigham Court Road SW16

Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R0042	Other	<p>I am writing in response to the proposed redevelopment of this site, as I am a local resident who is concerned about the proposal to build on the site.</p> <p>I am not personally a car driver, but I recognise that at present there is still a need for local residents to be able to park to access shops in the Streatham Hill area. Many of my neighbours are older residents and I know they rely on being able to park locally. This car park is a useful local asset which has been out of use for a long period of time, and I know other residents have been concerned about the loss of a public amenity.</p> <p>I do not see that there is any justification to remove this asset which residents have campaigned to keep open and which it has been made clear on numerous occasions is a useful amenity appreciated by many residents.</p>	The site has a Public Transport Accessibility Level of 6a which is considered excellent. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals.
Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make.</p>	Noted.
Individual	R0112	Other	<p>I right to said about the importance of the car park in leigham court rd.</p> <p>The car park is very important to us</p> <p>We use the park for shopping for a gp appointment.</p>	The site has a Public Transport Accessibility Level of 6a which is considered excellent. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals.
Natural England	R0163	General	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	Noted.

Officer Response to Reg 18 Representations: Site 3 – 35-37 and Car Park Leigham Court Road SW16

Respondent	ID	Draft SADPD Section	Comment	Officer response
Natwest Streatham Branch	R0175	Other	<p>I am writing to strongly object to the permanent closure of the Leigham Court Road car park.</p> <p>For years the staff of NatWest Bank, 54 Streatham High Road have parked their cars on surrounding roads such as Broadlands Avenue, De Montfort Road, Mount Ephraim Road and Norfolk House Road Over the last couple of months these roads have become permit holders only bays and we have not been able to park our cars there. All of the houses along these roads have off street parking and now the roads have very few cars parked on them and hundreds of empty bays that could be used by workers.</p> <p>I am therefor flabbergasted to hear of the plans to close the only local car park permanently. There are hundreds of people working in the shops and businesses along the High Road who will have no where to park. Many of our staff drop and collect children off at school/ childcare in the mornings and afternoons and just 'getting a train' to work instead is not an option.</p> <p>All the Staff at NatWest bank strongly object to the proposed closure of the car park.</p> <p>I also anticipate an exodus of small local business from the area if the car park closes as who would want to run a business where their staff and customers cannot park!</p> <p>I urge Lambeth Borough Council to either not close the car park, to cancel the permits holders only bays on surrounding streets with immediate effect or to issue each business on the High Road with car parking permits to park on the local streets.</p> <p>I look forward to receiving your response to our objections.</p>	<p>The site has a Public Transport Accessibility Level of 6a which is considered excellent. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals.</p> <p>Alternative locations for parking for those who need to use a car can be found in close proximity to the existing car park, including Blue Badge space on Leigham Court Road, or pay by phone on nearby borough roads.</p>
Transport for London Spatial Planning	R0312	Other	<p>The site is close to Streatham Hill and Streatham High Road which forms part of the TLRN. At the southern end of Streatham Hill, TfL is developing a Healthy Streets scheme aimed at reducing speeds, providing cycle facilities, and improving conditions for pedestrians. A contribution towards these Healthy Streets improvements may be appropriate as part of the transport mitigation package. We welcome confirmation that Local Plan and London Plan parking standards will apply. All existing car parking on the site should be removed consistent with London Plan Policy T6L which states that: 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy'. Due to the PTAL, this would require a car free development.</p>	<p>Noted. Policy wording amended to reflect suggested additions.</p>
Individual	R0383	Other	<p>Please accept notification that I object to the planned closure of the Streatham Hill car park.</p> <p>While many businesses in the high road are still recovering from the</p>	<p>There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good</p>

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			effects of the pandemic, driving potential patrons away as there is nowhere to park adds insult to injury.	bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R0451	Other	I would like to oppose the planned closure of the car park on Leigham Court Road. It is the only one in Streatham. It has not been closed for several years and has only just reopened. It is needed for those who want to access local shops, bring in much needed trade to the area after the pandemic.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R0477	Other	I understand that the Council plans to close permanently Streatham's only public car park at the Streatham Hill end of Leigham Court Road: without providing any replacement parking facility. I OBJECT to any such proposal, which appears to be detrimental to attainment of the Council's averred objectives for the Streatham and Streatham Hill neighbourhoods as set out at p. 295 (Section 11) of the Lambeth Local Plan 2020 – 2035: Section 11 p.295 Streatham's role as a major town centre in South London will be supported and enhanced to create a vibrant and viable town centre with a diverse economy including retail, leisure, offices, hotels and housing. Investment in public realm, green infrastructure and public transport will ensure it is an attractive place to live, work and visit,,,safeguarding retail uses in the two primary shopping areas (Streatham Hill and Streatham Central) and supporting appropriate new retail uses	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Mums for Lungs	R0501	Site Allocation Policy	We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document. We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings. As acknowledged by Lambeth cabinet last November, "Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough." Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document. Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.	One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes'. These strategic overarching principles are also applicable to the SADPD PSV. The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy S11. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation. The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth's Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council's work.

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Mums for Lungs	R0501	Transport	<p>Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough.</p> <p>We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?</p>	Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.
Mums for Lungs	R0501	Transport	<p>In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.</p> <p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It's equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p> <p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth council so that they become a tangible, positive reality for everyone living and working in the borough.</p>	<p>In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking.</p> <p>Other London Plan policies will be applicable, such as Policy T1 'Strategic approach to transport', T2 'Healthy streets' and T5 'Cycling', that set the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.</p>
Individual	R0615	Other	<p>I, the undersigned, object to Lambeth Council's proposal to close Streatham's only public car park in Leigham Court Road.</p> <p>I, support local business and the local Lib Dems in calling for investment in the site including improving the parking provision with electric charging points and opening new public toilets.</p>	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
InStreatham BID	R0627	Other	<p>InStreatham provides a strong collective voice for 500 businesses in Streatham and supports projects that invest in the development and promotion of the BID area and its businesses. InStreatham is a placemaking organisation which focuses on holistically managing and improving our Town Centre for the benefit of those who live, work and visit. The site at 35-37 and Car Park Leigham Court Road provides a</p>	<p>There is no Development Plan policy that seeks to retain car parks. Rather, London Plan Policy T6L states that: 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy'.</p> <p>Local Plan policy T6 on parking states that the council will apply London Plan policy T6 to promote a reduction in car ownership and private car trips. Due to the PTAL rating of 6a at this site, car free development is required.</p>

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			<p>great opportunity for redevelopment in the area that can create both commercial floor space and investment opportunity.</p> <p>Streatham businesses however are incredibly concerned about the loss of crucial shopper parking in this area proposed in the scheme with no alternative provision cited elsewhere in the district. This is the only publicly owned car park in Streatham and the only shopper parking facility in the north of Streatham Town Centre boundary. The site has been poorly maintained and badly lit for a number of years leading to a decline in its usage. However it still provides valuable consumer parking in an area that is densely populated and on a TfL Red Route.</p> <p>Whilst Streatham Businesses are mindful of their carbon footprint and are utilising a number of BID services to mitigate their environmental impact we understand that there will always be products and services that require private vehicle transportation of goods and certain consumer demographics that require car parking.</p> <p>We have introduced a number of sustainable initiatives to help businesses such as the electric cargo bike, subsidised mixed recycling, plastic free streatham, canvas tote bags and collective procurement of green energy. However Town Centre management is holistic and there needs to be adequate facilities for all users of our High Street.</p> <p>Behaviours won't suddenly change however the car users in the area that can no longer find parking will move their custom to other Town Centres which still offer parking such as Pope's Road Car Park in Brixton or the Sainsbury's Car Park in Balham.</p> <p>Previous planning incarnations of the site have seen its potential for commercial redevelopment uses, such as a hotel, that retains the Shopper parking on the ground floor of the site. This parking would therefore be more adequately maintained and whilst parking charges would inevitably be higher its usage would increase if well maintained, with barrier access and suitable lighting.</p> <p>InStreatham would be keen to understand the potential for including car parking on the ground floor of this redevelopment with office space above and housing at the rear if the Hotel option is not considered viable. If no parking can be considered suitable for this development can the council assure In Streatham that investment will be made in alternative solutions that support businesses particularly in the immediate vicinity?</p> <p>InStreatham would be keen to see the exploration of the site that retains some shopper parking whilst also becoming a hub for last mile</p>	<p>The Council is looking at introducing Controlled Park Zone in the Streatham Wells ward which would help provide on-street parking near the town centre.</p> <p>The part of the site fronting Leigham Court Road is within the town centre boundary and town centre uses (e.g. retail, office or hotel) are supported in this area. The remaining part of the site (to the rear) is outside the town centre boundary and therefore such town centre uses are not supported in that part of the site. The proposed policy therefore allows for the provision of a hotel or office development to come forward at the front part of the site.</p> <p>There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.</p>

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			deliveries that service the north of the Borough and a hub for electric vehicle charging. We have been keen to activate this underutilised site for many years even considering it prime for a Sunday market or PoP Brixton style pop-up entertainment and leisure usages while the long term use is still being considered.	
InStreatham BID	R0627	Other	We have been keen to activate this underutilised site for many years even considering it prime for a Sunday market or PoP Brixton style pop-up entertainment and leisure usages while the long term use is still being considered.	Noted. The Council will explore short term solutions for the site until redevelopment is delivered
Individual	R0676	Other	<p>We understand that you are proposing to redevelop Leigham Court Road car park. We object as the closure of this car park would mean that there is no provision for visitors or those who live further afield in Streatham to park to support local businesses or visit the Medical centre opposite.</p> <p>With more LTZs and restricted parking on the side roads the closure of this car park would mean cars would park on Leigham Court Road creating an even narrower road for public transport, emergency services, public service vehicles, deliveries and private vehicles, as well as cyclists, motor bikes etc.. In addition it would increase pollution for those living along the road and pedestrians.</p> <p>Instead of closing the car park, why not make it more user friendly? Electric charging points, better lighting, security, and developing and opening the public toilets. Streatham has a lot of residents, a lot of flats, there is the need to improve the infrastructure first before more housing is built. Public transport is being paired back, reducing access for those travelling into London.</p> <p>The acquisition of the car park at the back of 43 Leigham Court Road, (LeighamCourt Road ODDR.pdf), point 5.2 says that: '...in the longer term this site should fall under the remit of Housing regeneration as potential future uses for the site include temporary accommodation, affordable housing or a mixed use scheme.'</p> <p>It appears that the intention was always to close the car park. The only true 'affordable' homes are those that are well built, well maintained, have a low rent and are not sold on at a healthy profit making the property unaffordable for the next person.</p> <p>Do not make Streatham even more inaccessible for visitors and local businesses, especially at a time when the economy needs to recover.</p>	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.

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Individual	R0686	Vision	<p>I live in Streatham and was disappointed to hear about the imminent planned closure of the Leigham Court Road car park. This is the only useful parking in the local area and I was delighted to hear that it had reopened recently but then very annoyed to hear that it was likely to be temporary. I, like many others, am forced to drive to the shops in Streatham Hill and this helps make it convenient to support local businesses. It is so much more easier these days to get items delivered to your house and we don't need any more reasons to ignore our local businesses!</p> <p>I do hope you will listen to local residents and hold a real consultation with local business owners on this.</p> <p>This is reducing the availability of parking in Streatham Hill / Streatham High Road. More housing in this area, with little provision for parking, will negatively impact local businesses and the ability of those from local areas, who want to travel there and are unable to use public transport, from supporting independent local businesses. This is not a good vision.</p>	Alternative locations for parking for those who need to use a car can be found in close proximity to the existing car park, including Blue Badge space on Leigham Court Road, or pay by phone on nearby borough roads.
Individual	R0818	Other	I would like to object to the development of the liegham court road car park. If it is closed my mother would have to find a new GP. She is 94 and severely disabled. This car park allows her access the practice opposite as traveling by adapted car is the only mode of transportation she can tolerate.	Alternative locations for parking for those who need to use a car can be found in close proximity to the existing car park, including Blue Badge space on Leigham Court Road, or pay by phone on nearby borough roads.
Environment Agency	R0886	Other	<p>Current flood zone designation: 1</p> <p>Rivers on / adjacent to site / flood defences: No</p> <p>Permitted waste site within 250 metres: No</p> <p>Groundwater Source Protection Zone: SPZ2</p> <p>Comments to add into site allocation text: Protect groundwater from contamination sources. Contamination from car park.</p> <p>Site is within Source Protection Zone 2 area for the public groundwater supply borehole in Brixton, operated by Thames Water.</p>	Accepted: Add 'Potential contamination from carpark' to Context table Add to site allocation policy flood risk section as new second sentence the following: 'Protect groundwater from contamination sources. Contamination from car park'.
Individual	R0899	Other	I object to the change to the Carpark on Leigham Court Rd	Noted.
Individual	R0923	Other	<p>I only support this development if it linked with the redevelopment of the bowling green site and the disused synagogue.</p> <p>The site would be ideal for a covered market and other public active space such as a children's play park or skate park.</p> <p>Otherwise it is short sighted and results in loss of local amenities.</p> <p>I am a local resident and demand that these sites are removed from the plan and new plans are developed in partnership with the community.</p>	<p>The site allocation policy strongly encourages applicants to explore the possibility for comprehensive redevelopment with adjacent sites. However, given different landownership and stages of redevelopment of those sites it is considered more appropriate to focus on the redevelopment of the Council owned site.</p> <p>Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the</p>

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				ten year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use.
Individual	R0992	Other	<p>Although I have every hope Streatham & indeed all of London will have significantly reduced car usage in the coming years, I do not feel taking away Leigham Court Road car park at this moment in time is the right thing to do.</p> <p>We need to aid/help people to readjust to their habits however right now far too many residents including the elderly & vulnerable still rely on this public car park space as do local businesses for trade.</p> <p>Therefore I feel you should seriously reconsider your current proposals.</p>	Alternative locations for parking for those who need to use a car can be found in close proximity to the existing car park, including Blue Badge space on Leigham Court Road, or pay by phone on nearby borough roads.
Individual	R1030	Other	<p>I am writing to register my concern about the plans from Lambeth Council to Close Leigham Court Road Car Park. This is Streatham's only public car park and it's loss is likely to be keenly felt by traders who in the past have used it for their own parking as well for customers. It will likely increase parking pressure in residential roads. A friend at South Lodge has already said how often their parking spaces are used by non-residents.</p> <p>At a time when our high street businesses are facing intense competition from online retailers we should realise we need to support our town centre with appropriate public parking. Rather than closing the car park the council should regenerate them and add much needed electric charging points.</p>	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1063	Other	<p>I am a local resident and have lived in Streatham Hill since 1984. I object to the redevelopment plans for the Leigham Court Road car park. I suggest that parking spaces need to be preserved to support local businesses and disabled residents.</p> <p>I also suggest that the public toilets urgently require a replacement toilet facility to encourage walking to shops and services in the Streatham Hill area. Please consider installing at the very least an automated toilet facility. If you are unwilling/unable to do that then please sponsor local cafes to provide publicly available toilets, similar to initiatives done in the past.</p>	<p>Toilets have been closed since at least 2011. There is no policy requirement to reprovide disused public toilets. To find your nearest public toilet see the Great British Toilet Map. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.</p> <p>Alternative locations for parking for those who need to use a car can be found in close proximity to the existing car park, including Blue Badge space on Leigham Court Road, or pay by phone on nearby borough roads.</p>
Individual	R1258	Other	<p>I am writing to register my objection to the proposal to develop the site currently occupied by the Council car park in Leigham Court Road. Whilst I fully believe that we need to encourage the use of public transport and reduce car usage, the fact is that a number of people</p>	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good

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			using the shops on Streatham Hill and Streatham High Road travel here by car. Streatham has very few public parking spaces. It is essential that we retain these if we are serious about rejuvenating the High Road and reducing the number of vacant retail units.	bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1286	Other	<p>I wish to object to the proposal to eliminate the only public car park in Streatham.</p> <p>It is incredible that instead of providing parking facilities in one of the borough's two major town centres Lambeth Council is actually proposing to severely reduce parking capacity and to do away with the area's sole public car park, and the only car park in the Streatham Hill area.</p> <p>There is no evidence in the proposal that parking capacity, requirements or impacts have even been considered.</p> <p>I am also the Secretary of the Friends of Streatham Hill Theatre. The Council and the GLA support the scheme to bring the theatre back into use as a key driver for local regeneration. Like many local businesses in the area which would be adversely affected its development will be damaged by the removal of local car parking capacity.</p> <p>I am a member of the Transport Group of Streatham Action and I do not support the Council's proposal. A car park is essential to the viability and vitality of the town centre.</p> <p>It is noted that the proposal makes much of the potential for comprehensive redevelopment of the site together with adjacent sites. This is at the same time as planning officers have recommended an application to develop one of these neighbouring sites on Leigham Court Road – approved by planning committee tonight (Tuesday Feb 22). Ref: 21/03028/FUL.</p> <p>It is clear that this proposal has not been properly thought through and its implications have not been appropriately assessed. It does not recognise the needs of the Streatham area.</p>	The site allocation policy strongly encourages applicants to explore the possibility for comprehensive redevelopment with adjacent sites. However, given different landownership and stages of redevelopment of those sites it is considered more appropriate to focus on the redevelopment of the Council owned site. The site has a Public Transport Accessibility Level of 6a which is considered excellent. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals.
Streatham Action	R1308	Other	i) Streatham Action (SA) is concerned about any redevelopment of an area that removes Streatham's only central car park for shoppers, which makes no alternative provision for car parking in central Streatham and particularly at a time when parking provision has been reduced yet further on the back of controlled parking extended now to St Leonard's North and beyond the original focus on Streatham Hill East;	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Streatham Action	R1308	Other	ii) On the back of the recent closure of the synagogue behind, and to the side of, South Lodge SA believes that a hold should now be placed on any final decision on redevelopment of the shoppers' car parking site until such time as a bigger picture perspective on redevelopment of a	The site allocation policy strongly encourages applicants to explore the possibility for comprehensive redevelopment with adjacent sites. However, given different landownership and stages of redevelopment of those sites it is considered more appropriate to focus on the redevelopment of the

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			<p>possible wider area of that bottom end of LCR has been assessed by Lambeth's planning officers;</p> <p>iii) SA would want to see provision made in any such redevelopment plans also to incorporate a Streetcare Team presence. For instance, a holding area for Streatham's Streetcare push carts is currently located behind the disused public toilets. SA is keen to ensure that provision is made for housing these pushcarts, so as to continue to provide a good cleanliness on the pavements in central Streatham.</p> <p>iv) On the basis that the time horizon for construction of any such redevelopment project for the Shoppers' car park area is apparently some way off, SA is strongly of the opinion that "holding fire" on this approval process would be advantageous for the long term, so as to allow Lambeth's planning officers to consider any more ambitious proposals for a possible enlarged area to encompass also the disused synagogue area – if potentially available – that may thereby also be able to incorporate car parking provision.</p>	<p>Council owned site.</p> <p>Accommodation of the street cleaning equipment behind the disused toilets is a temporary arrangement. New arrangements for the Streetcare Team are currently under discussion.</p>
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas</p>	Noted.

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			<p>such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>

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			would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.	
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> ● Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO₂e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO₂e output. - 4-5% of the worldwide total of CO₂e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution ● Steel Steel also has a significant impact on the environment: - It is CO₂e intensive 	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			<p>- It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement:</p> <ul style="list-style-type: none"> ● Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit "off-gas" toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. ● Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world's riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber. 	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> ● Overheating, caused by the proliferate use of glass and a high concentration of inhabitants ● Increasing carbon energy required to offset this through mechanical ventilation 	Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.

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			<ul style="list-style-type: none"> • Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise ‘skyscraper’ buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p> <p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p>
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council's commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of</p>	<p>Noted. Please refer to officer responses to previous points made as part of this representation.</p>

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			<p>which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <p>1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p> <p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p> <p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment,</p>	

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			and our ecology over the coming decades. These proposals do not do that.	
Individual	R1323	Other	<p>I am writing to express my total opposition to Lambeth's development plans to permanently close the public car park in Leigham Court Road, SW16, and to sell the site to developers to build on.</p> <p>The car park must stay open to support local shops, businesses and services in Streatham Hill, Leigham Court Road, and the Streatham Hill end of Streatham High Road.</p> <p>It is disgraceful that Lambeth Council is trying to deliver this blow to the Streatham shopping centre.</p> <p>This is Streatham's ONLY public car park.</p> <p>Lambeth has already done its best to undermine local businesses by keeping the car park closed for no reason, having cleared the site of flytipping 4 months ago.</p> <p>It's now clear that Lambeth did this deliberately to prevent the car park being used by customers of local businesses, in order to make it easier to close the car park permanently. It's an absolute disgrace.</p> <p>KEEP THE CAR PARK OPEN, and reject plans to redevelop the site.</p>	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R0644	Vision	The area is built up enough already.	Noted
Individual	R0644	Vision	People coming to the area need parking facilities to shop. Reducing these will deter people from visiting the area & go to where they can park. Local businesses will suffer.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1347	Sustainability Appraisal	Dedicated space for deliveries & servicing the site to be allocated from adjoining roads to reduce local car storage. Access to car storage encourages car use.	Servicing and access route is proposed within the site, as shown on the Vision Plan.
Individual	R1374	Vision	The car park has been a longstanding and useful local amenity. There is no other car park in the area. This can't be good for local shops..	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1374	Evidence	The evidence states that the car park has been closed for several years. This is not true at all.	Noted. Para 2.3 of the Design Evidence Base will be amended to reflect that the car park has been closed at several intervals during 2021 and 2022 due to incidents of fly-tipping and antisocial behaviour. The car park has recently been reopened following the installation of a new entrance barrier.
Individual	R1376	Site Allocation Policy	The site should re-provide the existing toilet facilities.	Toilets have been closed since at least 2011. There is no policy requirement to reprovide disused public toilets. To find your nearest public toilet see the Great British Toilet Map.

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Individual	R1383	Vision Map	This format of consultation is very unwieldy. This visualisation of what the site will look like is very unclear about what it will consist of and what demand these buildings will put on local services. It is unfortunate that proper consultations have been replaced by Commonplace sites. How can we find out what the site will look like and what demand on user services and answers to other residential development-appropriate questions? Without this information in one place, this consultation will produce worse decision -making than before.	Feedback regarding the Commonplace consultation is noted. The policies set out in the draft SADPD are not development proposals. The site allocation policies set out the land uses the Council would like to see come forward on this sites and provides only some indicative ideas on potential design, massing and unit numbers.
Individual	R1389	Vision	We need car parking for people who can't use bikes and public transport to carry their shopping. A lack of parking is killing Streatham's High Street.	Alternative locations for parking for those who need to use a car can be found in close proximity to the existing car park, including Blue Badge space on Leigham Court Road, or pay by phone on nearby borough roads.
Individual	R1391	Vision	The long derelict public toilets in Leigham Court Road are an eyesore that need action but large scale development including a significant amount of new housing at the expense of Streatham's only public car park is not the answer.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1391	Site Allocation Policy	The redevelopment should be restricted to the area of the derelict former public toilets ONLY. The car park is Streatham's only public car park and, when open, is used well and regularly by people using the shops in Streatham Hill and the Streatham Hill end of Streatham High Road. This car park MUST stay and must be opened and closed properly every day with appropriate security so that it is not subject again to the recent illegal flytipping by unwelcome "travellers". They have permanent sites and should be properly prevented from illegally accessing sites like this car park. Please back local shops, services and businesses who say Streatham depends on adequate car parking provision for shoppers and traders. It is not correct for you to say that the car park has been closed for several years. It has only been a few months and then only because of illegal flytipping due to Lambeth Council being too lazy to open and close the car park properly.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1391	Vision Map	Only the frontage should have any development to replace the existing eyesore of derelict former public toilets.	Noted. The site allocation policy seeks to redevelop the disused toilets and bring an active ground floor use to this part of the site. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic. Accordingly the rear of the site should also be redeveloped to a more efficient landuse.
Individual	R1391	Context	I am astounded by the sheer ignorance of and lack of research undertaken by the author of this so-called analysis of the context of the site. 45 Leigham Court Road is not - repeat, NOT - never has been and never could be a "nursing home". It is low level sheltered housing, i.e.	Accepted. Noted. References to 45 Leigham Court Road being a nursing home will be corrected to 'retirement housing'

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			the housing association that owns the building, which has 26 flats, expects us to live independently. There is a housing officer who works office hours only, no other staff, no nurses and no carers. If you are going to publish documents like this you really need to get your facts right!	
Individual	R1391	Context	The other point I wish to make here is that it seems likely that Leigham Court Road will shortly be the dividing line between two LTN's. Low Traffic Neighbourhoods are unnecessary and unhelpful and actually only have the opposite impact to what is intended of them, i.e. they cause much additional pollution particularly on the roads around their edges and just frustrate everyone including the majority of residents within LTN's. Additional housing in place of Streatham's only public car park, which serves its businesses and its economy, will only cause further traffic congestion on Leigham Court Road and thereby increase pollution, driver frustration, road rage and adversely impact on road safety.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1391	Context Map	None that I haven't already made.	Noted.
Individual	R1391	Evidence	As I have already said, any development should replace the derelict public toilets but not the car park which is Streatham's only public car park supporting businesses and traders at this end of what is one of the longest high roads in Europe.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1391	Evidence	The derelict public toilets are shown in the photo in the middle of page 1 and bottom of page 6. They are an eyesore that must be replaced but not at the expense of the car park.	Noted. The site allocation policy seeks to redevelop the disused toilets and bring an active ground floor use to this part of the site. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic. Accordingly the rear of the site should also be redeveloped to a more efficient landuse.
Individual	R1391	Evidence	The map on page 5 shows 43 Leigham Court Road as a club. The club closed many years ago and was converted back to housing. Paragraph 2.3 wrongly states that the car park has been closed for several years. In fact it is not closed now. It should be brought back into appropriate use with good security to prevent repeats of causes of recent temporary closures. Paragraph 2.4 wrongly states that the synagogue is to the rear of 43 Leigham Court Road. It is actually to the rear of 45 Leigham Court Road but is adjacent to what is the far end of the car park from its entrance.	Noted. The reference to a club is shown on a historic map of Leigham Court Road. This is included to show how the area around the site has developed and does not represent the current context of the site. Para 2.3 of the Design Evidence Base will be amended to reflect that the car park has been closed at several intervals during 2021 and 2022 due to incidents of fly-tipping and antisocial behaviour. The car park has recently been reopened following the installation of a barrier. The text relating to the toilets will be updated to say these have been closed for at least ten years. Para 2.4 will be amended to change reference to 43 Leigham Court Road to 45 Leigham Court Road.

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Individual	R1391	Evidence	In conclusion, the car park MUST remain.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1391	Sustainability Appraisal	The economic effect of building housing on Streatham's only public car park will be negative as it will have a negative effect on the ability of customers of the existing shops, businesses and services to continue to visit them. Streatham has suffered enough from the lack of thought about the area given to it by Councillors and Officers in Lambeth whose attention has wrongly always been focused on Brixton rather than seeking the best for all parts of the borough equally. The derelict toilets are an eyesore long overdue for redevelopment but Streatham's only public car park must stay.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1392	Vision Map	As much as I would like the high street to be car-less, I do think that parking is important for the businesses along the high road	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1406	Vision	It's not clear the mix of affordable housing / new housing. And how many new properties.	Indicative information on housing numbers and the percentage of affordable housing required is provided in the site allocation policy, rather than the Vision for the site.
Individual	R1424	Vision	getting rid of a useful resource for those who wish to shop in Streatham. There is a lack of parking on the high road due to TFL plans and increased CPZ on side roads. - Concern about a large development with no increased resources to support those residents e.g. increased public transport, more doctors surgeries and NHS dentists (none in the Streatham area are currently taking on new patients so where would these residents go?)	As per the site allocation policy, the requirements of Local Plan Policy S2 in relation to new social infrastructure and assessment of anticipated impacts on existing social infrastructure will need to be addressed by any future applicant/developer. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1424	Evidence	2.3 says that the car park has been closed for several years. This is not true. I have used it during covid times.	Noted. Para 2.3 of the Design Evidence Base will be amended to reflect that the car park has been closed at several intervals during 2021 and 2022 due to incidents of fly-tipping and antisocial behaviour. The car park has recently been reopened following the installation of a new entrance barrier.
Individual	R1436	Vision	I think it presents a lack of vision. Straight residential with some commercial. Commercial vacancies already exist due to other pressures & significant flats have been developed under banner of affordable that actually aren't. Wouldn't it be a thought to actually green the space or create a community facility such as bike/ skate park	Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use. Local Plan Policy H2 on affordable housing will apply to the residential units. As the site is in public ownership, the affordable housing threshold at this site is 50% of which the tenure split is required to be 70/30 low-cost rented/intermediate accommodation, in accordance with London Plan Policy H5B.</p> <p>Provision of wide-ranging uses within Class E in the town centre provides flexibility on what may come forward.</p>
Individual	R1439	Vision	<p>I support the redevelopment of this land, to better serve the local community and provide decent quality affordable housing on an underutilised brownfield site. The public toilets have been closed for many years and the car park was already underused and has now been closed permanently for over 6 months. However, the scope of this existing scheme ignores the far greater potential for the wider area which I have previously raised with Lambeth planning officers and councillors several times over the past 4-6 months.</p> <p>As context, myself and many neighbours in the local area have been fighting against planning application ref. 21/03028/FUL which has been submitted by Pocket Living for 49b Leigham Court Road and land to the rear. There are considerable issues with this proposal in its current state, which are well documented in the comments on the application. With the consultation on proposals for Site 3 I am very keen to again raise a wider development scheme proposal for the north end of Leigham Court Road which would improve on the current vision for Site 3 and also remove the majority of impacts of Pocket Living's application. Please see the following link showing the proposal https://www.dropbox.com/s/sjdswwycdov2npu/Leigham%20Court%20Road%20wider%20scheme%20proposal.jpeg?dl=0 The potential scope of this significantly broader and more beneficial scheme is within the red line boundary, the current unacceptable planning application by Pocket Living relating to the land to the rear of 49 LCR is bounded by purple and an additional extension to my proposal is within blue.</p> <p>Since the 2009 Streatham Masterplan, it has been an ambition of Lambeth's to develop the Leigham Court Road Council car park in the top centre of this plan, including potentially adding extra floors above the parade of shops in the top left. This was again re-stated in the 2019 updated Streatham Masterplan. As already mentioned, the existing Council car park is poorly used, has now most recently been closed for over 6 months, and given the Council's aims to incentivise sustainable</p>	<p>Noted. The wording of the policy text relating to site context will be updated to acknowledge the closure of the synagogue and planning permission ref. 21/03028/FUL.</p> <p>The site allocation policy strongly encourages applicants to explore the possibility for comprehensive redevelopment with adjacent sites. However, given different landownership and stages of redevelopment of those sites it is considered more appropriate to focus on the redevelopment of the Council owned site</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>modes over private cars, its loss isn't difficult to justify (though if necessary some provision could no doubt be incorporated into the redevelopment plan).</p> <p>Since these documents were published, the Synagogue building (c.1980s?) which is situated between the Council car park and the land behind 49 Leigham Court Road (subject to current Pocket Living proposal), has unfortunately permanently closed down due to declining membership. It is almost certain that this land will be sold on to a developer, given the development potential of the site, and the existing building makes a neutral contribution to the conservation area so its redevelopment would unlikely be a loss to the streetscape. This site I believe is currently owned by JLiving; a sheltered housing provider who also manage South Lodge at 45 Leigham Court Road.</p> <p>I would suggest that the whole area of land I have highlighted in red on the proposal be developed together properly, tying the three plots of land into one strategic site, with the already existing access off Leigham Court Road, which wouldn't require demolition of the listed building at 49b Leigham Court Road and loss of community space. Half of the land is already owned by Lambeth and the former Synagogue will clearly be available sooner rather than later given it is vacant, so it seems like a smart idea to deploy some joined up thinking and provide a development which contributes meaningfully to the 'regeneration' of the area and gives something back to the community, rather than bringing forward multiple piecemeal schemes which do not have local support.</p> <p>The viability of the larger site would ensure Lambeth could insist on some type of on site community facility provision from the developer(s) as part of the s106 agreement, whether that be sports facilities, a community garden etc, to replace the bowling green to the rear of no.49, which Pocket Living would intend to remove as part of their own proposal (though not necessarily occupying the same parcel of land - this could be provided anywhere across the wider site). An example of where this has happened and benefited Streatham is the Gaumont Place development, which included the Streatham Space Project theatre that has become a local cultural hub.</p> <p>It is not often an opportunity for development of a large strategic site such as this presents itself in a highly urbanised area such as Streatham Hill. There is a genuine opportunity for strategic thinking and properly developing a larger portion of land in a prime location to maximise its potential. From my own experience in development planning, I believe there is the potential for a scheme along these lines to have a similar transformative impact on the neighbourhood as the Gaumont Place development had, and would be far more beneficial to</p>	

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			<p>meeting both Lambeth Council and developers aims, particularly compared to the small, substandard and piecemeal scheme Pocket Living has currently proposed.</p> <p>I summarise the key benefits of the proposal vs the existing Vision for Site 3:</p> <p>Be a financially viable scheme, provide a better incentive and return for developers and allow construction of higher number of new genuinely affordable homes, without serious impacts on neighbouring residents.</p> <p>Provide accessible space for the community to use as a condition of development, to compensate on-site for the bowling green to the rear of 49 LCR.</p> <p>Contribute to continued regeneration of Streatham Hill on a strategically recognised Council site, providing an opportunity to deliver a transformative multi-use scheme.</p> <p>Not be in contravention of numerous Lambeth Local Plan and London Plan development policies.</p> <p>Not require demolition of a listed building, loss of community assets/green space or destruction of communal facilities for 49a LCR.</p> <p>Contribute to the ambition to reduce local car travel and switch to sustainable modes by removal of underused car park, closed for much of the past year.</p> <p>Plots of land required:</p> <p>Leigham Court Road car park and public toilets (council owned).</p> <p>Leigham Court Road single story parade of shops (potentially multiple ownership - though understand some are leased from Lambeth).</p> <p>Rear of 45 LCR - disused Synagogue to the rear.</p> <p>Rear of 47/49 LCR - former bowling green currently subject to Pocket Living proposal and owned by Pocket Living.</p>	
Individual	R1457	Other	Awful idea. This site is a well used and much needed car park. It will have knock on negative impacts for local shops and business'	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1462	Evidence	The car park is not closed, it is open, so to state this is incorrect	Noted. Para 2.3 of the Design Evidence Base will be amended to reflect that the car park has been closed at several intervals during 2021 and 2022 due to incidents of fly-tipping and antisocial behaviour. The car park has recently been reopened following the installation of a new entrance barrier.
Individual	R1464	Vision	Where did this come from? Not clear where the vision has arisen? Local people?	The vision is the culmination of Development Plan policy that applies to this site, consideration of the location, site constraints, surrounding land uses, and previous work on the Streatham Masterplan 2009. The Streatham Masterplan envisaged the creation of a linear block along Leigham Court Road between the High Road junction and Streatham

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>Close, to include ground floor retail units with a maximum of 4 storeys of residential above as a mixed-use scheme. While the Masterplan proposed improvements to the car park and a new refurbished WC, this is no longer compatible with the council's objectives of encouraging sustainable travel through Lambeth Local Plan Policy and its Climate Action Plan goals. Redevelopment of the site offers the opportunity for a more efficient use of land.</p> <p>Local communities have the opportunity to comment on the proposed Vision through the Regulation 18 consultation. Further public consultation will be held on the next draft of the SADPD.</p>
Individual	R1471	Vision	Another collection of undersized flats and more loss of public space. If the land needs to be developed then it should be at least useful. Social housing, commercial space. It's just depressing the way this council steam rolls these things through without consultation. This continues to happen. You will not have my vote	<p>All residential units will need to meet housing design and space standards, as well as external amenity standards as set out in London Plan policy D6 and D7 and Local Plan Policy H5. As the site is in public ownership, the affordable housing threshold at this site is 50% of which the tenure split is required to be 70/30 low-cost rented/intermediate accommodation, in accordance with London Plan Policy H5B.</p> <p>Local communities have the opportunity to comment on the draft SADPD through this Regulation 18 consultation. Further public consultation will be held on the next draft of the SADPD.</p>
Individual	R1481	Vision	Having read through the full evidence document and seen the imagery of the indicative approach, I do not think this will create benefit to the other local area other than more housin. It will close off the green space further and make a very urban area even more closed in and concrete. Surely it would be much more beneficial, to turn this in to an accessible community green space given the lack of it in this part of Streatham and to help offset the very heavy traffic. This is a terrible plan.	<p>Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use.</p> <p>Noted</p>
Individual	R1485	Vision Map	<p>If you remove the car park, where will vehicles then park? There are no other facilities in Streatham. It is not possible to take heavy items (or heavy shopping) on public transport so people will simply not shop in Streatham.</p> <p>I appreciate the need for housing but Lambeth can't keep its present stock in a habitable condition (Leigham Court Estate). This should be Lambeth's priority.</p>	<p>There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.</p>
Individual	R1488	Vision	We need fewer cars and less encouragement to drive so redeveloping a car park in a town centre the that is serviced by 2 stations and countless buses is a good proposal	Noted

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Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R1509	Vision	The site should increase the vision to include the closed synagogue and the bowling green behind 49 leigham court road to create something truly transformational	The site allocation policy strongly encourages applicants to explore the possibility for comprehensive redevelopment with adjacent sites. However, given different landownership and stages of redevelopment of those sites it is considered more appropriate to focus on the redevelopment of the Council owned site.
Individual	R1515	Vision	We need somewhere to park to utilise the shops that are on the high street. We don't need more shops or flats we need to keep the car park open!!	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1517	Vision	The most useful vision for this site is to update the existing provision of shopper's parking and toilets. There is very limited parking available in the area, meaning people travel further afield for larger shopping trips. There is poor public toilet provision in the area too.	Toilets have been closed since at least 2011. There is no policy requirement to reprovide disused public toilets. To find your nearest public toilet see the Great British Toilet Map. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1518	Vision	Leigham court road is in danger of being totally overdeveloped in terms of population, increasing traffic and exacerbating litter problems. However the green space is a good idea. There is a need for parking in the area though to support local shops. Concerns re lack of parking for local shops, more traffic and litter from shoppers and whether the homes would be truly affordable	Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use. The tenure split for the affordable housing provision is required by Local Plan policy H2 to be 70/30 low-cost rented/intermediate accommodation. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1518	Site Allocation Policy	The idea of low level and a sort of communal feel with other shops is good. Question whether the flats would be genuinely affordable	Noted. As the site is in public ownership, the affordable housing threshold at this site is 50% of which the tenure split is required to be 70/30 low-cost rented/intermediate accommodation, in accordance with London Plan Policy H5B.
Individual	R1518	Sustainability Appraisal	The area around there is already covered in litter and the pavement is tight due to positioning of bus stop. Would support this project if it meant more resources to make the area cleaner and clearer	Noted.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R1518	Context	It would be good to have clean public toilets available	Toilets have been closed since at least 2011. There is no policy requirement to reprovide disused public toilets. To find your nearest public toilet see the Great British Toilet Map.
Individual	R1518	Evidence	It is a wasted and derelict site at the moment, so restoration or regeneration of the site would be a good thing, depending on local impact.	Noted.
Individual	R1537	Vision	I desperately miss the car park since you closed it. It should stay as an affordable car park to support the local economy and local commercial properties. I am very very disappointed in this	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1548	Vision	What about car parking for those that need to drive?	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic. Alternative locations for parking for those who need to use a car can be found in close proximity to the existing car park, including Blue Badge space on Leigham Court Road, or pay by phone on nearby borough roads.
Individual	R1550	Vision	We already have ample commercial space in the Town Centre and many of them vacant properties. Prioritise should be given to looking at ways of attracting new retailers to these premises - not more coffee shops or cafes. We should also encourage bookies and pawn shops out of the area and put a limit on charity shops.	Active ground floor frontage in a town centre use will be required on the front part of the site. This could include Class E commercial, business and service uses which extend beyond retail and café uses. Local Plan policy PN4 states no more betting shops will be supported across the town centre as a whole.
Individual	R1550	Vision	What we do not have is adequate shopper's parking. With CPZs being introduced and Low Traffic Neighbourhoods and School Streets being introduced, parking issue becomes greater. The loss of this car park would be a disaster locally. However we try and encourage people to use public transport for shopping, or encourage local retailers to provide goods that can usually now only be found in out of town centre retailers (DIY goods, Furniture, White goods, Large Supermarkets etc.) people will still drive out to the likes of Purley Way, and start to totally ignore local shops because there is no available parking. The only shoppers parking we have is behind LIDL, and to park there you have to purchase goods from LIDL.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1562	Vision	The proposal will see the removal of an asset required by local businesses in respect of parking for shoppers. The area in general will also become too densely developed - yes there is a need for affordable and social housing but will there be the infrastructure to support this	As per the site allocation policy, the requirements of Local Plan Policy S2 in relation to new social infrastructure and assessment of anticipated impacts on existing social infrastructure will need to be addressed by any future applicant/developer. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1593	Vision	Positive. Need more housing. The ideal location for a higher density development given its location so close to excellent public transport. Opportunity to go for a car-free development	Noted.
Individual	R1594	Vision	Parking....or the lack of it! When and where are you planning for more parking?	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1596	Vision	We need more parking spaces in streatham to facilitate shoppers and bring footfall to the high street. Why not build a architecturally innovative multi-storey car park that will be a benefit to all, not just a few.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1598	Vision	The affordable housing, as we all know, never ends up as affordable. It's the biggest open secret in the building trade, and treats us residents and local community users like idiots.	The affordable housing threshold at this site is 50% of which the tenure split is required to be 70/30 low-cost rented/intermediate accommodation.
Individual	R1598	Vision Map	We lose one of the very few public car parks, with no replacement? This is strangling local businesses - the current car park has been neglected and I inviting for years, which has allowed the argument to grow that this is 'unused'. It isn't, it's just 'threatening'. I'm a cyclist. I'm a motorcyclist. I'm a car driver. And I walk. My 84 year old relative can do none of these things, and public transport is poor for her. She relies on the family to drive her to the local shops. This proposal will put an end to that for her and many, many like her. <clap hands emoji>	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic. Alternative locations for parking for those who need to use a car can be found in close proximity to the existing car park, including Blue Badge space on Leigham Court Road, or pay by phone on nearby borough roads.
Individual	R1598	Context Map	Why no replacement of the only public car park? The community loses a car park with nothing in return? It might be a neglected, threatening space at the moment, but it belongs to the community in the care of Lambeth. What equivalent public space do we get in return for the building?	The site has a Public Transport Accessibility Level of 6a which is considered excellent. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals.
Individual	R1598	Sustainability Appraisal	What does the community get back for losing our community space looked after by us by Lambeth (at the moment a threatening 'car park' that was so neglected it had to be closed? Whatever anyone thinks of the space, it is currently a public space, and this development will take it away from the community and give it to the residents of the new flats. What exactly do we get in return (actual space)? In this proposal, all our community is offered in return are 'beneficial' and 'balanced' sight lines (in the designers/developers view of course) and new retail space (there is empty retail space exactly opposite this site). Our lost community space should be replaced with new community space of equal size. Developers 1 Community 0.	The sites current lawful use is a car park. The Council can, in some circumstances, make use of its own assets to help deliver its objectives for sustainable and inclusive growth, either by bringing forward development directly or by working in partnership with others. As the site is in public ownership, the threshold level of affordable housing would be 50% as set out in London Plan Policy H5B. Developing this site would bring significant public benefits, proving much needed affordable housing in the context of Lambeth's significant waiting list for social housing.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R1663	Vision	This site could provide much need toilet facilities as well as parking and some housing, which is badly needed. I think it could utilise the closed synagogue behind No 45 as well as the bowling green, ideally allowing for some green space to remain. this would be both functional as well as in keeping with community values. AS such I think it is a really good idea	The site allocation policy strongly encourages applicants to explore the possibility for comprehensive redevelopment with adjacent sites. However, given different landownership and stages of redevelopment of those sites it is considered more appropriate to focus on the redevelopment of the Council owned site. There is no policy to protect or reprovide car-parking. The toilets have been closed since at least 2011. There is no policy requirement to reprovide disused public toilets. To find your nearest public toilet see the Great British Toilet Map.
Individual	R1744	vision	I am concerned about the loss of the car park amenity and the impact that the loss of the car park will have on local businesses.	The site has a Public Transport Accessibility Level of 6a which is considered excellent. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals.
Individual	R1768	Vision	While I appreciate the need for more affordable housing and commercial space in Streatham, I can not support this vision as it result in more need for parking which is already in such short supply. If the Leigham Court Road Car park is not open to locals and shoppers visiting the high road it will create more congestion on the roads and only make the current parking nightmare worse. Businesses on the highroad need to be accessible or they will not survive.	There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic.
Individual	R1783	Vision	I would entirely support the redevelopment of this site, especially if it could be combined with the redevelopment of the old bowling Green in order to provide any facilities of use to the wider community.	The site allocation policy strongly encourages applicants to explore the possibility for comprehensive redevelopment with adjacent sites. However, given different landownership and stages of redevelopment of those sites it is considered more appropriate to focus on the redevelopment of the Council owned site.
Individual	R1844	Site Allocation Policy	1. I am concerned that there is no reference to the re-provision of any town centre car parking. The implicit decision to permanently close this car park has not been through any public consultation process. Although it has been unavailable for much of the last year while dealing with the consequences of fly-tipping, there is probably still some demand for off street car parking, that is currently being accommodated by on street parking further from the High Road. With the recent implementation of the St Leonards North CPZ, there will be increased parking stress in the streets south of Streatham Hill station, and it is also likely that pressure will grow for controlled parking in Streatham Wells. The Council should do fuller research on the parking needs of local shoppers and traders before taking forward closure of this facility.	The site has a Public Transport Accessibility Level of 6a which is considered excellent. There is need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals.
Individual	R1844	Site Allocation Policy	2. Given that this site is at the edge of the town centre, I do not believe that it is critical that there is an active frontage. It is more important that the site re-provides a base for local street cleaning services and other environmental support services for the town centre that I understand are currently provided from the former toilet block and the immediately adjacent portion of the site. These essential functions need to continue	The site allocation policy strongly encourages applicants to explore the possibility for comprehensive redevelopment with adjacent sites. However, given different landownership and stages of redevelopment of those sites it is considered more appropriate to focus on the redevelopment of the Council owned site. Accommodation of the street cleaning equipment behind the disused toilets

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			to be housed close to the town centres so that operatives do not have to waste shift time travelling into the area. 3. I strongly support the suggestion that this site should be looked at in combination with the adjacent sites. The adjacent predominantly single storey parade of shops to the west was identified in previous development plans as having development potential - although I believe any redevelopment should retain affordable commercial leases and look to retain/recreate the popular Where the Wild Things Are mural. The site immediately to the east of the car park is currently occupied by the South London Synagogue, which has recently announced its closure. This should also be considered as part of a brief for a wider redevelopment site, that establishes appropriate access from Leigham Court Road without causing undue disturbance to the occupants of the South Lodge sheltered housing.	is a temporary arrangement. New arrangements for the Streetcare Team are currently under discussion. The site is within the Streatham town centre boundary and therefore active frontage is appropriate and helps contribute to improve the public realm along Leigham Court Road, creating an attractive gateway to the town centre from the south.
Individual	R1844	Site Allocation Policy	4. I agree that this is not a suitable site for a tall building. 5. I strongly support protection of trees on the site boundary and that the scheme should not overshadow the Victorian buildings in the conservation area.	Noted.
Individual	R1844	Vision	As noted on my comments on the site text, this may not be the best site for an active frontage, if this prevents re-provision of street cleaning and other environmental services for Streatham Town Centre. This site of itself if not a gateway site, unless the trees next to the adjacent Victorian houses are felled. It has the potential to be part of a gateway site if there was a wider development of the adjacent parade.	The term active frontage relates to one which has activity - such as a shop front. It does not imply a use that would spill out onto the footway.
Individual	R1844	Vision Map	I strongly support the recognition of the importance of the trees on three of the boundaries, notwithstanding that I would like the council to consider the possibility of looking for a linked development with the South London Synagogue site to the east.	Noted. The site allocation policy strongly encourages applicants to explore the possibility for comprehensive redevelopment with adjacent sites. However, given different landownership and stages of redevelopment of those sites it is considered more appropriate to focus on the redevelopment of the Council owned site.
Individual	R1844	Context	1. I do not think this is a fully accurate description of current use of the site. The area to the rear of the former public toilets provides a base for Lambeth's streetcare team serving the Streatham Town Centre. This is an important local function that needs to be retained on a site close to the town centre. 2. South Lodge is wrongly described as a nursing home when it is in fact sheltered housing.	Noted. References to South Lodge being a nursing home will be corrected to 'retirement housing'. Accommodation of the street cleaning equipment behind the disused toilets is a temporary arrangement. New arrangements for the Streetcare Team are currently under discussion.
Individual	R1844	Evidence	The evidence document wrongly states that "The public conveniences and car park have both been closed for several years." While it is true that the council closed the conveniences some twenty plus years ago,	Noted. Para 2.3 of the Design Evidence Base will be amended to reflect that the car park has been closed at several intervals during 2021 and 2022. The car park has recently been reopened following the installation of

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			the car park has only been temporarily closed for intermittent periods over the last few years due to fly-tipping issues during lockdown. In addition the site to the rear of the public conveniences is used by Lambeth for the provision of street sweeping services for Streatham Town Centre, and I believe part of the toilet block itself provides accommodation to support supplies/services for this function.	a barrier. Accommodation of the street cleaning equipment behind the disused toilets is a temporary arrangement. New arrangements for the Streetcare Team are currently under discussion.
Individual	R1844	Sustainability Appraisal	The failure to recognise that the site currently provides a base for Lambeth's town centre streetcare functions makes me think that the scorings for Item 14 are too favourable.	Noted. Accommodation of the street cleaning equipment behind the disused toilets is a temporary arrangement. New arrangements for the Streetcare Team are currently under discussion.

Officer Response to Reg 18 Representations: Site 7 – 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11

Officer Response to Reg 18 Representations: Site 7 – 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11

Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R0003	Other	I object to the proposed application for Wooden Spoon House on the below grounds. Tall tower is a precedent for other tall towers in Kennington	This draft policy is not a proposed application. The site-specific nature of a site allocation would not set a precedent for other tall buildings. Any tall building proposal would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Individual	R0003	Other	Tall tower will block sun and daylight for residents	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0003		Tall tower not compatible with Renfrew Road Conservation Area and listed Old Fire Station, Old Courthouse (Buddhist Centre), Master's House and Water Tower	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0003	Other	Poor access for road vehicles for number of residential units proposed, combined with light industrial use.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0003	Other	We want a lower density development that would protect the significance of the listed buildings, Conservation Areas and respect the prevailing building heights, density and massing of the surrounding residential properties.	Noted.

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			An example of a more sensitive and proportionate development, a mixed and balanced community is already evident and it is possible as demonstrated by the Bellway/Water Tower Estate Development which is adjacent to the consultation site.	
Individual	R0006	Other	<p>I am writing to you in reference to the proposed 16 storey tower block on the Jewson and Wooden Spoon House site in Kennington.</p> <p>I object to this building being built due to the following:</p> <ul style="list-style-type: none"> • I live near the proposed site and the building of this block would block daylight and sunlight into my flat. 	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0006	Other	There would be parking and access issues which would cause traffic problems in the area	<p>In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.</p>
Individual	R0006	Other	There would be a negative impact on local heritage assets in the area	<p>The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.</p>
Individual	R0006	Other	The tower sets a precedent for other tower blocks in this low rise area. Thank you for considering my objections.	<p>This draft policy is not a proposed application. The site-specific nature of a site allocation would not set a precedent for other tall buildings. Any tall building proposal would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.</p>
Individual	R0010	Other	<p>I would like to lodge my objection to the Proposed Site 7 on your website - here</p> <p>My reasons to object are as follows:</p> <ol style="list-style-type: none"> 1) Inappropriate design and density adversely affecting residential amenity: <ul style="list-style-type: none"> • Height and bulk of proposed tall tower would overshadow existing 	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p>

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			homes, blocking daylight and sunlight, with homes to north, east and west of the tower most severely affected	The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0010	Other	Potential for noise and privacy issues from windows, balconies and terraces close to and overlooking existing residents	Noted. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0010	Other	Detrimental impact on heritage assets and conservation areas. Harmful impact on setting of heritage assets including the Grade II Old Fire Station and Old Court House (Jamyang Buddhist Centre) which would be negatively impacted by a tall tower	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0010	Other	Large, bulky, tall building up to around 16 storeys high would have a harmful impact on Conservation Areas including Renfrew Road and Elliotts Row	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0010	Other	Impact on surrounding Kennington area • Tall tower will be against the character of the low-rise surrounding area. Will be outside of the Elephant and Castle tall buildings cluster and therefore stand out	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms. The indicative approach identifies suitability of a tall building at circa 50m in height. Given

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				the height the assessment has concluded that its effect would not be unacceptable in principle.
Individual	R0010	Other	Sets precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings	This draft policy is not a proposed application. The site-specific nature of a site allocation would not set a precedent for other tall buildings. Any tall building proposal would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Individual	R0010	Other	I and other residents in the vicinity want a lower density development that would protect the significance of the listed buildings, Conservation Areas and respect the prevailing building heights, density and massing of the surrounding residential properties. An example of a more sensitive and proportionate development, a mixed and balanced community is already evident and it is possible as demonstrated by the Bellway/Water Tower Estate Development which is adjacent to the consultation site. Please can you formally register my objection and ensure that I get any updates on this consultation in future.	noted
Individual	R0014	Other	I am writing to lodge a firm objection to the proposed redevelopment. It is plainly insulting to propose erecting a tall tower of such height in this location.	noted
Individual	R0014	Other	It will block light from local residents.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0014	Other	It is definitely not compatible with the architecture of the Renfrew Road Conservation area.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an

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				unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0014	Other	Importantly, proposed access to this site from Dugard Way is not practical and would be dangerous.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.
Individual	R0014	Other	And, of course, this would set a very bad and damaging precedent for tall towers in Kennington. This is something the local residents have made quite clear to Lambeth Council. We do not want to destroy the character of the neighbourhood we value greatly.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site-specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R0014	Other	I worry about allowing buildings in excess of about 40 metres here.	Noted.
Individual	R0015	Other	This proposal for the developments within Jewson and Wooden Spoon House are damning for the existing low rise residential housing of north east Lambeth boundary area. We deserve to have our low rise residential area that is already full of heritage and conservation sites, to remain without towers, this is in line with the existing Lambeth Local Plan - NOT to place high rise in north east Lambeth low rise residential area.	Noted.
Individual	R0015	Other	Lambeth Council has an existing criminal conviction for poor decisions taken on high rise residential building in Kennington, the explosion inside Kerrin Point in 1997 was found by the HSE to be shameful and negligent behaviour by Lambeth council, having had a serious impact on the residents including those who died in the weeks following losing their homes due to heart attacks and strokes or those suffered massively from PTSD due to Lambeth's negligence before during and after this gas explosion. As a resident and survivor of the Kerrin Point disaster the idea of new high rises being built in my neighbourhood renews my valid fears and makes me feel physically sick that profit is still pushed by Lambeth ahead of the residents.	It is acknowledged that fire safety of developments needs to be considered from the outset. Any proposed major development that comes forward would be required to demonstrate through a planning application compliance with policy D12 'Fire Safety' of the London Plan as well as any relevant guidance when it is adopted (such as 'Fire Safety London Plan Guidance'). In addition, the Government's system of fire safety gateways requires fire safety information for relevant buildings to be submitted at planning application stage (Gateway 1) which is referred to and assessed by the Health and Safety Executive as part of the planning application process.
Individual	R0015	Other	These development proposals, both Jewson/woodenspoon House and Woodlands Nursing Home/Water Tower proposals are failing to provide permanent homes for Lambeth council waiting lists on social rent. If these proposals are not tackling the massive backlog of Lambeth residents and homeless then they are just for sheer profit for developers and not thinking of city planning or the impact on existing residents affected by these disproportionately large buildings eating our access to the sky, stealing our light, increasing our house bills and impacting our lives due to living with less daylight.	Any major proposal involving residential development would be required to provide affordable housing in accordance with London Plan policies H4 and H5 and Lambeth Local Plan H2. The mix of tenures will be fully considered at the time a planning application is brought forward on the site and Local Plan Policy H2 will apply. Planning policy needs to be based on the best available acknowledged, and the affordable housing requirements set out in Lambeth Local Plan policy H2 is based on acknowledged of local housing need in Lambeth. With regards to light issues, the indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes

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				forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0015	Other	Large buildings also create wind tunnels and leave low rise residents living in the shade of these buildings, rain will not evaporate as quickly and leave us damp and dark.	Noted.
Individual	R0015	Other	This proposal is south to our area and will lower our daylight as we live north of this development and our property faces east west, our sun and light comes from the south.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0015	Other	I welcome Lambeth development for the homeless and Lambeth social housing wholeheartedly, it just needs to be suitable for families and in keeping with the neighbourhood and local landscape. High rises in Lambeth are based in Vauxhall, stick to this area only.	Comment regarding residential development are noted. The mix of homes will be fully considered at the time a planning application is brought forward on the site. Local Plan Policy H4 will apply, which acknowledges the need for family accommodation, in particular family-sized affordable homes.
Individual	R0017	Other	I object to the proposed site 7 Kennington lane development. There is no consideration for the effect this development will have on peoples homes. It is inappropriate and will overshadow existing homes, block sunlight and daylight.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to

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				daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0017		It will add traffic and serious pollution to an already congested route.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0017	Other	It would create noise and privacy issues for local residents as it would overlook all existing buildings.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0017	Other	It is detrimental to the heritage and conservation areas locally. It is against the character of the low rise area which is itself outside the elephant and castle cluster of mostly empty and very ugly high rise cluster.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0017	Other	It is outside the areas identified in Lambeth local plan as being appropriate for tall buildings.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10 of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies. development (subject to policy criteria being met).
Individual	R0017	Other	It's horrible.	Noted.
Cllr Davies (Labour)	R0019	Other	I oppose the positioning of a tall building on this site for the following reasons: 1. The materials involved in tall buildings will not support our carbon-	Noted. Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy

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			neutral ambitions. With every extra metre in height more concrete, steel etc is needed.	and decision-making. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.
Cllr Davies (Labour)	R0019	Other	To obtain the sort of housing densities we are suggesting for this site low rise, e.g. up to 5 floors would be in keeping with other local developments beside the water tower and on Cottington Close Estate.	Noted. However, the Cottington Close Estate and nearby Cotton Gardens Estate both contain development noticeably higher than 5 storeys.
Cllr Davies (Labour)	R0019		Such homes offer fewer safety concerns of Grenfell,	It is acknowledged that fire safety of developments needs to be considered from the outset. Any proposed major development that comes forward would be required to demonstrate through a planning application compliance with policy D12 'Fire Safety' of the London Plan as well as any relevant guidance when it is adopted (such as 'Fire Safety London Plan Guidance'). In addition, the Government's system of fire safety gateways requires fire safety information for relevant buildings to be submitted at planning application stage (Gateway 1) which is referred to and assessed by the Health and Safety Executive as part of the planning application process.
Cllr Davies (Labour)	R0019	Other	Such homes offer a more human scale of housing and will not dominate homes that exist already.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Cllr Davies (Labour)	R0019	Other	Not having a tall building will mean that the two land parcels that make up this site could be developed independently as may well be the case.	The draft site allocation policy recognised that the site may come forward in two phases. The revised draft policy wording does not restrict the acceptability of a tall building to a scenario where both parts of the site come forward at the same time.
Individual	R0022	Other	I would strongly like to object to the proposed development for several reasons: 1. The proposed new buildings will be out of keeping with the historical buildings such as the Grade II Old Fire Station and Old Court House;	Noted.

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Individual	R0022	Other	2. The tall buildings proposed to be developed will break the pattern of clustering of tall buildings and set a precedent for high rise building in any location as opposed to specifically designated areas;	The site-specific nature of a site allocation would not set a precedent for other tall buildings. Any tall building proposal would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Individual	R0022	Other	3. Daylight and sunlight will be blocked by the proposed new high rise buildings, compromising the residential amenity of the existing housing and residences in the immediate vicinity of the development site.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0022	Other	Traffic and noise levels will increase, adversely affecting the quality of life of existing residents in close proximity to the development site. Please take into consideration the legitimate concerns of existing residents in the area before proceeding with these ill-conceived development proposals.	The comments are noted. At planning application stage, the London Plan policy D14 'Noise' would apply which requires mitigation measures to be incorporated to ensure that there is no unacceptable impact with regards to noise.
Individual	R0025	Other	I am extremely concerned about the potential redevelopment of the Jewson's and Wooden Spoon site, which is directly adjacent to the boundary with Southwark. Any development should be sensitive and proportionate, and I am very worried that the vision for a tall tower (50m) will loom over its neighbouring buildings, all of which are well under half the proposed height (only one is 25m and the remaining seven are very low, including 11m).	The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0025	Other	I am most worried that this will set a precedent for other sites, including the redevelopment of the Woodlands nursing home, which has been vehemently objected to by the local community.	The site-specific nature of a site allocation would not set a precedent for other tall buildings. Any tall building proposal would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.

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Individual	R0025	Other	A tall tower will be out of place in a low-rise residential area and is outside the tall building cluster found at E&C.	Noted.
Individual	R0025	Other	It will also have a negative effect on the local heritage sites - indeed, part of the site falls within the local conservation area!	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0025	Other	Lastly, a tall and bulky building would overshadow existing homes, with loss of privacy and sunlight.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0025	Other	Access to the site should not be from Dugard Way, a narrow passageway, and an entrance from the "A" road from Kennington Lane, a very busy through road, will inevitably cause more congestion.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses

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				on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0025	Other	I am not opposed to the redevelopment of the site, but it must be sympathetic to its environs. What is being suggested is out of place and inappropriate.	Noted.
Individual	R0034	Other	I am a resident of Dolphin House and am extremely disappointed that you are proposing a development structure that will impinge on not only my personal rights as a resident of Lambeth but also others. I have viewed the proposed plans and I object entirely to this development for the following reasons: INAPPROPRIATE DESIGN, LAYOUT AND DENSITY ADVERSELY AFFECTING RESIDENTIAL AMENITY No consideration of effects on people's homes in Lambeth Council's acknowledged document.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0034	Other	Height and bulk of proposed tall tower would overshadow existing homes, blocking daylight and sunlight, with homes to north, east and west of the tower most severely affected. Such a development will block out sunlight to not only my property and that of other residents within Dolphin House, it will also cause issue for residents on Renfrew Road and surrounding estates and roads.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0034	Other	Potential for noise and privacy issues from windows, balconies and terraces close to and overlooking existing residents. My flat is located [redacted] and so any such build would significantly impact my personal privacy as well as my neighbours next to and above me. Furthermore, as [redacted] I am extremely concerned how this proposed development will infringe my privacy and ability to feel safe in my home. Especially as, from what I have seen of the proposed development, there will be windows facing my property, in extremely close proximity,	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and

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			with direct and unobstructed views into my flat bedroom and living room.	sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0034	Other	Delivery and servicing access and parking issues for development – access off red route "A" roads at busy Kennington Lane, Kennington Park Road and Newington Butts junction. No access should be from Dugard Way which is too narrow.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0034	Other	There are already parking issues within this area and limited parking spots for residents. This is clear from the limited spaces which were permitted for Dolphin Housing, which struggles to provide accessible parking for their residents.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.
Individual	R0034	Other	Further, it is clear that such a development would negatively impact the air surrounding this area of Lambeth by increasing pollution levels. There are already many young families, vulnerable and elderly people and a nursery and primary school in close proximity (at the back of Renfrew Road and Gilbert Road. The proposed development will negatively impact our lives and also, rise the potential of health problems because of the rise in pollution from such a new build not only in the building stage but also once they become populated with residents.	The comments are noted. At planning application stage, the London Plan policy SI 1 'Improving Air Quality' and Lambeth's Air Quality Action Plan would apply. It requires mitigation measures to be incorporated to ensure that that there is no unacceptable impact with regards to air quality including construction phase and occupation.
Individual	R0034	Other	DETRIMENTAL IMPACT ON HERITAGE ASSETS AND CONSERVATION AREAS This development will have a harmful impact on setting of heritage assets including the Grade II Old Fire Station and Old Court House (Jamyang Buddhist Centre) which would be negatively impacted by a tall tower.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0034	Other	Also, such a large, bulky, tall building of up to around 16 storeys high would have a harmful impact on Conservation Areas including, but not limited to, Renfrew Road and Elliots Row.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0034	Other	IMPACT ON SURROUNDING KENNINGTON ARE Tall tower will be against the character of the low-rise surrounding area. Will be outside of the Elephant and Castle tall buildings cluster and therefore stand out	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms.

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Individual	R0034	Other	This will inevitably set a precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings. Therefore, I lodge my objection formally for the above-stated reasons.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10 of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Gloucester County Council Mineral and Waste Planning Authority	R0048	General	M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to: - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential M&W OFFICERS RAISE NO OBJECTION M&W officers have reviewed the consultation information and have no further comments to make.	Noted.
Individual	R0057	Other	I would like to submit my objection for: Proposed Site Allocation 7, part of the Draft Lambeth Site Allocations Development Plan Document (SADPD) For the following reasons: 1) INAPPROPRIATE DESIGN, LAYOUT AND DENSITY ADVERSELY AFFECTING RESIDENTIAL AMENITY No consideration of effects on people's homes in Lambeth Council's acknowledged document Height and bulk of proposed tall tower would overshadow existing homes, blocking daylight and sunlight, with homes to north, east and west of the tower most severely affected	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant

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				guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0057	Other	Potential for noise and privacy issues from windows, balconies and terraces close to and overlooking existing residents	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0057	Other	Delivery and servicing access and parking issues for development – access off red route "A" roads at busy Kennington Lane, Kennington Park Road and Newington Butts junction.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0057	Other	No access should be from Dugard Way which is too narrow.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.
Individual	R0057	Other	2) DETRIMENTAL IMPACT ON HERITAGE ASSETS AND CONSERVATION AREAS Harmful impact on setting of heritage assets including the Grade II Old Fire Station and Old Court House (Jamyang Buddhist Centre) which would be negatively impacted by a tall tower	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0057	Other	Large, bulky, tall building up to around 16 storeys high would have a harmful impact on Conservation Areas including Renfrew Road and Elliots Row	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0057	Other	3) IMPACT ON SURROUNDING KENNINGTON AREA Tall tower will be against the character of the low-rise surrounding area. Will be outside of the Elephant and Castle tall buildings cluster and therefore stand out	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms.
Individual	R0057	Other	Sets precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10

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				of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Individual	R0094	Other	I wish to object to the plan for a 50m tower on the Jewson's site on Kennington Lane. This site is outside the Elephant and Castle development area, with housing and historic building packed tightly around it.	Noted.
Individual	R0094	Other	A tower here would overshadow the existing housing on all sides of it.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0094	Other	It would also compromise the adjacent listed buildings and conservation area. This complex of unique old buildings, including the Old Courthouse and Fire Station, along with the old workhouse, now the Cinema Museum constitute a valuable cultural asset. They would all be badly affected by a tower on this site.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0094	Other	The new Knight's Walk and existing Water Tower estates are sympathetic mixed tenure housing developments here, which should serve as a guide and precedent to any development on the Jewson's site.	Noted.
Individual	R0125	Other	I would like to submit my objection for: Proposed Site Allocation 7, part of the Draft Lambeth Site Allocations Development Plan Document (SADPD) For the following reasons: 1) INAPPROPRIATE DESIGN, LAYOUT AND DENSITY ADVERSELY AFFECTING RESIDENTIAL AMENITY No consideration of effects on people's homes in Lambeth Council's acknowledged document	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing

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			Height and bulk of proposed tall tower would overshadow existing homes, blocking daylight and sunlight, with homes to north, east and west of the tower most severely affected	neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0125	Other	Delivery and servicing access and parking issues for development – access off red route "A" roads at busy Kennington Lane, Kennington Park Road and Newington Butts junction. No access should be from Dugard Way which is too narrow.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0125	Other	2) DETRIMENTAL IMPACT ON HERITAGE ASSETS AND CONSERVATION AREAS Harmful impact on setting of heritage assets including the Grade II Old Fire Station and Old Court House (Jamyang Buddhist Centre) which would be negatively impacted by a tall tower	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0125	Other	Large, bulky, tall building up to around 16 storeys high would have a harmful impact on Conservation Areas including Renfrew Road and Elliotts Row	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0125	Other	3) IMPACT ON SURROUNDING KENNINGTON AREA Tall tower will be against the character of the low-rise surrounding area. Will be outside of the Elephant and Castle tall buildings cluster and therefore stand out	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms.
Individual	R0125	Other	Sets precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings.	The site-specific nature of a site allocation would not set a precedent for other tall buildings. Any tall building proposal would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Individual	R0146	Other	The major objection to the proposed development is the inclusion of a tower.	Noted.

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			The maximum height of the surrounding buildings is five stories and this should be the maximum allowed for any development on this site. A development in the style of the surrounding blocks - Goddard House, Limelight House and Dolphin Living Development - which have been built in the past ten or so years should give a guide to the scale of the development on this site.	
Individual	R0146	Other	Even such a level of development, if not sensitively distributed, could have a negative impact on the adjacent Grade II listed Old Fire Station and Old Court House. A tall tower would completely swamp these heritage assets.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0146	Other	The errors made in constructing the towers on the Cotton Gardens Estate further along Kennington Lane should not be repeated on this site. The neighbouring Water Tower development provides a good example of how a group of modern accommodation blocks can be built around existing heritage buildings to enhance not denigrate the locality.	Noted.
Individual	R0150	Other	As a local resident I would like to register my objection to the size and scale of the proposal. Like many people, I can see that the buildings being proposed for development are suitable for housing and could enhance the local area, however the size and scale is inappropriate and hugely detrimental.	Noted.
Individual	R0150	Other	I live in a property whose light and privacy would be severely adversely affected by this development. My property is part of a conservation area and would be literally overshadowed and	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of

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				the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0150	Other	pedestrian/bike/scooter access would have a high impact via the 'servicing route'.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.
Individual	R0150	Other	In addition The proposed development of a tall tower on this site is not current policy and is not in an area identified in the Lambeth Local Plan 2021, or its supporting documents, as a site suitable for a tall tower. As identified in the appeal for the Woodlands the site is also next to an area designated in the Elephant and Castle Opportunity Area Framework as being suitable for lower rise development. This should be given greater weight in considering proposed uses for this Kennington Lane (Site 7).	The site-specific nature of a site allocation would not set a precedent for other tall buildings. Any tall building proposal would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10 of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Individual	R0150	Other	Precedent developments No tower developments currently built in the Elephant and Castle Opportunity Area have had existing homes on their north side so close to the development site. My home will be most affected by loss of daylight and sunlight. There are more suitable development precedents in the vicinity, including Lambeth Council's own Knight's Walk, 130- 138 Newington Butts (now known as 2 Kennington Lane and 3 Holyoak Road) and Manor Place Depot (which is within the Elephant and Castle Opportunity Area).	The site-specific nature of a site allocation would not set a precedent for other tall buildings. Any tall building proposal would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to

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				good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide. tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Individual	R0150	Other	Heritage: There is likely to be harm to heritage assets both immediately adjacent to the development site and more distant. These harms will be predominantly from the proposed tower and its adjacency to, and effect on, the setting of the Old Fire Station, the Old Courthouse and the associated Renfrew Road Conservation Area, and on the Water Tower and the Master's House.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0150	Acknowledged	Acknowledged presented is misleading The Acknowledged Report contains a visual at Figure 17. However it shows shadows from right at the end of the day, as the sun goes down in the west. This obscures the fact that for much of the day the tall tower would devastate the sunlight and daylight for existing homes to the north and west.	The townscape and heritage views within the acknowledged document do not constitute part of the daylight and sunlight assessment. An independent assessment has been undertaken on the daylight and sunlight impacts of the revised indicative approach. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0150	Acknowledged	The assessment of views also extends this same basic error, with sun shining brightly from the west. Some of the assessment of local views misrepresents the likely effects with the worst, but by no means the only, misrepresentation being the presentation of the likely effects on the view between the Old Courthouse and the Old Fire Station. This assessment shows the tall tower barely visible behind the Old Courthouse when In reality, a few paces along the road towards	Noted. It is accepted that not all views have been tested. For the indicative approach only a selection of key views has been assessed. Any applicant would be required to provide a fuller analysis at application stage

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			Kennington Lane would show the tower to most of its extent in the gap between the buildings, above the Old Courthouse yard.	
Individual	R0150	Acknowledged	<p>Transport and servicing</p> <p>Access to the proposed development is dismissed in couple of lines in the Acknowledged Report (para 4.3). However this is a site located at the junction of two TfL Red Routes, where traffic regularly backs up along Kennington Lane beyond the pedestrian crossing and, in peaks particularly, is often queuing northbound well back past Cottington Street. The text states that there is to be no new north south access between Kennington Lane and Dugard Way, but Figure 16 appears to show just that. There can be no substantive access to the development via Dugard Way. The infrastructure is not capable of accommodating it. Based on acknowledged from the “Uncle” development, the number of deliveries per day will be substantial and need to be accommodated. This does not appear possible along the “lane along the western side of the site” (para 4.3) which, in the absence of any detail is assumed to be the one currently providing the only access to the front door of number 34A Kennington Lane.</p>	<p>As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use. Re the reference to access at para 4.3 of the Acknowledged Report - Acknowledged Report should be amended e.g. Fig 1 red line doesn't include the “lane along the western side of the site”</p>
Individual	R0150	Vision	<p>Lack of realistic development considerations Many of the “asks” within the Acknowledged Report would affect the viability of the site and would push the development of a tall tower even higher to achieve developer returns:</p> <ul style="list-style-type: none"> - requiring the reprovision of an element of light industrial floorspace will affect the viability of the site and push developers to a taller building to make what they consider a realistic return - the inclusion of a “public square” will reduce significantly the developable area and likewise push the tower higher - the inclusion of basement parking and servicing would substantially increase build cost and push the tower even higher to cover the cost. 	<p>The quantum set out in the draft DPD are approximate, informed by high-level testing of the optimum level of development that could in principle be accommodated on the sites. It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development plan. These development proposals will be assessed in detail through the planning application process. The required quantum of light industrial space is in line with London Plan policies applicable to all sites with non-designated industrial uses. The site is located in an area of open space deficiency and therefore Local Plan policy EN1 applies which requires the provision of new open space, however this does not have to be in the form of a “public square”. The policy does not include a requirement to provide basement level parking.</p>
Individual	R0150	Acknowledged	<ul style="list-style-type: none"> • Lack of detailed study: This proposal has been put forward in with no detailed consideration of the potential effects of a tall building on this site. There are likely to be significant effects on amenity, on daylight and sunlight and on heritage assets (listed building and conservation area). Whilst the latter is acknowledged in the consultation material no detailed study appears to have been undertaken. 	<p>Noted. The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable. The acknowledged base and associated independent daylight and sunlight study are deemed sufficient for the purposes of plan making. Any applicant would be required to undertake more detailed work to justify their proposals. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to</p>

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				<p>sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0150	Acknowledged	The potential for effects on amenity of neighbouring homes is barely mentioned at all. In a dense urban areas such as this, these effects could be significant.	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R0150	Acknowledged	The conclusion of the Acknowledged Report claims that the indicate approach has been "tested at the level of general massing and height to ensure acceptable impacts in relation to daylight and sunlight..." but there is no acknowledged presented that this has been the case. Proposing a tall tower which, if this policy is approved will effectively be "baked in" to the plans for the site, is reckless without that more detailed study of the likely effects on people's homes.	<p>Noted. The acknowledged base and associated independent daylight and sunlight study are deemed sufficient for the purposes of plan making. Any applicant would be required to undertake more detailed work to justify their proposals. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led</p>

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				approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Natural England	R0163	General	Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.	Noted.
Individual	R0272	Other	Hello I am a resident of [Redacted], I believe if the tower block is built on this proposed site it would be very detrimental to all surrounding buildings. It will take away any of the minimal light my property gets, and in times of covid and working remotely the minimal light I get through my already shadowed windows is a god send. Building a tower block on the proposed site will take all light away	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0272	Other	as well this tower block will not be in keeping to the surrounding buildings at all.	Noted.
Individual	R0272	Other	It will devalue the surrounding buildings and put even further pressures to the infrastructure of the area the public transport is already struggling under the current amount of people in this area.	The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the acknowledged for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure. In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their

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				<p>use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal. With regard to unit mix, the mix of homes will be fully considered at the time a planning application is brought forward on the site. Local Plan Policy H4 will apply, which acknowledges the need for family accommodation, in particular family-sized affordable homes. The SADPD recognises that the site is located in an area of open space deficiency and Policy EN1 would apply at planning application stage. This includes a requirement to provide new open space on site or contribute to improvements to existing open spaces in the area.</p>
Individual	R0272	Other	If you do built this tower block you will be setting a presedent to the area which is not in keeping to this traditional Victorian area allowing further sky rises to come in, and even more of traditional London will be gone I hope you consider my views and see reason	The site-specific nature of a site allocation would not set a precedent for other tall buildings. Any tall building proposal would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Transport for London Spatial Planning	R0312	Other	Kennington Lane forms part of the TLRN. Any changes to access and proposals for transport interventions on the TLRN will need to be assessed by, and subject to, TfL agreement. Specifically, any proposals for changes to the access affecting the signalised junction and relocation of the crossing would need to be subject to a TfL Road Safety Audit and Technical Approvals process. All costs of changes to the signalised junction and/or crossing would need to be covered by the developer. This is a constrained section of the Inner Ring Road on the approach to a major junction, so any construction would need to be carefully managed. We welcome the statement that no servicing should take place from Kennington Lane and that the footpath along the frontage should be widened as part of the development. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development. Contributions towards active travel connections, cycle hire provision and buses may be appropriate.	Proposals for servicing noted. The developer contributions sought will depend on the scale and form of development proposed, which is not specified in the policy. As a result, the policy wording has been revised to ensure that the relevant policy considerations are highlighted, rather than to include specific mitigation measures that may or may not be required in practice.
Individual	R0355	Other	I strongly object to Lambeth Council's proposed plans to allow a tall tower of at least 16 stories on the above sites on Kennington Lane, with access from Renfrew road and Dugard Way, off Renfrew Road, for the following reasons: 1) Not compatible with the Renfrew Road low rise conservation area and will have a damaging impact on heritage assets therein which include the listed Old Fire Station, the Old Courthouse, the Master's House and the Water Tower.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.

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Individual	R0355	Other	2). Loss of daylight, sunlight and privacy. This area already suffers loss of these due to the overshadowing caused by the proximity of the three tower blocks recently built as part of the Elephant and Castle redevelopment scheme.	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0355	Other	<p>3). Pollution and noise generated from increased traffic, with consequent heightened hazard to health and well being of the local residents, already being exacerbated by the following:</p> <ul style="list-style-type: none"> a) diverted traffic caused by the closure of Dante road, b) access to and from Renfrew road from Kennington Road already necessitates passing two open sports/play areas of Archbishop Sumner Primary School which are in frequent use throughout the day, as well as Gilbert road, all of them heretofore quiet, narrow residential roads as was Renfrew road itself. c) the recent residential expansion of Knights Walk on Renfrew road d). the threatened prospect of the planned development of the Woodlands site currently unresolved due to objections to the proposed building of yet another tower block in its midst, for all of the above reasons. 	<p>The comments are noted. At planning application stage, the London Plan policy D14 'Noise', London Plan policy SI 1 'Improving Air Quality' and Lambeth's Air Quality Action Plan would apply. These require mitigation measures to be incorporated to ensure that there is no unacceptable impact with regards to noise or air quality.</p>
Individual	R0355	Other	4) Road access and movement within the site appears too limited and restricted for the number of residential and light industrial units proposed.	<p>In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use, and movement within the site would be limited to servicing and disabled parking provision.</p>
Individual	R0355	Other	5). The proposal is outside the areas identified in Lambeth Council's Local Plan as being appropriate for tall buildings.	<p>Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for other tall buildings. Any tall building proposal would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.</p>

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				Policy Q26B allows tall buildings to come forward outside identified locations.
Individual	R0355	Other	6). Creates a general sense of oppression amongst residents in the low rise area leading to a possible deterioration in mental health ultimately leading to social problems.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0497	Other	I wish to comment on the proposals for redevelopment of the above site, which would impact on me as a resident of [redacted], overlooking Wooden Spoon House. I welcome sympathetic redevelopment of the site, particularly if Wooden Spoon House is to be developed. However I object most strongly to any tower block or other high density buildings higher than 4 storeys. Such high density buildings on this site would seriously detract from the existing character of the area, have an adverse impact on the former Fire Station, magistrate's court, former workhouse, Cottingham Estate and existing surrounding buildings and fails to address two further key issues.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0497	Other	Your discussion paper identifies there is insufficient local green community space.	It is acknowledged that the site is located in an area of open space deficiency and Policy EN1 of the Local Plan will apply to any proposals on this site.
Individual	R0497	Other	The paper also mentions scope to widen pavements in Kennington Lane - traffic at some times of day is a serious problem with very slow-moving traffic queuing as it approaches the main junction with Newington Butts. The new development must not make the problem worse and must help resolve the issue.	Noted.
Individual	R0497	Other	The local and immediate infrastructure is inadequate to accommodate high density residential use and it must not have an adverse impact on existing residents. Most new residential development in the area targets younger, physically able people who are likely to work in central London, to the disadvantage of very young families and older residents who rely on having convenient access to amenities. High rise does not do this. There is a need for more developments like nearby Knights Walk, plus safe space for sport and relaxation.	The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the acknowledged for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure. In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g.

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				<p>policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal. With regard to unit mix, the mix of homes will be fully considered at the time a planning application is brought forward on the site. Local Plan Policy H4 will apply, which acknowledges the need for family accommodation, in particular family-sized affordable homes. The SADPD recognises that the site is located in an area of open space deficiency and Policy EN1 would apply at planning application stage. This includes a requirement to provide new open space on site or contribute to improvements to existing open spaces in the area.</p>
Individual	R0497	Other	Light industrial use, ideally in smaller, self contained units, should enhance the local community and local employment, particularly if it can be developed with the cooperation of the local universities or Lambeth College (I can put you in touch with key people at Board level at both LSBU & Lambeth College).	Noted.
Individual	R0497	Other	If Lambeth Council want tower blocks, build them nearer to Nine Elms.	Noted.
Mums for Lungs	R0501	Site Allocation Policy	<p>We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document.</p> <p>We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings.</p> <p>As acknowledged by Lambeth cabinet last November, “Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough.” Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document.</p> <p>Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.</p>	<p>One of the Strategic Objectives of the Lambeth Local Plan is ‘Tackling and adapting to climate change’. The Council is committed to ‘Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes’. These strategic overarching principles are also applicable to the SADPD PSV.</p> <p>The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy S11. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.</p> <p>The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth’s Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council’s work.</p>
Mums for Lungs	R0501	Transport	Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough.	Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess

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			<p>We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?</p>	<p>the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.</p>
Mums for Lungs	R0501	Transport	<p>In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.</p> <p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It's equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p> <p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth council so that they become a tangible, positive reality for everyone living and working in the borough.</p>	<p>In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking.</p> <p>Other London Plan policies will be applicable, such as Policy T1 'Strategic approach to transport', T2 'Healthy streets' and T5 'Cycling', that set the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.</p>
Individual	R0517	Other	<p>As a Kennington resident, I'm very concerned about the proposed developments. Architecturally, they are not in keeping with the conservation areas - their height will blight the vista and</p>	<p>The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.</p>
Individual	R0517	Other	<p>create privacy, [issues]</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2</p>

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				'Amenity' and H5 'Housing standards').
Individual	R0517	Other	pollution and congestion issues. Kennington Lane is already perpetually clogged with traffic so this structure will add to the noise and environmental pollution.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0517	Other	Tall buildings such as these have a poor carbon footprint and	Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land), an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building. London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG further require referable applications to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are both strongly encouraged. In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.
Individual	R0517	Other	after Grenfall, fire safety concerns as well.	It is acknowledged that fire safety of developments needs to be considered from the outset. Any proposed major development that comes forward would be required to demonstrate through a planning application compliance with policy D12 'Fire Safety' of the London Plan as well as any relevant guidance when it is adopted (such as 'Fire Safety London Plan Guidance'). In addition, the Government's system of fire safety gateways requires fire safety information for relevant buildings to be submitted at planning application stage (Gateway 1) which is referred to and assessed by the Health and Safety Executive as part of the planning application process.
Individual	R0517	Other	There's so much empty property in Kennington as is, without the need for more.	There is no evidence to suggest that vacancy rates in the area are higher than in other parts of the borough. Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning

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				applications that come forward for these sites. this includes policies relating to quality and type of housing (including affordable) and the quality of non-residential spaces.
Individual	R0517	Other	Furthermore, the height and bulk of structure will overshadow existing homes, blocking daylight and sunlight, with homes to north, east, and west of the tower most severely affected.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0517	Other	I strongly urge you to vote against. Kennington is a lovely pocket of South London that needs to be valid and protected.	As set out in the introduction to the Draft SADPD and the acknowledged documents for each site, the guiding principle for the draft site allocations is 'design-led optimisation of development capacity'. This is a requirement of London Plan policy – see London Plan policy D3. Local planning authorities are required to consider how best to optimise the development capacity of every site that comes forward for development. The rationale under-pinning the parameters for height and massing in the draft allocation for Site 7 is set out in the acknowledged document for that site, following the principle of design-led optimisation.
Individual	R0522	Other	I am writing to express my concerns regarding the planning policy relating to the above site. The Jewson site should be redeveloped to provide more homes, but the development should be done in such a way that the development fits in with the surrounding neighbourhood and community. The proposal put forward by Lambeth Council doesn't respect the existing neighbourhood and community.	The rationale under-pinning the parameters for height and massing in the draft allocation for Site 18 is set out in the acknowledged document for that site, following the principle of design-led optimisation.

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Individual	R0522	Other	While I have looked at the surveyors extensive report showing how the design will impact site lines from any different vantage points I don't believe there has been enough meaningful consideration of effects on people's homes in Lambeth Council's consultation.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0522	Other	The height and bulk of the proposed tall tower would be almost immediately south of and overshadow existing homes, blocking daylight and sunlight, with homes to north, east, and west of the tower most severely affected.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0522	Other	There is high potential for noise and privacy issues from windows, balconies and terraces close to and overlooking existing homes.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0522	Other	The design is very unsympathetic to the setting of heritage assets including the Grade II Old Fire Station and Grade II Old Court House	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate

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			(Jamyang Buddhist Centre) which would be negatively impacted by a tall tower.	3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0522	Other	A large, bulky, tall building 16 storeys high or higher would have a harmful effect on Conservation Areas including Renfrew Road and Elliot's Row.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0522	Other	The design of recently built residential housing demonstrates that new buildings can be successfully integrated with older heritage buildings - so it is extremely disappointing that including a tall tower completely contradicts this logic and will be against the character of the lower rise surrounding area.	Noted.
Individual	R0522	Other	The tall tower will be outside of the Elephant and Castle tall buildings cluster and therefore stand out.	The 50m identified as suitable on this site is much lower than the 100m+ tall buildings of the Elephant and castle tall buildings cluster.
Individual	R0522	Other	Like the Woodlands proposal, this sets a precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings.	The site specific nature of a site allocation would not set a precedent for other tall buildings. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10 of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Individual	R0522	Other	There will be delivery, servicing, and parking issues for development. The access will be off red route "A" roads at the busy Kennington Lane, Kennington Park Road and Newington Butts junction. Traffic tails back along Kennington Lane as far as Cotton Gardens at peak hours currently.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0522	Other	There should be no access to the development site from Dugard Way which is too narrow.	
Individual	R0522		Tall buildings have poor carbon footprints compared with lower rise buildings in construction materials and methods.	Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and S17 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land), an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an

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				<p>explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building. London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG further require referable applications to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are both strongly encouraged.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>
Individual	R0522	Other	When combined with overshadowing of neighbours' homes, causing them to use more artificial light, and affecting existing sustainable heating systems, the sustainability of the proposed development is likely to be poor.	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0549	Other	I am so against the proposed redevelopment building that has been proposed. The proposed buildings are too tall and not in keeping within the local architecture and the surrounding buildings and people would lose a lot of light. I think the value of the proposed building does not offer any significant value but rather harms what is already there and established.	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the</p>

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				BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0549	Other	If you are going to build it should be harmonious with whats already built and taking into consideration the people living there already. I.e lose of light,	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0549	Other	If you are going to build it should be harmonious with whats already built and taking into consideration the people living there already. I.e privacy and	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R0549	Other	the possibility of lots more traffic from delivery drivers etc. I would be grateful if you would take my comments into consideration and thank you in advance for your consideration in this matter.	<p>In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.</p>
Individual	R0567	Other	Please record and note our objections to Lambeth Council's current high-density proposals for Site 7, and particularly to the multi-storey building at the heart of it. Situated not in the Elephant and Castle tall	<p>The 50m identified as suitable on this site is much lower than the 100m+ tall buildings of the Elephant and castle tall buildings cluster. The locality of the site already has point-block development on the post-war estates.</p>

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			buildings cluster, but instead in a well-established residential area spanning Lambeth and Southwark, this proposed building is both bulkier and much higher than the houses - many with small gardens and very few over five storeys high - that characterise the area, and will be intrusive and incongruous amongst them.	
Individual	R0687	Other	<p>[Part 1]</p> <p>1. I would like to begin by stating that I do not object in principle to the development of the Jewson site and the Wooden Spoon House site. A site such as this with the potential for the provision of new homes should be more intensively used.</p> <p>2. However, I do object strongly to the type and form of the proposals set out in the draft Site Allocations Development Plan Document for the following reasons:</p> <ul style="list-style-type: none"> • Tall building: the proposed development of a tall tower on this site is not current policy and is not in an area identified in the Lambeth Local Plan 2021, or its supporting documents, as a site suitable for a tall tower. A tall tower will be out of character with the rest of the Kennington area. It would have significant effects on the amenity of existing homes, including daylight and sunlight and loss of privacy. It will also completely obscure the views of the Grade II listed Old Fire Station watchtower to the rear, which is one of the elements which marks the building out as having been a fire station. • Inappropriateness of the built form and overdevelopment of the site: the proposed 50m tower is substantially out of scale compared with its immediate context which is 2 to 5 storey buildings. As identified in the appeal for the Woodlands site, Site 7 is also virtually next door to the area designated in the Elephant and Castle Opportunity Area Framework as being suitable for lower rise development. This should be given greater weight in considering proposed uses for Site 7. • Precedent developments: No tower developments currently built in the Elephant and Castle Opportunity Area have had existing homes on their north side in such close proximity to the development site. Homes, and the people in them, to the north, northeast and northwest of Site 7 will be most affected by loss of daylight and sunlight. There are more suitable high density development precedents in the vicinity, including Lambeth Council's own Knight's Walk, 130- 138 Newington Butts (now known as 2 Kennington Lane and 3 Holyoak Road) and Manor Place Depot (which is located within the Elephant and Castle Opportunity Area). • Effects on amenity: the proposed development would have significant effects on existing surrounding homes in terms of loss of daylight and sunlight and loss of privacy. • Heritage: there is likely to be harm to heritage assets both immediately adjacent to the development site and more distant. These harms will be predominantly from the proposed tower and its adjacency to, and effect on, the setting of the Old Fire Station, the Old Courthouse and the 	<p>The glimpse views of the rear of the fire station are only really possible because of the open nature of the Jewson's Yard. Historically the frontage development along Kennington lane would have screened these views. Given this the Council has not considered the loss of these views to be harmful. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site-specific nature of a site allocation would not set a precedent for future tall building development.</p>

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		<p>associated Renfrew Road Conservation Area, and on the Water Tower and the Master's House.</p> <ul style="list-style-type: none"> • Acknowledged presented is misleading: the Acknowledged Report contains a visual at Figure 17. However it shows building shadows from the end of the day, as the sun goes down in the west. This obscures the fact that for much of the day the tall tower would devastate the sunlight and daylight for existing homes to the north and west. The assessment of views also extends this same basic error, with sun shining brightly from the west in the proposed views. Some of the assessment of local views misrepresents the likely effects with the worst, but by no means the only, misrepresentation being the presentation of the likely effects on the view between the Old Courthouse and the Old Fire Station. This assessment shows the tall tower barely visible behind the Old Courthouse when in reality, just a few paces along the road towards Kennington Lane would show the tower to most of its extent in the gap between the Old Courthouse and the Old Fire Station, above the Old Courthouse yard. • Transport and servicing: Access to the proposed development is dismissed in couple of lines in the Acknowledged Report (para 4.3). However this is a site located at the junction of two TfL Red Routes, where traffic regularly backs up along Kennington Lane well beyond the pedestrian crossing and, in peaks particularly, is often queuing northbound well back past Cottington Street. The text states that there is to be no new north south access between Kennington Lane and Dugard Way, but Figure 16 appears to show just that. There can be no substantive access to the development via Dugard Way as the infrastructure is not capable of accommodating it. Based on acknowledged from the "Uncle" development, the number of deliveries per day will be substantial and will need to be accommodated. This does not appear possible along the "lane along the western side of the site" (para 4.3) which, in the absence of any detail is assumed to be the one currently providing the only access to the front door of number 34A Kennington Lane. • Lack of realistic development considerations: Many of the "asks" within the Acknowledged Report would affect the viability of the site and would push the development of a tall tower even higher to achieve developer returns: <ul style="list-style-type: none"> - requiring the reprovion of an element of light industrial floorspace will affect the viability of the site and push developers to a taller building to make what they consider a realistic return - the inclusion of a "public square" will reduce significantly the developable area and likewise push the tower higher - the inclusion of basement parking and servicing would also substantially increase build cost and push the tower even higher to recover the cost. • Lack of detailed study: This proposal has been put forward in with no 	
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			<p>detailed consideration of the potential effects of a tall building on this site. There are likely to be significant effects on amenity, on daylight and sunlight and on heritage assets (listed building and conservation area). Whilst the latter is acknowledged in the consultation material, no detailed study appears to have been undertaken. The potential for effects on amenity of neighbouring homes is barely mentioned at all. In a dense urban areas such as this, these effects could be significant. The conclusion of the Acknowledged Report claims that the indicated approach has been “tested at the level of general massing and height to ensure acceptable impacts in relation to daylight and sunlight...” but there is no acknowledgment presented that this has been the case. Proposing a tall tower which, if this policy is approved will effectively be “baked in” to the plans for the site, is reckless without that more detailed study of the likely effects on people's homes and lives.</p> <ul style="list-style-type: none"> • Sustainability issues: tall buildings have poor embodied carbon footprints compared with lower rise buildings. There are particular issues for tall buildings associated with embodied carbon in building materials and in the construction methods. When combined with overshadowing of neighbours' homes, causing them to use more artificial light, and affecting existing sustainable heating systems, causing them to use more energy to heat their homes, the sustainability of the proposed development is likely to be poor. <p>3. The reasons underpinning my summary points above are set out in more detail in the remainder of this letter.</p>	
Individual	R0687	Other	<p>4. Additionally, there are a significant number of errors and inconsistencies throughout the documents – I have drawn attention to these in the body of my objection where these errors and inconsistencies cause difficulties understanding the proposals or they lead to incorrect or inaccurate results or conclusions in assessments.</p>	Matters raised have been responded to individually. The acknowledged report has been revised in places.

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Individual	R0687	Other	<p>Planning Policy</p> <p>5. The Acknowledged Report make several references to the Elephant and Castle Opportunity Area Planning Framework (2012) (E&C OAPF) and to the Pullens character area which covers the area of Southwark immediately next to the Lambeth boundary.</p> <p>6. As the barrister acting for the residents in the appeal on the Woodlands site, which is immediately to the north of the Water Tower development (Appeal Decision APP/N5560/W/20/3248960) identified to the Inspector, within the Elephant and Castle Opportunity Area Planning Framework (2012) (E&C OAPF), the extents of Holyoak Road, the north side of Longville Road and Dante Road to its junction with Brook Drive, including the student residences on the east side, but excluding the Uncle building, are covered by the Pullens character area (section 5.6). Under E&C OAPF Policy SPD 43: Built form and the public realm, within the Pullens character area,</p> <p>“development should :</p> <ul style="list-style-type: none"> - Conserve or enhance the significance of the Pullens estate conservation and its setting area by: - Maintaining the established or historic building line. - Relating to existing building heights which are generally 4 storeys. - Ensuring that the form, massing and plot widths of development reflects the historic character”. <p>7. The Inspector for the Woodlands appeal accepted this (appeal decision, paragraph 28) and noted that this OAPF policy was relevant to the appeal site as it seeks to maintain the low rise character of the area immediately adjacent to the site of the proposed development. Due to this low rise policy in the OAPF, as referenced in paragraph 28 of the appeal decision, the proposed tall tower on the Woodlands site would be set well apart from the developing cluster in the Elephant and Castle Opportunity Area and would be a standalone feature. As identified by the Inspector in the appeal decision for the Woodlands site, in views from the south-east, north and north-west, from within the Pullens Character Area, and from the south and south-west within Lambeth, a tall tower “would be set well apart from the developing cluster and would be a standalone feature. As the cluster of tall buildings increases in density and expands the incongruity of the proposed tower would only increase” (paragraph 28 of the appeal decision). This assessment of the incongruity of a tall tower away from the Elephant and Castle cluster applies as much to the Lambeth SADPD proposal for a tall tower on Site 7, which is immediately to the south of the Water Tower development, as it did to the 29 storey tower subject of the appeal, the site of which is immediately to the north of the Water Tower development. It is noted that the consultation documentation, including the Acknowledged Report, identifies this policy constraint but Lambeth is still proposing a tall tower on Site 7.</p> <p>8. The Inspector also noted in paragraph 29 of the appeal decision that</p>	
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			<p>"There is a cluster of three 23 storey buildings at Cotton Gardens Estate on Kennington Lane about 250 metres to the south-west of the site. This scheme contributed to post-war reconstruction and was completed in 1968. Neither this scheme nor other individual tall buildings in the city establishes a precedent for the proposed 29 storey tower on the Woodlands Nursing Home site". Again this applies equally to Site 7.</p>	
Individual	R0687	Other	<p>9. Nowhere in the supporting information for the Local Plan 2021, including TP 08 Topic Paper 8: Tall buildings, 2019, B 82 Lambeth Tall Buildings Study, 2014 and EB 84 Vauxhall & Albert Embankment Tall Buildings Assessment, 2018, all of which supported the Local Plan 2021 is anywhere other than Waterloo, Vauxhall and Brixton identified as locations suitable for tall buildings.</p>	<p>Site Allocation policy documents like this one are an accepted means by which to identify locations suitable for tall buildings.</p>
Individual	R0687	Other	<p>10. Annex 10 of the Lambeth Local Plan 2021 contains maps showing locations appropriate for tall building, in Waterloo, Vauxhall and Brixton. Kennington is not identified as being suitable for tall buildings. As discussed below, the character of the area of Kennington around Site 7 is not one that would support a tall building and the SADPD lacks a "convincing justification" and does not "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)". The text in italics is the test set by Lambeth Local Plan policy Q26 which does not seem to have been applied to the Council's own draft DPD.</p>	<p>Site allocations documents such as this are an accepted means of identifying tall building locations through the planning process.</p>
Individual	R0687	Other	<p>Principle of acceptability of harm to people and their homes</p> <p>11. In the absence of any acknowledged to the contrary, and certainly in the absence of any meaningful or detailed study of the likely effects of the proposals for Site 7 on the amenity of people in existing homes surrounding the site, the premise of the proposals in the SADPD appear to be that proposal will generate harm to adjacent residential amenity but that this harm is acceptable. However, the DPD documents barely acknowledge that in those adjacent residential properties, there live people, whose homes the adjacent residential amenity relates to. It is therefore the people who live in these homes who will experience the harm.</p> <p>12. The NPPF does not mention that development can be considered through balancing harm to residential amenity. Indeed the only reference to 'harm' in the main body of the NPPF that is not in the context of heritage assets or green belt is in paragraph 71 in the context of assessing windfall sites which says that "Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area".</p> <p>13. Likewise the London Plan 2021 provides references to 'harm' only in the context of heritage, green belt, view management and aviation development. Policy D3 - Optimising site capacity through the design-</p>	<p>Matters raised have been responded individually. The acknowledged report has been revised in places.</p>

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			led approach states that “D Development proposals should:... 7) deliver appropriate outlook, privacy and amenity”. There is however no indication that ‘harm’ caused by development to people and their homes is acceptable at all or that such harms can be traded in return for new development.14. Lambeth Plan 2021 Policy Q2 – Amenity sets out, for general development, the criteria within which a development would be supported but the policy doesn’t indicate that harm to existing residential amenity (i.e. harm to people and to their homes) is something that can be traded in return for development.	
Individual	R0687	Other	Acceptability of proposal Site context 15. I consider that the context of the development site is particularly important. The site is surrounded by lower rise development, immediately adjacent to Grade II listed buildings (The Old Fire Station and the Old Courthouse), and located adjacent to a conservation area (Renfrew Road Conservation Area). The impacts on heritage assets are likely to cause a high magnitude of less than substantial harm.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0687	Other	The impacts of the proposed development will include increased overshadowing, loss of daylight and sunlight, loss of privacy, increased overlooking of existing homes. The Site 7 proposal is shoehorning in an over development of the site which is very constrained by existing homes, and has poor access. Whilst in principle I am in favour of housing development at this location, the Council has not demonstrated that the impacts on neighbouring homes justify the proposed development, the densities proposed or the tall building.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The ‘Neighbouring relationships’ part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 ‘Optimising site capacity through the design-led approach’ and D6 ‘Housing quality and standards’) and the Lambeth Local Plan (policy Q2 ‘Amenity’ and H5 ‘Housing standards’). The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The ‘Neighbouring relationships’ part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE’s publication: ‘Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))’ and assessed against relevant policies of the London Plan (D3 ‘Optimising site capacity through the design-led approach’ and D6 ‘Housing quality and standards’), Lambeth Local Plan (policy Q2 ‘Amenity’ and H5 ‘Housing standards’) and other relevant guidance. Where relevant, this would include assessment of loss of

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				radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0687	Other	16. The Acknowledged Report references the Cottington Close buildings (NB not Cottingham as repeatedly incorrectly referenced in consultation material) on the south side of Kennington Lane which are 10 storeys and the Cotton Gardens estate which are higher. However, these are outliers in Kennington and, as the Inspector set out in paragraph 29 of his decision on the appeal scheme: "There is a cluster of three 23 storey buildings at Cotton Gardens Estate on Kennington Lane about 250 metres to the south-west of the site. This scheme contributed to post-war reconstruction and was completed in 1968. Neither this scheme nor other individual tall buildings in the city establishes a precedent for the proposed 29 storey tower on the Woodlands Nursing Home site". The same approach should therefore be taken for Site 7.	Accepted. The typographical error has been corrected.
Individual	R0687	Other	18. As also set out in the precedent section below, the taller developments in Kennington, and the ones currently extant in the Elephant and Castle Opportunity Area are all set back from neighbouring properties to the north, either by being in parkland settings, or by other development or significant road junctions, thus mitigating to some extent their impacts on the existing amenity of people and their homes.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0687	Other	Inappropriateness of built form 19. Site 7 is not one identified in any development plan policy or document as being suitable for tall buildings. It is not in a designated area such as Central Activities Zone or the Elephant and Castle Opportunity Area, neither is it in a designated area of intensification or a town centre. Therefore, there are no designations in place to suggest the site is suitable for a tall building. Site 7 is not a site identified as suitable for tall buildings and as set out elsewhere in this letter has significant adverse effects on the existing community around it.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10 of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Individual	R0687	Other	20. As set out above, the site is not within the "central" area as defined in the London Plan. The site of the proposed development is defined as having a PTAL rating of 6b. I recognise that this type of location is	Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at

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			suitable for high density development. However, whilst London Plan 2021 Policy GG2 Making the best use of land seeks to promote “higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”, paragraph 3.9.1 of the London Plan 2021 states that “...high density does not need to imply high rise...”.	least 1,335 net additional dwellings to be completed every year during the ten year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor’s London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use.
Individual	R0687	Other	21. Further the London Plan in paragraph 3.9.3 defines “Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline” it also says that “Boroughs should define what is a ‘tall building’ for specific localities” and that once tall is defined, “This does not mean that all buildings up to this [Borough defined] height are automatically acceptable, such proposals will still need to be assessed in the context of other planning policies, by the boroughs in the usual way, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area”.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10 of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.
Individual	R0687	Other	22. The proposal for Site 7 is a 50m tower squeezed onto a very constrained site in amongst lower rise (2 to 6 storey) properties. It is seeking to cram in as many units as possible, along with retaining light industrial floorspace into a small, cramped and constrained site and clearly does not have any regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass. The proposal is about as far from human scale in the immediate context as one can get. The proposed development pays no respect to the existing lower rise context, nor to the proximity of existing homes, the character and grain of the area, or the physical context of the site. This would be contrary to policy D3 of the London Plan 2021 and policies H1 and Q5 of the Lambeth Local Plan 2021.	Noted.
Individual	R0687	Other	23. The built form of the proposed development is overbearing compared to the immediate lower rise surroundings.	The indicative approach has been revisited. Officers do not agree that an overbearing effect results.
Individual	R0687	Other	It is immediately south of many existing homes, which would suffer the consequences of increased overshadowing and loss of daylight and sunlight	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The ‘Neighbouring relationships’ part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE’s publication: ‘Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))’ and assessed against relevant policies of the London Plan (D3 ‘Optimising site capacity through the design-led

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				approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0687	Other	whilst still more homes would also suffer from loss of privacy, and increased overlooking.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0687	Other	The bulk, scale, height and massing are completely at odds with the existing nature of the area. The proposed development is a 50m storey tower squeezed onto a very constrained site immediately amongst lower rise (2 to 6 storey) properties. It is seeking to cram in as many units as possible into a small, cramped and constrained site and clearly is not respecting local distinctiveness.	The built character of Kennington Lane is varied and includes nearby point blocks at Cottington Close Estate and at Cotton gardens
Individual	R0687	Other	24. The proposal has no relationship to existing urban block and grain or patterns of space and relationship and will be massively prominent in a lower rise area – it would be nearly double the height of the highest Cottington Close buildings. The proposal by Lambeth Council pays no respect to and does not adequately preserve or enhance and the existing prevailing local character which is lower rise and urban in nature. The proposal is of a city centre type development which is inappropriate in such a small site, surrounded by other homes which are much smaller in scale.	The nearest Cottington Close buildings are not the tallest on that estate.
Individual	R0687	Other	25. The proposal would pay no respect to the existing homes in the area and their function as 'home as a place of retreat'. This is contrary to policy D3 of the London Plan 2021 and policies H1 and Q5 of the Lambeth Local Plan 2021, Article 8 of Schedule 1, Part 1 of the Human Rights Act 1998, Right to respect for private and family life and Article 1 of Schedule 1 Part 2 of the same Act, Protection of property which states that "Every natural or legal person is entitled to the peaceful enjoyment of his possessions".	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0687	Other	26. The Site 7 proposal will lead to a significant reduction in the quality of the amenity environment for people living in homes around the site. The proposed development will not interface in any meaningful way with	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for

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			<p>surrounding land. As set out above the development will cause detriment to existing residents ability to live healthy lives, affecting the health and well-being of residents of existing homes in the area. Impacts include increased overshadowing, loss of daylight and sunlight, loss of privacy, increased overlooking. These have the potential to cause increasing stress levels for residents of existing homes.</p>	<p>inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0687	Other	<p>The proposals is likely to be predominantly small flats which will add to and entrench a feeling of transience in the area, rather than promoting community diversity, inclusion and cohesion. Ironically the proposed developments here and at the Woodlands site have engendered significant community spirit and inclusion in the community seeking to oppose the type of developments proposed.</p>	<p>The mix of homes will be fully considered at the time a planning application is brought forward on the site. Local Plan Policy H4 will apply, which acknowledges the need for family accommodation, in particular family-sized affordable homes.</p>
Individual	R0687	Other	<p>The Site 7 proposal will significantly erode existing residents' sense of place, safety and security.</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>

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Individual	R0687	Other	The design of the building will do nothing to reinforce or enhance the existing lower rise character of the neighbourhood.	The character of the locality is varied with point blocks at Cotton gardens and Cottington Close Estate.
Individual	R0687	Other	27. The Site 7 proposal has not sought to reflect and “understand what is valued about existing places” nor does it strengthen “London’s distinct and varied character” (London Plan Policy GG2). Instead the Site 7 proposal runs roughshod over the local lower rise character of the area, trying to squeeze a large footprint development into too small a space. It will place an unacceptable burden on poor access points.	The character of the locality is varied with point blocks at Cotton gardens and Cottington Close Estate. Vehicular access is only being proposed to be from Kennington Lane
Individual	R0687	Other	<p>Precedent development</p> <p>28. The proposed development site is not in the opportunity area. The text below emphasises the distance from existing tall towers to the nearest residential properties to the north as placing a tower south of residential properties has the most potential to disrupt daylight and sunlight.</p> <p>The more distant a tall tower is from other homes and amenity areas, the less time a tower will obscure sunlight from those other homes and amenity areas.</p> <p>29. The tall tower known as ‘Uncle’ is located within the Elephant and Castle Opportunity Area and the Central Activities Zone. It is on the site of a former 7 to 9 storey building, Rowton House, latterly the London Park Hotel, which was large in footprint and bulky in nature. The site has student flats to the west and south and the ‘Uncle’ tower is significantly distant from what was the nearest existing residential property located 100 m to the north on Longville Road.</p> <p>30. The tall tower ‘One the Elephant’ is immediately to the south of the Metropolitan Tabernacle, east of the Castle leisure centre and is adjacent to St Mary’s Churchyard and thus the nearest existing residential property to north is 195 m away (Perronet House).</p> <p>31. The tower ‘Strata’ is immediately to the south of the Walworth Road (A215) and the Elephant and Castle Shopping Centre, whilst it is close to Draper House, the nearest existing residential property to the north is 228 m (Fleming House).</p> <p>32. Cotton Gardens was completed 1968 and included as part of the design a significant area of open space around it, along with the very low rise properties on Knight’s Walk. The nearest residential properties to the north is 43 m (Vanbrugh House and Sheridan House) which were completed in the 1970s, post-dating Cotton Gardens. Also, as identified in paragraph 16 above, the Inspector in the Woodlands site appeal dismissed Cotton Gardens as a precedent for current development.</p> <p>33. Thus, unlike the proposed development precedent tower development is on larger sites, significantly distant from any existing residential properties to the north of the towers which could be affected by loss of daylight and sunlight.</p> <p>34. A tall tower on Site 7 would be around 30m to the south of existing homes at the Water Tower development and much less than that from</p>	Noted.

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			the Old Fire Station. These are homes which will be significantly adversely affected by changes in daylight and sunlight.	
Individual	R0687	Other	<p>Recent lower rise precedents</p> <p>35. The Site 7 site is approximately 0.65 hectares. The draft DPD policy indicates a target of 135 to 145 self-contained residential units. The following assessment is based on those figures.</p> <p>36. As set out in paragraph 5 above, it has been clearly identified in the appeal for the Woodlands site (Appeal Decision APP/N5560/W/20/3248960, paragraph 28), that the area immediately to the east of the appeal site within the London Borough of Southwark sits in a part of the OAPF that “does not support the development of tall buildings” as it is within the Pullens Character Area and that the tall buildings within the OAPF that are either built, under construction or approved are predominantly in the Central and Heygate Street Character Areas of the OAPF.</p>	Noted.
Individual	R0687	Other	<p>37. More relevant precedent of lower rise but still dense developments are the developments, in the London Borough of Lambeth, at Knight’s Walk and 130-138 Newington Butts and, in the London Borough of Southwark, The Manor Place Depot development.</p> <p>38. The development in Knight’s Walk (17/05992/RG3, approved in 2019), the first phase of which has been recently completed, is immediately opposite the junction between Dugard Way Renfrew Road, is a Homes for Lambeth development of 84 residential flats in blocks of up to 7 storeys, with associated parking, landscaping, access and ancillary works on a site of 0.39 ha, although it should be noted that the site is adjacent to an existing medium rise building in the form of the Gilmour Section House (see Figure 1).</p> <p>39. The ratio of residential units to site area would appear to demonstrate a lower rise scheme accommodating the target number of residential units would be possible on Site 7. [Photo] Figure 1: Knight’s Walk development for Homes for Lambeth is a good example of the type of low rise but dense development that could be achieved on the Woodlands site.</p> <p>Figure 1 is taken looking from the location of gates on Dugard Way. The narrow road access via Dugard Way to the application site due to the parking bays on both sides of Dugard Way should also be noted.</p> <p>40. The development at 130-138 Newington Butts (12/00054/FUL), now known as 2 Kennington Lane and 3 Holyoak Road, consists of 73 residential units together with the ground floor gym use on a 0.23 ha site fronting Newington Butts, immediately adjacent to Site 7. The site also backs on to the Water Tower development and existing low rise properties on Holyoak Road. The development steps back in height from 6 storeys on the main road to 5 storeys opposite the Water Tower development, with two 3-storey townhouses at the most immediate interface with the two storey homes on Holyoak Road (see Figures 2 and 3). This development has a 32m separation distance between it and the existing Water Tower development homes.</p>	Noted.

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Individual	R0687	Other	<p>41. The ratio of residential units to site area would appear to demonstrate a lower rise scheme accommodating the target number of residential units would be possible on Site 7. [2 Photos]</p> <p>Figures 2 and 3: Two views of the 130-138 Newington Butts development, SE11, located within Lambeth and immediately adjacent to the Water Tower development (figure 2 is the elevation fronting A3 Newington Butts and Figure 3 is the elevation fronting Holyoak Road. This is another good example of the type of low rise but dense development that could be achieved on the Woodlands site (and includes two town houses on the right of the picture)</p>	Noted.
Individual	R0687	Other	<p>42. The Manor Place Depot development (Figure 4) in the London Borough of Southwark (15/AP/1062, approved in 2016) is approximately 600m to the southeast of the Woodlands site and is located within the Elephant and Castle Opportunity Area. The site is located in an “urban” area similar in nature to Site 7 in that it has a mix of two storey houses, some 4 to 5 storey buildings, including the Pullens estate referenced in the E&C OAPF policy quoted in paragraph 5 above, and some higher buildings of between 8 and 10 storeys in the vicinity.</p> <p>43. The Manor Place Depot development also contains two Grade II listed buildings including 17-21 Manor Place (former Coroner’s Court) and Manor Place baths buildings. The Manor Place Depot development consists of 270 residential units over approximately 1.7 ha, giving a density of 613 habitable rooms per hectare (compared to the 571 hr/ha if the Master’s House is included in the site area or 784 hr/ha if the Master’s House is excluded, as it should be), whilst still providing a significant amount of useable amenity space. However, unlike the Lambeth proposal for Site 7, the buildings only range from 2 to 7 storeys in height, and are sympathetic to the existing listed buildings on site, reusing them, and, in the case of the former Coroner’s Court, fully integrating it into the development, whilst not over-powering these listed buildings.</p> <p>44. The ratio of residential units to site area would appear to demonstrate a lower rise scheme accommodating the target number of residential units would be possible on Site 7. [Photo]</p> <p>Figure 4: Manor Place Depot development, Occupation Road, SE17, located within the Elephant and Castle OAPF policy area and yet another good example of the type of low rise but dense development that could be achieved on this site</p> <p>Effects on amenity for existing residents</p>	<p>The Site Allocation policy sets out the parameters for development of the site, based on high-level testing of the optimum development capacity that could in principle be accommodated on the site, using a design-led approach in accordance with London Plan Policies D1B(3) and D3. Applicants and their architects will need to undertake a further detailed assessment of site capacity when designing proposals for submission as a planning application, informed by the parameters set out in the site allocation policies and other relevant policies in the development plan. Developments on other sites and in other boroughs are not considered to be relevant.</p>
Individual	R0687	Other	<p>Loss of privacy</p> <p>45. There are a number of flats in the Goddard House and Limelight House blocks at the Water Tower development that are single aspect facing the Jewson and Wooden Spoon House site which is south of the Water Tower development. Homes in Goddard House and Limelight House are between 7 and 9 m from the Wooden Spoon House site.</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The ‘Neighbouring relationships’ part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed</p>

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				development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0687	Other	<p>46. As a resident of [redacted] I look partially across the Wooden Spoon House car park towards the homes in the 3 Holyoak Road block. There is a 32m separation distance between 3 Holyoak Road and those of us in homes in the existing Water Tower development. Even so, it is quite easy to see into people's homes, to see the occupants moving around, to see what they are doing. I assume the reverse is possible.</p> <p>47. Whilst that distance is 32m, the proposals in the Acknowledged Report state in 2.28 that there should be the "Creation of enclosed, defensible, residential frontage to Dugard Way". In paragraph 4.2 the Acknowledged Report concedes that there should be "approximately" 20m distance from the Dugard Way neighbours to the north (notably this is less than the 21m conventionally used in such cases). However, if I can clearly see neighbours 32m away, having properties 50% closer will massively increase the overlooking issue for all parties.</p> <p>48. I do not want to have to have my curtains closed 24 hours a day, and I doubt any new neighbours would either, so why a design that creates this issue? Unless the properties on Dugard Way are also set back 32m, in order to protect the residential amenity of people in their existing homes, the properties at the northern end Site 7 should only present a flank wall to Dugard Way, or at most should have circulation space or non-habitable rooms on the Dugard Way frontage, with the properties perpendicular in layout to Dugard Way.</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R0687	Other	<p>[Part 2]</p> <p>Daylight, Sunlight and overshadowing</p> <p>49. No detailed study appears to have been undertaken to support the Site 7 proposals, which I consider a significant omission in such a dense urban area. London Borough of Lambeth needs to be aware of and to have fully considered the likely effects of the proposals it is putting forward before those proposals are "baked in" to planning policy.</p>	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant</p>

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				guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0687	Acknowledged	50. Figure 17 is placed next to the brief daylight and sunlight section. It disingenuously shows shadows from right at the end of the day, as the sun goes down in the west. This obscures the fact that for much of the day the proposed tall tower placed to the south and east of existing homes would devastate the sunlight and daylight for those existing homes to the north (Water Tower development) and west (Old Fire Station). The assessment of views also extends this same basic error, showing the sun shining brightly but coming directly from the west.	The images in acknowledged relating to heritage matters are not daylight and sunlight assessments. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0687	Acknowledged	51. The Acknowledged Report is incredibly weak in that it says that proposals should be generally consistent with inner urban and urban locations for sunlight and daylight effects. From experience with the Woodlands applications, we know that complete loss of sunlight and	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in

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			substantial loss of daylight would be represented as being "generally consistent" and Lambeth and the GLA would accept this. ⁵² It is clear from extrapolating the results of daylight and sunlight reports undertaken for the Woodlands site that properties on Renfrew Road and Dugard Way (including Goddard House and Limelight House), are likely to lose very significant amounts of sunlight should a tall tower be included in Site 7, particularly in the winter months when solar gain is most needed to supplement ever growing heating bills. ⁵³ In seeking to be environmentally sustainable, the Water Tower development blocks have a heating system (Nilan VP 18) that is based on heating using heat recovery from ambient heat, including, where it is possible, solar heating. In winter when the heating is needed most, the sun is low in the sky and only provides heat for part of the day as it is. Any tall building on the Jewson site will further block the sun in winter when it is most needed. This will be a particular issue for the residents of Limelight House which is mostly social rent accommodation but will also affect Goddard House and, could affect other flats on the development. 54. For the residents of Limelight House particularly, the loss of winter sunlight will have a significant effect on their ability to heat their homes efficiently, without resorting to expensive electric heaters. I presume Lambeth council isn't going to pay the additional heating bills?	particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0687	acknowledged	55. The likely adverse effects of the Site 7 proposal on daylight and sunlight of existing homes in the vicinity are likely to be contrary to policy, in particular London Plan 2021 policy D6, Lambeth Local Plan 2021 policy Q2 and Kennington Oval and Vauxhall Neighbourhood Plan Draft for Consultation, March 2018 policy KOV11.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0687	acknowledged	56. More generally the proposal will affect the health and well-being of residents of existing homes in the area. Impacts include increased overshadowing, loss of daylight and sunlight, loss of privacy, increased overlooking. These have the potential to cause increasing stress levels for residents of existing homes and would thus be contrary to London Plan 2021 Policy GG3.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential

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				<p>accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R0687	acknowledged	<p>57. There is nothing about protection of existing residential amenity in the conclusion of the Acknowledged Report which sets out recommendations to be included in the site allocation policy. This does not give residents of existing homes the comfort that the effects of a development proposed through the SPD would take any account of the effects it may have on their homes.</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R0687	Acknowledged	<p>Heritage & townscape Heritage</p> <p>58. No detailed study of heritage impacts appears to have been undertaken to support the indicative design being put forward for Site 7. However, there is likely to be harm to heritage assets both immediately adjacent to the development site and more distant. These harms will be predominantly from the proposed tower and its adjacency to, and effect on, the setting of the Old Fire Station, the Old Courthouse and the</p>	<p>The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.</p>

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			associated conservation area, and on the Water Tower and the Master's House.59. The Old Fire station is Grade II listed and the Historic England listing description states: "This is a rare example of a fire station of 1868 in London, given added interest by its recasting with a fine Jacobean-style centrepiece and tower. It is a distinctive, strong example of a London fire station. It also forms a strong group with the adjoining former court house".	
Individual	R0687	Acknowledged	60. The watchtower is still, after more than 150 years, a distinctive feature on the rear of the Old Fire Station building, visible clearly on the skyline from Renfrew Road, from Dugard Way and from Kennington Lane. At a proposed 50m height, the tall tower proposed for Site 7 would be approximately 5 times as high as the Old Fire Station watchtower. As demonstrated in the assessment of TVIA view 12 in Appendix 1 of the Acknowledged Report, the tower is not visible from the front of the building and therefore will no longer be visible except perhaps in very oblique views	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0687	Acknowledged	61. The Historic England listing description for the Grade II listed Old Courthouse, states that "This is the earliest surviving example of a Criminal Magistrates Court in the Metropolitan area".	Noted
Individual	R0687	Acknowledged	62. Both the Old Fire Station and the Old Courthouse form part of the Renfrew Road conservation area.	Noted
Individual	R0687	Acknowledged	63. The likely visual effect of the proposals for Site 7 is presented in "TVIA view 11 Renfrew Road – opposite no. 42 Renfrew Road". The assessment of this local view misrepresents the likely effects on the view between the Old Courthouse and the Old Fire Station. This viewpoint appears to be intended to represent the view of the Site 7 proposal in the context of the Renfrew Road Conservation Area. However this assessment shows the tall tower barely visible behind the Old Court House. In reality, anyone taking a few paces along Renfrew Road towards Kennington Lane would see the tower to most of its extent filling the gap between the Old Courthouse and the Old Fire Station, with the proposed tower being very visible above the Old Courthouse yard.	The view locations have been revisited in the revised acknowledged document.
Individual	R0687	Acknowledged	64. The assessment for this viewpoint states that there will be "No heritage or townscape harm". This, in my view, seriously misrepresents the level of harm that will accrue from the type of development indicated for this site, likely to be a high magnitude of 'less than substantial harm'. A suggested location for a reassessment of the potential effects on the Old Fire Station, the Old Courthouse and the Renfrew Road Conservation Area is shown in Figure 5. [Photo] Figure 5: Suggested more representative location for the assessment of effects on the Renfrew Road Conservation Area.	The view locations have been revisited in the revised acknowledged document.
Individual	R0687	Acknowledged	65. Whilst a view from Dugard Way from north of the Grade II Master's House is not assessed, "TVIA view 9 Dugard Way" provides an indication that the tall tower is likely to be visible in the backdrop to the views of the façade of the Master's House.	The view locations have been revisited in the revised acknowledged document.

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Individual	R0687	Acknowledged	66. "TVIA view 13 Dante Road / Longfield Road" (NB this should refer to Longville Road) seems to have been taken at one of the very few angles that the Grade II listed Water Tower does not appear above the Dante Road houses. The view assessed should be the one in Figure 6 below which shows the Water Tower as the only building breaking the skyline. On the basis of the selective view, the assessment of "No townscape harm" is simply not credible. A suggested location for a reassessment of the potential effects on the Water Tower and Dante Road is shown in Figure 6. [Photo]	The view locations have been revisited in the revised acknowledged document.
Individual	R0687	Acknowledged	Figure 6 – view from the junction of Dante Road and Longville Road that should be reassessed in place of the TVIA view 13 in the Acknowledged Report.	The view locations have been revisited in the revised acknowledged document.
Individual	R0687	Acknowledged	67. Given the apparent harm that to heritage assets the proposed development would cause, this would appear to be contrary to the NPPF para 199 which requires London Borough of Lambeth to place great weight on the assets' conservation and NPPF para 200 that any harm (including harm to settings) requires "clear and convincing justification". I do not consider that there is a clear and convincing justification for the harm to the significance of heritage assets that results from the scheme as proposed for Site 7. The proposal is also therefore contrary to policy HC1 in the London Plan 2021 and Lambeth Local Plan 2021 policies Q20, Q22 and Q23.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0687	Acknowledged	68. Notwithstanding the apparent issue with the direction of the sunlight shown on the views, "TVIA view 9 Dugard Way" is incorrectly located in the location map and shown as being taken between Goddard House and Limelight House, when in fact it is from between Limelight House and numbers 2 and 3 Dugard Way.	Accepted.
Individual	R0687	Acknowledged	69. The view appears to narrow the actual vista along this part of Dugard Way. It is also taken slightly too far back to see the full effect of the tall tower. It is suggested that this location is also reassessed with a more representative view of the proposals set out in the Site 7 documentation. The assessment of this location also implies that views of trees would remain. One of these trees is in the playground for Wooden Spoon House and is likely to be removed for any development. The other is so distant in the grounds of Cottington Close that that it will almost certainly be obscured by any development. 70. Given the above issues, basing the heritage and townscape assessment of the proposals on what is presented in the Acknowledged Report would not appear appropriate.	The view locations have been revisited in the revised acknowledged document.
Individual	R0687	Acknowledged	71. Access to the proposed development is dismissed in couple of lines in the Acknowledged Report (para 4.3). However this is a site located at the junction of two TfL Red Routes, one of which, Kennington Lane, is the ring round boundary of the Congestion Charge zone. As can be seen from a review of the "typical traffic" layer on Google maps, traffic regularly backs up along Kennington Lane beyond the pedestrian crossing and, in peaks particularly, is often queuing northbound well	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use. Re the reference to access at para 4.3 of the Acknowledged Report -

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			back past Cottington Street.72. It is considered that gaining access to the site for a significantly more intensive development that currently on the site has the potential to cause substantial issues at this important road junction.	Acknowledged Report should be amended e.g. Fig 1 red line doesn't include the "lane along the western side of the site"
Individual	R0687	Acknowledged	73. The text in the Acknowledged Report states that there is to be no new north south access between Kennington Lane and Dugard Way (paragraph 3.1, point F), but Figure 16 appears to show just that, or at least it doesn't show that such an access is prevented.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Re the reference to access at para 4.3 of the Acknowledged Report - Acknowledged Report should be amended e.g. Fig 1 red line doesn't include the "lane along the western side of the site"
Individual	R0687	Acknowledged	74. There should be no substantive access to the Site 7 development via Dugard Way. The infrastructure of Dugard Way is simply not capable of accommodating it. There will also be a development at the Woodlands site at some point, which is likely to be using the Dugard Way access, at least in part.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Re the reference to access at para 4.3 of the Acknowledged Report - Acknowledged Report should be amended e.g. Fig 1 red line doesn't include the "lane along the western side of the site"
Individual	R0687	Acknowledged	75. Anecdotally I understand that the 'Uncle' development (343 units compared to the 135 to 145 proposed for Site 7) gets at least 200 deliveries per day, and often more. This is considerably more than the developer of the Uncle scheme anticipated and would equate to around 100 deliveries per day for the proposed development. During a survey undertaken over 30 minutes on Monday 29 November 2021, between 1315 and 1345 a total of 7 delivery vehicles arrived via Dugard Way to service the existing Water Tower development (of 112 units). Extrapolating that would equate to 14 deliveries per hour.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use. Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected levels of servicing.
Individual	R0687	Acknowledged	76. Based on acknowledged from the "Uncle" development, the number of deliveries per day will be substantial and need to be accommodated. This does not appear possible along the "lane along the western side of the site" (para 4.3) which, in the absence of any detail is assumed to be the one currently providing the only access to the front door of number 34A Kennington Lane.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected levels of servicing. Re the reference to access at para 4.3 of the Acknowledged Report - Acknowledged Report should be amended e.g. Fig 1 red line doesn't include the "lane along the western side of the site"
Individual	R0687	Acknowledged	77. It is assumed in the Acknowledged Report (paragraph 4.3) car parking and servicing would be undertaken from a basement. However this would substantially increase build cost and push the tall tower even higher to cover the cost.	Re the reference to access at para 4.3 of the Acknowledged Report - Acknowledged Report should be amended e.g. Fig 1 red line doesn't include the "lane along the western side of the site"
Individual	R0687	Acknowledged	78. Any increase in traffic on Dugard Way is a potential risk to the safety of existing pedestrian and cyclist users of the Dugard Way entrance who currently benefit from a segregated route through the Water Tower development.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.
Individual	R0687	Acknowledged	79. The narrow gates on Dugard Way form part of the Water Tower development demise and are regularly damaged by vehicles, requiring expensive repairs which residents of the Water Tower development have to pay for in their service charge. Additional use of the narrow	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.

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			gates for accessing the proposed development has the potential to exacerbate this. The road between the gates and Renfrew Road is also narrow with parking on both sides (as shown in Figure 1 above, taken on a quiet day between Christmas and New Year 2021). The junction onto Renfrew Road, has poor visibility to the left, towards Kennington Lane and there is parking on both sides, further reducing visibility. The use of Dugard Way for access to the development is therefore not suitable.	
Individual	R0687	Other	<p>Sustainability</p> <p>80. Embodied energy contained in the building's structural materials and the energy consumed during the construction process need to be considered. Tim Snelson of Arup has calculated that the average skyscraper will have double the carbon footprint of a lower building of equivalent square footage. A tall building is more structurally challenging to build, requiring deeper foundations - especially when built on London clay - and greater rigidity for stability, to prevent sway. All of this requires extra materials, which add to the building's embodied energy. The suggested basement for parking and servicing would further increase the embodied energy.⁸¹ As set out by Aecom in the article 'To meet net zero carbon targets, we may need to rethink building height and mass'[https://aecom.com/without-limits/article/to-meet-net-zero-carbon-targets-we-may-need-to-rethink-building-height-and-mass/] , "Embodied carbon typically rises with building height and taller buildings generally need more carbon-intensive materials to support the weight, to resist wind loadings, and to meet current fire regulations. This reduces the potential to use timber products and lighter-weight raft/pad foundations. Basements are particularly carbon-intensive as it is virtually impossible to avoid pouring tonnes of concrete to construct them to meet strict design criteria imposed by warranty providers".</p>	<p>There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy. Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land), an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building. London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG further require referable applications to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are both strongly encouraged. In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>
Individual	R0687	Other	82. When combined with overshadowing of neighbours who would have to use more artificial lighting, and many of whom, as set out above, already have sustainable heating systems which would be adversely	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and</p>

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			affected, the sustainability of any tall building on this site is questionable.	sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0687	Other	Other issues 83. Requiring the reprovision of an element of light industrial floorspace is a nice idea conceptually but is very likely to affect the viability of the site and push developers to a taller building to make what they consider a realistic return.	The quantum set out in the draft DPD are approximate, informed by high-level testing of the optimum level of development that could in principle be accommodated on the sites. It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development plan. These development proposals will be assessed in detail through the planning application process. The required quantum of light industrial space is in line with London Plan policies applicable to all sites with non-designated industrial uses.
Individual	R0687	Other	84. The indicated replacement of the community use associated with the Christ the Redeemer building is not considered necessary. As can be identified from a review of Google Street View the facility has been empty and protected from illegal occupation since at least April 2019. It is not considered therefore that this community use remains extant.	Comments are noted. While it is acknowledged that the church building is vacant, community use is the lawful use of that part of the site and there is no acknowledged to suggest that there is no demand for a high quality, flexible modern community space in the area.
Individual	R0687	Other	85. The planning history for the Jewson site appears to omit the previous request for an Environmental Impact Assessment Screening Opinion sought for a tall tower proposals on the site in 2017 (17/02300/EIASCP).	Comments are noted. The planning history section has been revised to include details of this request.
Individual	R0687	Other	86. It should be noted that Guy's and St Thomas' NHS Trust also owns the majority of the car park at the end of Dugard Way, although not Dugard Way itself in front of Wooden Spoon House. The car park is for visitors to Wooden Spoon House. This area should be considered within the scheme design.	Noted.
Individual	R0687	Sustainability Appraisal	87. On the Sustainability Appraisal, given the above comments about amenity of existing homes, I would challenge the score of "++" for Item 6 in respect of quiet enjoyment and protection of local amenity. Likewise I could challenge the score of "++" with regards to protection of heritage assets under Item 8.	Noted.
Individual	R0687	Other	Conclusions 88. As demonstrated in my representation above, this proposal has the	Noted.

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			potential for significant effects on existing listed buildings, and on existing homes and the residents of these homes, including effects on the mental and physical health of those existing residents due to loss of daylight and sunlight and increased noise and disturbance.	
Individual	R0687	Other	89. The effects of the proposal in a dense urban area with lots of neighbouring homes have not been studied adequately enough for this proposal to be included in the site allocations document as it stands.	The Draft SADPD for each site is underpinned by the extensive acknowledged documents for each site.
Individual	R0687	Other	90. On the basis of the analysis contained within this representation I respectfully request the London Borough of Lambeth to reconsider the proposals to make them compatible with the immediate context, and to properly assess the proposes being put forward, particularly in terms of the effects on neighbouring homes and on heritage assets.	Noted. See detailed narrative elsewhere in this schedule. Comments are noted. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0723	Other	In responding to your consultation, I would support the redevelopment of the current Jewsons site and adjacent areas and would have no objection to the proposed mixed use comprising light commercial, residential and community.	Noted.
Individual	R0723	Other	I do, however, object strongly to the proposed inclusion of a 50-metre tall building, on the following grounds: • the shadowing caused by such a tall building would harm residents in the extensive area of low-rise housing to the north/north-west/north-east of the site by depriving them of essential sunlight in the crucial winter months. This would apply to my own house;	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led

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				approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0723	Other	<ul style="list-style-type: none"> the proposed tower would be very close to the old fire station and court house, causing harm to the setting of these listed heritage assets; 	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0723	Other	<ul style="list-style-type: none"> together with the other buildings proposed in the draft plan, the tower would represent over-development of this site, particularly given the site's location away from any park or other public amenity space. I do not believe that the amenity space shown in the draft plan is anywhere near sufficient for the numbers who would be housed or working in such a large group of buildings, and this in turn would risk the accommodation being harmful to the welfare of the new residents. With these considerations in mind, the harms caused by a tall building in this location would far outweigh the benefits that it would bring. 	Development proposals would be assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance to ensure that the quality of accommodation meets the relevant standards.
Individual	R0723	Other	An additional consideration is that such a building would be out of character with the area and would not harmonise with the existing built environment. I urge you to consider the adjacent Bellway Water Tower development as well as the Knights Walk redevelopment, currently under construction, as models for what would be appropriate on this site. Both developments have been welcomed by the local community. On this basis, nothing taller than 20m at the outside should be permitted on this site.	Noted.
Individual	R0723	Other	Until recently, I and other members of the local community were confident that our area would be protected from profit-maximising developers by the Lambeth local development plan and particularly by the designation of specific areas in the borough for high-rise developments (which did not include this area, for very good reasons). It seems that this is no longer the case, with the apparent willingness of Lambeth Planners to give serious consideration to a 14-storey building on the entirely inappropriate Woodlands site - something which, if allowed, would be nothing short of a scandal - and now this draft showing a tall building on the Jewsons site, no doubt under pressure from the current owners who submitted outline plans for a tower some time ago and are clearly intending to sell the site for the highest possible price. Please stop making concessions to the money-grabbing bullies and return to protecting the interests of your existing residents and communities - which should always be your first priority.	Noted.

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Individual	R0723	Other	Finally, I would also object to the site having vehicular access from Dugard Way as well as Kennington Lane. That narrow entrance, with people's homes right on the corner, is entirely unsuited to more vehicles passing through. It could create a perilous situation for the many pedestrians and cyclists who use Dugard Way. It would also encourage even more through traffic on our narrow residential streets (Renfrew Road, Gilbert Road, Wincott Street, Reedworth Street).	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.
Individual	R0728	Other	I'm writing regarding the -12 Kennington Lane and Wooden Spoon House, 5 Dugard Way, SE11. This site ought to be redeveloped to provide more homes, but the development ought to be undertaken in such a manner that the development corresponds with both the immediate and surrounding neighbourhood and community. The proposal put forward by Lambeth Council does not respect the existing neighbourhood and community. Four categories There are four categories that the proposed development needs to be 1) Inappropriate design, layout and density affecting existing homes Little meaning consideration of the effects of the developments on existing people's homes in Lambeth Council's consultation. Both the height and bulk of proposed tall tower is to be almost immediately south of and overshadow existing homes as it would block daylight and sunlight. Existing homes to the north, east, and west of the tower are to be most severely affected. Considerable high potential exists for noise and privacy issues from windows, balconies, and terraces both close to and which overlook existing homes.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0728	Other	2) Impact on heritage buildings and conservation areas The impact of this development is harmful to the setting of heritage assets including the Grade II Old Fire Station and Grade II Old Court House (Jamyang Buddhist Centre) which will be negatively impacted by a large, bulky, tall building with 16 storeys or more having a harmful effect on Conservation Areas including Renfrew Road and Elliot's Row.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0728	Other	3) Impact on surrounding Kennington area The proposed tall tower will be against the character of the lower rise surrounding area. The tall tower will be outside of the Elephant and Castle tall buildings cluster. It will therefore stand out. This proposed development much like the Woodlands proposal sets a precedent for more tall buildings across Kennington. This proposed development is outside the areas identified in Lambeth Local Plan as being appropriate for such tall buildings.	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R0728	Other	4) Traffic and transport Significant delivery, servicing, and parking issues exist for this development. The access will be off red route "A" roads at the already busy Kennington Lane, Kennington Park Road and Newington Butts	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. In line with London Plan policy T6 the development would be car free and

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			<p>junction. Traffic currently already tails back along Kennington Lane as far as Cotton Gardens at peak hours currently. No access to the development site from Dugard Way should exist as it is too narrow.</p>	<p>all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.</p>
Individual	R0728	Other	<p>5) Sustainability The sustainability of this proposed development is poor. It is an established fact that tall buildings have poor carbon footprints compared with lower rise buildings in construction materials and methods. Such tall buildings in conjunction with overshadowing of their neighbours' homes causing these existing building to need to use of additional artificial light and also affect existing sustainable heating systems.</p>	<p>There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy. With regards to the impact on neighbours, the indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0745	Other	<p>This proposal does not respect the existing character of the area. The Jewson site should be redeveloped to provide more homes, but the development must fit in with the surrounding neighbourhood and community. 1) Inappropriate design, layout and density affecting existing homes There has been little or no consideration of the effect of the proposals on existing homes in Lambeth Council's consultation. The height and bulk of proposed tall tower would be almost immediately south of and overshadow existing homes, blocking daylight and sunlight, with homes to north, east, and west of the tower most severely affected. A tall tower is inappropriate in this setting.</p>	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be</p>

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			There is high potential for noise and privacy issues from windows, balconies and terraces close to and overlooking existing homes.	independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0745	Other	2) Impact on heritage buildings and conservation areas Harmful to the setting of heritage assets including the Grade II Old Fire Station and Grade II Old Court House (Jamyang Buddhist Centre) which would be negatively impacted by a tall tower. A large, bulky, tall building 16 storeys high or higher would have a harmful effect on Conservation Areas including Renfrew Road and Elliot's Row.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0745	Other	3) Impact on surrounding Kennington area The tall tower will be against the character of the lower rise surrounding area. The tall tower will be outside of the Elephant and Castle tall buildings cluster and therefore stand out. Like the Woodlands proposal, this sets a precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings.	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R0745	Other	4) Traffic and transport There will be delivery, servicing, and parking issues for development. The access will be off red route "A" roads at the busy Kennington Lane, Kennington Park Road and Newington Butts junction. Traffic tails back along Kennington Lane as far as Cotton Gardens at peak hours currently. There should be no access to the development site from Dugard Way which is too narrow.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0745	Other	5) Sustainability Tall buildings have poor carbon footprints compared with lower rise buildings in construction materials and methods. When combined with overshadowing of neighbouring homes, causing them to use more artificial light, and affecting existing sustainable heating systems, the sustainability of the proposed development is likely to be poor.	There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy. Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for

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				<p>the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land), an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building. London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG further require referable applications to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are both strongly encouraged. In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>
Individual	R0787	Other	I strongly object to the suggestion of putting a 50 metre high building on this site, which as the Vision Map shows would be completely out of proportion – twice the height – with existing buildings around it.	Noted
Individual	R0787	Other	I'm also worried about the overshadowing effect it would have on homes in the area and	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0787	Other	the harmful impact on the nearby conservation areas.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate

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				3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0787	Other	I have no doubt too that it would set an extremely unwelcome precedent for other tall buildings in this part of Kennington.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R0787	Other	Separately, any development needs to minimise extra traffic in an area already prone to jams along Kennington Lane.	Vehicular movements generated by the development are expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use. Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected levels of servicing. In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0787	Other	I would be quite happy to see this site developed to produce more housing, but the overall design must be in keeping with the immediate low-rise area: the Water Tower Development in Dugard Way is a good example of how to fit an appropriately-sized and well-designed development into a small area. Another possible model is the redeveloped Knight's Walk estate.	Noted.
Individual	R0829	Other	I have already lodged comments via the Common Place consultation portal on 21 February 2022 with regards to the above referenced site-specific planning policy, however I wish to add some additional points and include an attachment file which I feel reflects and acknowledges my concerns. Firstly, I am broadly in favour of redevelopment of the above-mentioned site and feel it should primarily be allocated solely for a quantum of housing which balances the public benefits versus the public harms. I feel the public benefits should be mostly towards affordable housing and if possible, at genuinely affordable rental levels for families and less focus on one bed units and particularly private housing.	The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan. This includes Lambeth's tenure-split requirement of 70% low-cost rent and 30% intermediate affordable housing and the unit mix for different tenures. See London Plan policies H4, H5, H6 and Local Plan policy H2 and H4.
Individual	R0829	Other	I assume that any developer proposing a scheme for the site will want to bring about a viable and optimum mix of housing and other uses for the site. However, this is primarily where I am concerned and in particular the policy framework which is being proposed for this site. I do not think the site-specific planning policy is appropriate in terms of the buildings proposed heights, realistic in what it can sensitively achieve and likely to be proportionate in terms of the balancing or	The quantum set out in the draft DPD are approximate, informed by high-level testing of the optimum level of development that could in principle be accommodated on the sites. It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development plan. These development proposals will be assessed in detail through the planning application process. Site Allocations will sit alongside the rest of

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			ensuring the public benefits outweighs the harms. That is because I believe the policy is not setting what is the priority/objective for the site, i.e. in trying to provide three different uses (housing, light industrial and community use) then any developer is likely to suggest a disproportionate amount of private market housing to be accommodated on the site in high rise/high density blocks to be able to cross subsidise the other uses. I cannot see any information in the acknowledged report as to whether the proposed policy is likely to be feasible and therefore achievable within the parameters that it sets itself. This does not mean I advocate a high rise/high density proposal; I think what the planning policy should first set is clear priorities and determine an optimum quantum which can meet those priorities while ensuring the harms and in particular the relationship with neighbouring homes, townscape and impact on heritage assets are all balanced. This proposed policy does not in my opinion achieve that. Securing affordable housing with adequate living conditions is just as important as the impact on neighbouring homes residents' amenity and their living conditions.	the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites, this includes policies relating to affordable housing and quality of accommodation. The principle of acceptability of a tall building in the indicated location has been tested with regards to heritage and neighbour amenity impacts.
Individual	R0829	Other	I am also concerned about how the context and constraints of the site are described in the proposed policy which will only lead to a disproportionate development proposal which maximises the planning applicant's private benefits i.e. rate of return. For example, the optimum design led approach will be interpreted by a planning applicant to mean that optimum is maximum high density and will also argue that unless that is permitted then their planning proposal would not be viable. London Plan Policy D3 is widely being interpreted in a cavalier way by planning applicants. I attach to this letter a planning statement for a planning application (Lambeth reference 21/04356/FUL) on a close nearby site to this 'site 7' which demonstrates how the language in the approach to this site can be negatively interpreted by a private planning applicant.	As set out in the introduction to the Draft SADPD and the acknowledged documents for each site, the guiding principle for the draft site allocations is 'design-led optimisation of development capacity'. This is a requirement of London Plan policy – see London Plan policy D3. Local planning authorities are required to consider how best to optimise the development capacity of every site that comes forward for development. The draft SADPD seeks to optimise the development on the site rather than maximise it. At planning application stage, the LPA will review and critically analyse any supporting documents submitted with the application.
Individual	R0829	Other	Other Matters Within the acknowledged report there is also a lack of information on key aspects which raises concerns about how the site-specific planning policy is likely to be interpreted by a private developer. This includes a lack of clarity on what is likely to be the minimum distance between proposed windows and neighbour's windows where buildings are in close proximity to one another. The minimum distance would need to be at least 21m in order to offset the loss of daylight to neighbouring homes which could be facing blocks of six storeys at least in front of them.	This level of detail is not considered necessary within a site allocations policy. Other local and London plan policies and standard will have to be considered by any architect drawing up proposals for the site. Any future proposal will be assessed on its merits against local policy.
Individual	R0829	Other	The Site 7 supporting acknowledged report helpfully identifies the need for sensitivity of any proposed development for residential neighbours, however it is only proposing to set back any development for neighbours on Dugard Way and ignores those on Renfrew Road and Holyoak Road. It is also not clear what "setting back" actually means in real terms. There should be minimal impact on neighbours' outlook, by	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed

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			limiting façade to façade distances to no less than 21m. Where facades are not parallel there may be flexibility to be closer than 21m but no less than 18m.	development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0829	Other	The development should seek to ensure that neighbouring external amenity spaces meet BRE guidelines by having at least half of their area experience at least two hours of sunlight on 21st March and if there is a reduction below 50 per cent, that reduction not more than 20 per cent less than the former value. The development should seek to ensure that neighbouring properties meet BRE guidelines in respect of Vertical Skylight Component and NSL. Retained values must not be less than 20% of their original value in the primary habitable living rooms and bedrooms of neighbouring homes as they will be noticeable by the occupants and could lead to detrimental impacts on the resident's wellbeing.	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0829	Other	The proposed policy should be clear that there should be minimal impact on neighbours' privacy, particularly from the buildings placed closest to the boundaries, with no living rooms (on upper floors), no balconies or roof terraces exclusively facing the boundary	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0829	Other	The Jewson site should be redeveloped to provide genuinely affordable homes, but the development should be done in such a way that the development fits in and is in balance with the surrounding neighbourhood and community. The proposal put forward by Lambeth Council does not respect the existing neighbourhood and community. Will you please examine the issues I have raised and please modify the proposals in their next iteration to address the concerns I have raised,	Noted.

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			and no doubt will be raised by many others. [Attachment: 103 page Planning Statement dated October 2021 for a development at Woodlands and Masters House]	
Individual	R0829	Vision	Regrettably, I do not think the vision is grounded in reality. Kennington Lane cannot be improved for pedestrians and cyclists unless road traffic is prohibited from using it which is not realistic. Since many of the residential side roads are already restricted or seeking restrictions Kennington Lane is heavily congested with construction and delivery vehicles for Kennington and the lane also serves as an arterial route for the construction projects in Elephant and Castle.	It is considered that there is scope to improve conditions on Kennington Lane for pedestrians by widening the footway outside the site for example, which would aid pedestrian movement, accessibility and safety.
Individual	R0829	Vision	I think the site should be prioritised for new housing development. If it has to compete with other uses such as light industrial use then any developer will seek much higher densities to subsidise their provision. We have already seen this approach cynically adopted by other developers in the area. I think the policy is trying to achieve too much and therefore it should prioritise what would be the optimum development on the site which will balance the public benefits and harms.	Draft site allocations policies seek to ensure that their re-development is sustainable and archives an optimum level of development and balance between the different aspects of sustainability such as economic, social and environmental factors. The re-provision if light industrial uses will contribute to the economic development in the area and the wider borough. The draft site allocation policy and associated indicative massing have been tested to ensure that there would be no heritage or other harm that would require to balance public benefits and harms.
Individual	R0829	Vision Map	Appreciate the recognition of the sensitivity of any developments to the surrounding residential homes. I think the vision needs to conduct some sensitivity testing of what is proposed in the acknowledged report with how that will impact not only the levels of daylight, sunlight and overshadowing to existing neighbouring homes; but also the proposed homes on the site which will be sharing the same site space with light industrial users. The current acknowledged suggests that the impact on neighbouring residential amenity in terms of breaches of daylight will be adverse and counter to the BRE guidelines. The proposed homes on many of the lower floors are also unlikely to achieve satisfactory daylight levels.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0829	Context	The issues in terms of the context of the site must relate to the fact that the existing urban area is lower rise urban area. The tall tower will be against the character of the lower-rise surrounding area. The site is outside of the Elephant and Castle tall buildings cluster and therefore will appear "alien and incongruous" to the character of the area to quote a planning inspector who dismissed a tall building proposal on a neighbouring Kennington site (Ref. No:	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.

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			<p>20/00029/FULNDT). There are also planning histories for neighbouring developments which should be considered more relevant and they include 19/02696/FUL and the Knights Walk development.</p> <p>Whilst it is helpful that the site is not denoted as part of a town centre we have seen developers say that "yes, but is within 800m of a town centre" and therefore that justifies their highest density proposal"</p> <p>Like the Woodlands proposal, this sets a precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings</p>	
Individual	R0829	Acknowledged	<p>The acknowledged report lacks clear information on the likely BRE impact breaches that the current proposed site specific planning policy is likely to inflict on the neighbourhood.</p>	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0829	Acknowledged	<p>There is also a lack of information on environmental impacts and how this proposal will meet the zero carbon goals that Lambeth Council has set itself.</p> <p>A significant part of the carbon emissions proposals from the existing site infrastructure will be released from its redevelopment. So it would be helpful to understand how this will be offset?</p> <p>Tall buildings have poor carbon footprints compared with lower rise buildings in construction materials and methods. When combined with overshadowing of neighbours' homes, causing them to use more artificial light, and affecting existing sustainable heating systems, the sustainability of the proposed development is likely to be very poor.</p>	<p>There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.</p>
Individual	R0829	Acknowledged	<p>I am also concerned about some of the language used in this proposed policy. Paragraph 1.4 of the acknowledged report states "For this reason, the indicative quantum included in the draft allocation are approximate and should not be read as absolute minima or maxima". However because the policy is trying to achieve too much, the quantum will likely to be the minimum density that any developer will propose. I have seen planning statements from developers who naively believe</p>	<p>Comments are noted. The policy is clear that the indicative quantum included in the draft allocation are approximate. The quantum has been informed by the design-led optimisation of development capacity on each site as demonstrated in the acknowledged.</p>

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			optimum quantum actually means maximum profit; and optimum viable use is a obstacle course for consultees to navigate their way around. Please set clear priorities for this site and seek a realistic balance between public benefits and harms.	
Greater London Authority	R0852	Other	<p>The Mayor welcomes the intention to protect existing industrial capacity. As part of the site contains undesignated industrial uses, Policy E7C of the LP2021 applies and should be reflected in the proposed allocation. As the borough is in the CSA, there should be a greater focus on the need to provide essential services to the CAZ in accordance with paragraph 6.4.7 of the LP2021 and this should be incorporated into the allocation. These services include sustainable last mile distribution/logistics, 'just-in-time' servicing among others.</p> <p>It is noted that an affordable housing threshold of 42% has been set across the site as a whole. The site allocation should make it clear that the 50% threshold only applies to the land with is considered to be 'public land' for the purposes of the Mayor's threshold approach and not the land in private ownership where the 35% threshold will apply.</p>	<p>London Plan paragraph 6.4.7 is noted and was fully acknowledged throughout the preparation and examination of the Lambeth Local Plan 2021. However, it does not follow that every site in use as non-designated industrial land with potential for mixed use redevelopment will be suitable for sustainable 'last mile' distribution/logistics, 'just-in-time' servicing, waste management and recycling or uses to support transport functions. It would not therefore be reasonable to require all sites to provide these uses. This site is tightly constrained and it may be difficult for an applicant to include these types of uses, rather than light industrial workspace, alongside residential. To require them in this case could render the site undeliverable. It should also be noted that this site is within the Brixton CEZ, so the priority requirement would be for light industrial space suitable for creative and digital enterprises. It is very unlikely the site could accommodate both that type of space and uses that service the CSA. With regards to the comment about affordable housing thresholds, Lambeth officers consider that the existing wording in the draft SADPD is very clear on this subject and does very explicitly address the points raised. Please can the GLA clarify this comment and propose a solution for Lambeth officers to consider?</p>
DP9 on behalf of London Heights	R0884	Other	<p>1. Thank you for providing us with the opportunity to comment on the London Borough of Lambeth's (LBL) Draft Site Allocations Local Plan (LDSAD) document as part of the Regulation 18 consultation ending on 22 February 2022. These representations are submitted on behalf of our client, London Heights LLP.</p> <p>2. London Heights LLP owns the site at 6-12 Kennington Lane, Lambeth (referred to as 'the site'). The LDSAD includes 6-12 Kennington Lane and Wooden Spoon House which is owned by Guy's and St Thomas' NHS Foundation Trust. The client has been in discussions with Guy's and St Thomas' NHS Foundation Trust for over 4 years. At the current time, the Trust have no clear position on what they intend to do with the site and our understanding is that no decision or timeframe has been set to confirm this. As set out to Officers at pre-application stage, the Clients aspiration would be to comprehensively develop the site including Wooden Spoon House if the necessary agreements were in place. At this current time, there is no agreement or confirmation that the sites can be developed comprehensively and therefore the client cannot be reliant upon that site being developed in the same timeframes as 6-12 Kennington Lane. In light of this, the correct approach with the site allocation is a coordinated design approach that allows for either site to come forward independently. Wilkinson Eyre has within Appendix 1 provided an illustrative drawing as or how these can be bought forward comprehensively and</p>	<p>The draft site allocation policy has been revised and it acknowledges that there would be no in principle objection to the provision of a tall building even if the site does not come forward for a comprehensive development, subject to demonstration that the scheme does not prejudice the remainder of the site.</p>

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			<p>separately.</p> <p>3. Pre-application discussions relating to the site allocation began in June 2020, albeit pre-application discussions date back to 2017. An initial meeting was held in July 2020 with the Council Development Management Officers and Planning Policy Officers involved in the drafting of the site allocation. At this meeting, it was clear that there was plenty of common ground around the uses and design principles for the allocation. At this meeting, it was set out by Officers that there would be continued engagement around the site allocation and the Council would share information in advance that helped inform the proposed site allocation. This could then be reviewed by the client and discussed at the next meeting. The client ensured that there was multidisciplinary team instructed from the outset, including an architect, daylight and sunlight consultant and townscape consultant.</p> <p>4. Following the initial meeting in June 2020, the client team undertook careful analysis of the site and its context and shared this with the Council. Meetings were held at the following times:</p> <ul style="list-style-type: none"> • January 2022 • September 2021 • October 2021 • September 2020 • July 2020 <p>5. Since the initial meeting in June 2020, no information has been shared or issued on the LDSAD with reference to 6-12 Kennington Lane and comments made within the pre-application meetings, in our view, have not been taken into account and therefore we are using this opportunity to make these comments as part of the LDSAD consultation.</p>	
DP9 on behalf of London Heights	R0884	Other	<p>Vision</p> <p>6. We support the principle of the allocation of our client's site within the wider site allocation 7. The recognition that the site can accommodate taller buildings is supported alongside the overall redevelopment for comprehensive mixed-used scheme. It is also recognised and supported that the future development within the site has capacity to provide high levels of homes and jobs.</p>	Noted
DP9 on behalf of London Heights	R0884	Other	<p>7. We are keen to ensure that maximum flexibility in relation to mixed-use development for this site is maintained through the site allocation to ensure that the site can reach its full potential in meeting and exceeding targets set by the Lambeth Local Plan 2021.</p>	Comments are noted. It is considered that the revised wording of the draft policy allows sufficient flexibility.
DP9 on behalf of London Heights	R0884	Other	<p>8. The vision for the site within the LDSAD is to provide a mix of uses to include replacement light industrial capacity and community facilities, along with new housing and affordable housing. Whilst close to the Elephant and Castle Opportunity Area, the site is not in a town centre and is designated as non-designated industrial site. The allocation then goes to state that "comprehensive development presents an opportunity to enhance the townscape and street scene on a main road frontage.</p>	Noted.

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			<p>High quality design will enhance local character and heritage through appropriate materials and building form." We agree with LBL that the comprehensive site provides an opportunity to enhance the townscape and street scene through high quality design. The client has employed WilkinsonEyre who is one of the world's leading architectural practices with a portfolio of national and international award-winning project with significant experience of designing tall buildings and is very well placed to design a high-quality building at 6-12 Kennington Lane.</p> <p>9. Within the allocation, there is an associated vision map that provides an overview of residential receptors and locations appropriate for tall buildings. We will go into more detail on this later within the representations, but we agree that a tall building can be accommodated on 6-12 Kennington Lane and agree with the location of current sensitive residential neighbours. We disagree that the building should be a height of 50m and are of the view that a building taller than 50 metres would be suitable and recognised in policy.</p>	
DP9 on behalf of London Heights	R0884	Other	<p>Land Uses</p> <p>10. We agree that developing the two sites together provides the 'best place shaping outcome' but as we have set out at the beginning of this letter and through pre-application discussions, in reality bringing these sites forward may not be possible and, as acknowledged by the Council, "given the two separate land ownerships, the site may come forward in two phases." Should this be the case, the Client will ensure to continue meaningful engagement with the Trust relating to the Wooden Spoon House development.</p> <p>11. With regards to land uses, the LDSAD outlines that the site has the potential to accommodate.</p> <ul style="list-style-type: none"> • At least 2,200 sqm GIA of light industrial floorspace to achieve no net loss of industrial capacity (based on 65 per cent of the area of the existing builders' yard). • Approximately 135 to 145 self-contained residential units. • A replacement community use of equivalent or better functionality to the existing space within the Christ the Redeemer building. Main town centre uses are not appropriate in this out of centre location. <p>12. The client acknowledges the requirement to replace the light industrial floorspace and achieve no net loss of industrial capacity (based on 65 per cent of the area of the existing builders' yard). We disagree, as set out during pre-application discussions that only 135 to 145 self-contained residential units can only be provided on site. In our view, additional residential units can be provided on both sites comprehensively and on a standalone basis in a building that sits above 50 metres. No rationale has been in support of the unit threshold and as currently drafted we do not believe that the proposed allocation is 'justified' as set out in the National Planning Policy Framework, paragraph 35 as it is not based on proportional acknowledged that is publicly accessible and the LDSAD should remove reference to a</p>	<p>The quantum set out in the draft DPD are approximate, informed by high-level testing of the optimum level of development that could in principle be accommodated on the sites. The policy does not set out the maximum numbers. The accompanying acknowledged shows what informed these approximate quantum. The It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development plan. These development proposals will be assessed in detail through the planning application process.</p> <p>With regards to community uses, main town centre uses would not be appropriate on this site. Main town centre uses are defined in the NPPF. There would be no objection on land use grounds to other community uses which are not listed in the main town centre uses.</p> <p>With regards to the employment and skills plan, the supporting text to Policy ED15 recognises that the Council works with other London boroughs on programmes which can involve the sharing of job vacancies across boroughs. Opportunities secured from developments in Lambeth may be made available through these programmes. The details of the employment and skills plan for this site and any relevant programme with Southwark residents would be considered at planning application stage.</p>

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			<p>maximum number of residential units.</p> <p>13. The LDSAD seeks a replacement community use of equivalent or better functionality to the existing space. The allocation prohibits town centre uses, however there are some community uses that would fall into 'town centre' uses and so it would be useful to understand whether some 'town centre uses' may be considered suitable for the replacement community use.</p> <p>Employment and skills</p> <p>14. We welcome the opportunity to maximise employment opportunities on site, however the preferred land uses as set out in the allocation are less employment intensive due to the nature of the uses. Policy ED15 states that "a target of 25 per cent of all jobs created by the development (in both the construction phase and net additional jobs for the first two years of end-use occupation of the development) to be secured by the council for local residents."</p> <p>15. The objective to recruit local residents is understood. The requirement that 25% of all jobs should be for local residents should, however, be treated cautiously. The implications of this requirement related to a site such as this that sits close to the border with Southwark could provide difficult to achieve.</p>	
DP9 on behalf of London Heights	R0884	Other	<p>Building heights and views; townscape</p> <p>16. The LDSAD states that "If developed comprehensively, part of the site is appropriate for a tall building of a general building height of 50m, in the location shown. The remainder of the site is appropriate for low-rise and mid-rise development, stepping up in height from the lowest around the perimeter of the site where neighbour constraints are most sensitive. If the site is developed in two phases, the first phase should not limit optimisation of the second. Developed alone, neither 6–12 Kennington Lane nor 5 Dugard Way is likely to be able to accommodate a tall building as a result of each separate site's smaller developable area and because a comprehensive approach will allow for greater capacity to accommodate the appropriate mix of uses, servicing and the necessary setting for a tall building."</p> <p>17. There is significant concern surrounding the wording of this allocation and the client disagrees that a tall building can only be provided if the sites are bought forward together. We query how this is justified with regards to paragraph 35 of the NPPF. Further information is required behind the rationale as to why a building can only be provided if two sites are bought forward together. The principle and review of this site for a tall building has been thoroughly tested by the client in pre-application discussions as well as an option which considers the potential future development of the Wooden Spoon House site to the north.</p> <p>18. Tall building locations have been tested against a ground plane arrangement which considered solar path; daylight and sunlight, residential amenity, heritage buildings to west and residential blocks to</p>	<p>Comments are noted. The draft site allocation policy has been revised and it acknowledges that there would be no in principle objection to the provision of a tall building even if the site does not come forward for a comprehensive development, subject to demonstration that the scheme does not prejudice the remainder of the site.</p>

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			<p>East and we are strongly of the view that a tall building can be provided on the site at 6-12 Kennington Lane if it was bought forward as a separate phase and would not negatively impact the second phase (Wooden Spoon House). A meeting has been undertaken with daylight and sunlight professionals and the proposed scheme presented at pre-application has been refined in response to daylight studies.</p> <p>19. The submitted pre-application proposals has demonstrated how a tall building (above 50m) can be successfully integrated into the site's proposals and wider townscape to provide the required land uses through a high-quality design which recognises the designated views. The design, form and massing of a building can respect and respond to its location. We ask that the LDSAD is amended to remove reference that only a tall building can be provided if two sites are bought forward together and that it reflects the studies/pre-application discussions that have been undertaken over the past 2 years.</p> <p>Transport, Movement and Public Realm</p> <p>20. The site allocation requires that no new public pedestrian routes or spaces should be provided between Kennington Lane and Dugard Way to maintain Renfrew Road as the primary local pedestrian north-south as this will reinforce community safety by avoiding pedestrian dispersal, especially at night. Whilst we understand the importance of community safety and not disputing that this is of utmost importance, by completely removing any opportunity to provide route throughs is quite restrictive and there could an opportunity for a more managed situation. Some flexibility should therefore be included in the wording of this part of the site allocation</p>	
DP9 on behalf of London Heights	R0884	Other	<p>Conclusion</p> <p>21. We welcome this opportunity to provide comments on the LDSAD. The considerations outlined above are critical for the successful development of the site and in order to deliver the key aspirations shared by both LBL and London Heights LLP and the significant potential benefits that could arise from an application on this site. Should these proposals not be realised then the site will remain in its current use and occupation for the foreseeable future.</p> <p>22. We trust that the above representations will be fully considered. We look forward to confirmation that these representations have been received and how LBL seek to address them. We reserve right to make further objections if these concerns are not addressed and would participate at the hearing in the Examination in Public if necessary. If you require any additional information, or would like to discuss this matter further, then please do not hesitate to contact [Redacted] at this office.</p> <p>[Proposed Site Masterplan attached]</p>	Comments are noted.
Environment Agency	R0886	Other	<p>Current flood zone designation: 3 (partially in tidal breach modelling)</p> <p>Rivers on / adjacent to site / flood defences: No</p> <p>Permitted waste site within 250 metres: No</p>	Noted. The draft policy text has been amended to address this point.

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			Groundwater Source Protection Zone: No Comments to add into site allocation text: Protect groundwater from contamination sources	
Individual	R0891	Other	I would like to raise my concerns regarding Proposed site 7 : 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way, SE11. I find it hard to believe that this site specific planning policy can be muted without the publicity that would give local residents a real chance to comment. If it were not for Stop the Blocks, I suspect hardly anyone would have commented leaving it open to state that residents had their chance and said nothing. This would leave locals at the mercy of another greedy, uncaring developer only interested in maximising their profit but worst of all, with the blessing of Lambeth. I find this both amazing and disgraceful.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. [If applicable: This includes the timeframe of the consultation.] A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.
Individual	R0891	Other	The Jewson site should be redeveloped to provide more homes, but the development should be done in such a way that it carefully and respectfully fits in with the surrounding neighbourhood and community. The proposal put forward by Lambeth Council certainly doesn't respect the existing neighbourhood and community.	Noted.
Individual	R0891	Other	Tall building: The proposed development of a tall tower on this site is not current policy and is not in an area identified in the Lambeth Local Plan 2021, or its supporting documents, as a site suitable for a tall tower.	A site allocations development plan document is a means by which the LPA can identify locations suitable for tall building development.
Individual	R0891	Other	A tall tower will be out of character with the rest of the Kennington area.	The locality is varied with point blocks on Cotton Gardens Estates and on Cottington Close Estate.
Individual	R0891	Other	It would have significant effects on the amenity of existing homes, including daylight and sunlight and loss of privacy.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant

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				guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0891	Other	It will also completely obscure the views of the Grade II listed Old Fire Station watchtower to the rear, which is one of the elements which marks the building out as having been a fire station.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable. The glimpse views of the rear of the fire station are only really possible because of the open nature of the Jewson's Yard. Historically the frontage development along Kennington lane would have screened these views. Given this the Council has not considered the loss of these views to be harmful.
Individual	R0891	Other	Inappropriateness of the built form and overdevelopment of the site: The proposed 50m tower is substantially out of scale compared with its immediate context which is 2 to 5 storey buildings. As identified in the appeal for the Woodlands site, this site is also next to an area designated in the Elephant and Castle Opportunity Area Framework as being suitable for lower rise development. This should be given greater weight in considering proposed uses for this specific Site.	Noted.
Individual	R0891	Other	Precedent developments: No tower developments currently built in the Elephant and Castle Opportunity Area have had existing homes on their north side so close to the development site. Homes, and the people in them, to the north, northeast and northwest of the development site will be most affected by loss of daylight and sunlight. There are more suitable development precedents in the vicinity, including Lambeth Council's own Knight's Walk, 130 - 138 Newington Butts (now known as 2 Kennington Lane and 3 Holyoak Road) and Manor Place Depot (which is within the Elephant and Castle Opportunity Area).	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0891	Other	Effects on amenity: There has been no meaningful consideration of effects on people's homes in Lambeth Council's consultation. The proposed development would have significant effects on existing	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best

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			<p>surrounding homes in terms of loss of daylight and sunlight and loss of privacy.</p> <p>The height and bulk of proposed tall tower would be almost immediately south of and overshadow existing homes, blocking daylight and sunlight, with homes to north, east, and west of the tower most severely affected.</p>	<p>practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R0891	Other	<p>There is high potential for noise and privacy issues from windows, balconies and terraces close to and overlooking existing homes.</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R0891	Other	<p>Heritage: This would be harmful to the setting of heritage assets including the Grade II Old Fire Station and Grade II Old Court House (Jamyang Buddhist Centre) which would be negatively impacted by a tall tower.</p>	<p>The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an</p>

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				unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0891	Other	A large, bulky, tall building 16 storeys high or higher would have a harmful effect on Conservation Areas including Renfrew Road and Elliot's Row.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0891	acknowledged	Acknowledged presented is misleading: The Acknowledged Report contains a visual at Figure 17. However it shows shadows from right at the end of the day, as the sun goes down in the west. This obscures the fact that for much of the day the tall tower would devastate the sunlight and daylight for existing homes to the north and west. The assessment of views also extends this same basic error, with sun shining brightly from the west.	
Individual	R0891	acknowledged	Some of the assessment of local views misrepresents the likely effects with the worst, but by no means the only, misrepresentation being the presentation of the likely effects on the view between the Old Courthouse and the Old Fire Station. This assessment shows the tall tower barely visible behind the Old Courthouse when In reality, a few paces along the road towards Kennington Lane would show the tower to most of its extent in the gap between the buildings, above the Old Courthouse yard.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0891	acknowledged	Transport and servicing: Access to the proposed development is dismissed in a couple of lines in the Acknowledged Report (para 4.3). However this is a site located at the junction of two TfL Red Routes, where traffic regularly backs up along Kennington Lane beyond the pedestrian crossing and, in peaks particularly, is often queuing northbound well back past Cottington Street. Just yesterday, I witnessed traffic backed up well beyond the junction with Kennington Road.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use. Re the reference to access at para 4.3 of the Acknowledged Report - Acknowledged Report should be amended e.g. Fig 1 red line doesn't include the "lane along the western side of the site"
Individual	R0891	acknowledged	The text states that there is to be no new north south access between Kennington Lane and Dugard Way, but Figure 16 appears to show just that. There can be no substantive access to the development via Dugard Way. The infrastructure is without doubt, not capable of accommodating it. Based on acknowledged from the "Uncle" development, the number of deliveries per day will be substantial and need to be accommodated. This does not appear possible along the "lane along the western side of the site" (para 4.3) which, in the absence of any detail is assumed to be the one currently providing the only access to the front door of number 34A Kennington Lane.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Vehicular movements generated by the development are expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use. Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected levels of servicing. Re the reference to access at para 4.3 of the Acknowledged Report - Acknowledged Report should be amended e.g. Fig 1 red line doesn't include the "lane along the western side of the site"

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Individual	R0891	acknowledged	There will be delivery, servicing, and parking issues for development. The access will be off red route "A" roads at the busy Kennington Lane, Kennington Park Road and Newington Butts junction.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R0891	acknowledged	There should be no access to the development site from Dugard Way which is already very busy. This entrance is narrow and Renfrew Road will also be much busier in the future when congestion charge timings change and even more so when whatever is built on the Old Woodlands site actually happens.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.
Individual	R0891	acknowledged	Lack of realistic development considerations: Many of the "asks" within the Acknowledged Report would affect the viability of the site and would push the development of a tall tower even higher to achieve developer returns: Requiring the re-provision of an element of light industrial floorspace will affect the viability of the site and push developers to a taller building to make what they consider a realistic return . The inclusion of a "public square" will reduce significantly the developable area and likewise push the tower higher. The inclusion of basement parking and servicing would substantially increase build cost and push the tower even higher to cover the cost.	The quantum set out in the draft DPD are approximate, informed by high-level testing of the optimum level of development that could in principle be accommodated on the sites. It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development plan. These development proposals will be assessed in detail through the planning application process. The required quantum of light industrial space is in line with London Plan policies applicable to all sites with non-designated industrial uses. The site is located in an area of open space deficiency and therefore Local Plan policy EN1 applies which requires the provision of new open space, however this does not have to be in the form of a "public square". The policy does not include a requirement to provide basement level parking.
Individual	R0891	acknowledged	Lack of detailed study: This proposal has been put forward with no detailed consideration of the potential effects of a tall building on this site. There are likely to be significant effects on amenity, on daylight and sunlight and on heritage assets (listed building and conservation area). Whilst the latter is acknowledged in the consultation material no detailed study appears to have been undertaken. It would seem that the potential for effects on amenity of neighbouring homes is barely mentioned at all. This is hard to believe from Lambeth and terribly worrying. In a dense urban areas such as this, these effects could be significant.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0891	acknowledged	Sustainability issues: Tall buildings have poor embodied carbon footprints compared with lower rise buildings. There are particular issues associated with embodied carbon in building materials and in the construction methods.	There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.
Individual	R0891	acknowledged	When combined with overshadowing of neighbours' homes, causing them to use more artificial light, and affecting existing sustainable	the images shown in acknowledged relating to heritage impacts do not form part of the daylight and sunlight assessment which was undertaken

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			heating systems, the sustainability of the proposed development is likely to be poor.	separately. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0891	acknowledged	The conclusion of the Acknowledged Report claims that the indicative approach has been "tested at the level of general massing and height to ensure acceptable impacts in relation to daylight and sunlight..." but there is no acknowledgment presented that this has been the case	Daylight and sunlight related acknowledgment is now included in the acknowledged documents.
Individual	R0891	acknowledged	Proposing a tall tower which, if this policy is approved will effectively be "baked in" to the plans for the site, is reckless and arrogant without a more detailed study of the likely effects on people's homes.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0891	acknowledged	Summing up: This SADPD is severely flawed and will undoubtedly cause massive harm to existing residents. It will also set a terrible precedent.	Comments are noted and detailed responses to each concern raised have been provided separately. Consultation responses have influenced the revised draft SADPD in some areas.

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			<p>I find it terrifying that Lambeth can produce and put this document forward and I live in fear that this development plan may be adopted in the future.</p> <p>I urge all concerned to reconsider.</p>	
Individual	R0947	Other	<p>In reply to your consultation on the above, whilst we welcome the proposal to regenerate this site into residential, we strongly object to the suggested density and height of your outline proposals. This is a low-rise neighbourhood with a number of conservation areas and historic buildings and there have been many sensitive new developments in recent years (e.g.: the Water Tower development, Elliza Cook House, The Autism school, Lollard Street to name a few).</p> <p>These outline proposals are totally unsuitable for the area and LB Lambeth needs to revise them to take account of the views of residents and not just maximise potential dwelling numbers and revenue raising base.</p>	<p>Noted. The locality is varied with point blocks on Cotton Gardens Estates and on Cottington Close Estate.</p>
Individual	R0948	Other	<p>I am emailing because the 'commonplace' website Lambeth have set up for responses is difficult to navigate and exasperating.</p> <p>I wish to object to the proposals for the Jewson site on the grounds that this small site is not suitable for such density of development which will have a detrimental effect on the homes of Lambeth residents. The Woodlands proposal is bad enough but this would add further impact on this low level housing area, impact on privacy, noise and overshadowing. Lambeth do not seem to care at all about residents who already pay council tax to them, only in new residents and income from developers. Local residents do not want tall buildings.</p>	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity')</p>

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				and H5 'Housing standards').
Individual	R0948	Other	There is not the infrastructure in place for all these residents and the surrounding roads will suffer initially from construction and later delivery traffic which will go on for years.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use. Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected levels of servicing. A Construction Management Plan would also be secured by condition, which would manage the impacts of construction traffic.
Individual	R0948	Other	There will be a negative effect on listed and important historical buildings and conservation areas.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0948	Other	Lambeth should be listening to its residents and not proposing and considering overdevelopment like this and Woodlands. We will be adversely affected by loss of privacy and light, resulting in more use of artificial light and higher bills. This is not good value sustainability to the taxpayer of Lambeth, it will cost us more.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0949	Other	I really cannot believe that Lambeth are putting this plan forward - The proposed development of a tall tower on this site is not current policy and is not in an area identified in the Lambeth Local Plan 2021, or its supporting documents, as a site suitable for a tall tower.	Site allocations policy documents are an accepted means by which locations suitable for tall building development can be identified.
Individual	R0949	Other	This would have a detrimental effect on all nearby heritage assets	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has

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				subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R0949	Other	<p>I would also like to comment on a statement from your vision "There are also opportunities to improve Kennington Lane for pedestrians and cyclists, by widening the pavement and for a signalised crossing to be provided on the Kennington Lane frontage."</p> <p>The specific area where the new site will border Kennington Lane may be OK for widening.</p> <p>As Kennington Lane is bumper to bumper with cars, vans and lorries for most of the day, allied to the increased traffic from what will inevitably arrive when the Woodlands development (whatever the format may be) goes ahead, it would seem a very strange idea to purposely increase traffic congestion and pollution ??</p>	<p>The widening of the footway that's referred to would be achieved through the reallocation of private land rather than by narrowing the carriageway, so should not impact on traffic congestion.</p> <p>The Vision section will be amended to remove 'and for a signalised crossing to be provided on the Kennington Lane frontage' - as per the Policy text 'Depending on the location of any vehicular access points, an existing signalised pedestrian crossing may need to be relocated', rather than any additional crossing point be provided.</p>
Individual	R0949	Other	Also regarding traffic congestion - The proposed Dugard Way (off Renfrew Road) access is really going to increase traffic to an unbearable level in a small residential street which is already a specific rat run which will worsen now with the Mayors reversion of CC timings and the aforementioned future Woodlands development.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.
Individual	R0949	Other	The conclusion of the Acknowledged report claims that the indicate approach has been "tested at the level of general massing and height to ensure acceptable impacts in relation to daylight and sunlight..." but there is no acknowledged presented that this has been the case.	Daylight and sunlight related evidence is included.
Individual	R0949	Other	Proposing a tall tower which, if this policy is approved will effectively be "baked in" to the plans for the site, is reckless and arrogant without a more detailed study of the likely effects on people's homes.	<p>As set out in the introduction to the Draft SADPD and the acknowledged documents for each site, the guiding principle for the draft site allocations is 'design-led optimisation of development capacity'. This is a requirement of London Plan policy – see London Plan policy D3. Local planning authorities are required to consider how best to optimise the development capacity of every site that comes forward for development.</p> <p>The rationale under-pinning the parameters for height and massing in the draft allocation for Site 7 is set out in the acknowledged document for that site, following the principle of design-led optimisation.</p>
Individual	R0949	Other	<p>The proposed development would have significant effects on existing surrounding homes in terms of loss of daylight and sunlight and loss of privacy.</p> <p>The height and bulk of proposed tall tower would be almost immediately south of and overshadow existing homes, blocking daylight and sunlight, with homes to north, east, and west of the tower most severely affected.</p>	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led</p>

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				approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0949	Other	There is high potential for noise and privacy issues from windows, balconies and terraces close to and overlooking existing homes. There has been no meaningful consideration of effects on people's homes in Lambeth Council's consultation.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site.
Individual	R0949	Other	In fact, if it were not for Stop The Blocks Community Action Group, nobody in the area would have commented, such was the poor consultation from Lambeth. I ask Lambeth to drop or severely amend this SADPD	Noted.
Individual	R1023	Other	I write regarding the proposal for site allocation 7 in the Draft Lambeth Site Allocations Development Plan Document. The site is close to my property [redacted]. I object to the proposed approach Lambeth Council has put forward for this site and request that Lambeth Council reconsult on revised lower density proposals that are sensitive to the surrounding area. The tallest element of the proposal would see a tower of approximately 16 storeys next to the listed Old Fire Station. The site is outside of opportunity areas at Elephant and Castle and Vauxhall Nine Elms that provide designated areas for tall building clusters.	Noted.
Individual	R1023	Other	A tall building on this site paves the way for a string of tall buildings linking Elephant and Castle and Vauxhall Nine Elms, which at a strategic level is detrimental to Kennington and its surrounding areas which are characterised by low-rise buildings, conservation areas and historic assets including listed buildings.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.
Individual	R1023	Other	At a local level, the proposed approach would be detrimental to the Renfrew Road Conservation Area and setting of listed buildings namely the Old Fire Station and the Old Courthouse in the immediate vicinity and also Master's House and the Water Tower nearby. The watchtower in the Old Fire Station should be the tallest feature of the immediate	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an

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			area as it provides an important visible historical point of reference to the Old Fire Station's former use. This group of listed buildings, all in close proximity, is important to the character of the area and the conservation area put in place to preserve this character should be respected. Any new proposals should complement and enhance the historic character of the area and its low-rise granular urban form. The proposed approach, with an inappropriate tower and bulky blocks, is neither complementary nor appropriate for this location.	unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1023	Other	At a practical level, arrangements for deliveries, servicing and access are not appropriate given the level of congestion on Kennington Lane and at the junction of Kennington Lane and Kennington Park Road. The safety of cyclists using these roads and the impact of access points and additional traffic from this proposal should be given specific consideration.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use. Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, and an assessment of the impacts of the development on vulnerable road users.
Individual	R1023	Other	The privacy, daylight and sunlight impacts of this proposal on local residents are likely to be significant and I request that revised proposals are brought forward that limit adverse impacts to existing residents. Thank you for considering my representation. I support redevelopment of this site but urge Lambeth Council to rethink the proposed approach and reconsult the community on revised proposals.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1064	Other	I am concerned that there has not been a meaningful consultation carried out with regard to Site 7 within the local community.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. [If applicable: This includes the timeframe of the consultation.] A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version

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Individual	R1064	Other	I live on [redacted]. We already experience high traffic flow on this road, which will likely be exacerbated by building works, and additional traffic to and from the building once it is completed.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use. A Construction Management Plan would be secured by condition, which would manage the impacts of construction traffic.
Individual	R1064	Other	It is not clear what impact this will have on the infrastructure and public services in the area, in particular the Hurley Clinic. It's very concerning that the local community has not been consulted with more significantly.	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the acknowledged for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.</p> <p>With regards to consultation, it was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. [If applicable: This includes the timeframe of the consultation.]</p> <p>A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version</p>
Individual	R1094	Other	<ul style="list-style-type: none"> • Any development of this site, and all Lambeth proposed development sites are supported by a full independent Design Review Panel process, accountable to residents, local businesses and all impacted on by each site. Paid for entirely by the developers according to Lambeth Council's own DRP policy. The DRP occurs at ever stage of scrutiny of design, starting at feasibility, through to detailed planning and Building Regulations submission, to meet the current highest quality standards. All members of the DRP panel should be fully briefed and demonstrate 	Lambeth's Independent Design Review provides input into the design development of major schemes at design development stage.

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			ability to interpret policy developments of both GLA London plan as well as Lambeth Council's Local Plan, prior to commencing any DRP process. At each RIBA workstage a clearly defined process, planned and publically reported process shall be set out from the beginning with defined level of high-quality design standards in response and the roles and responsibilities of the decision makers. Resource shall be provided by Lambeth Council to facilitate the process in full including community liaison engagement and reporting.	
Individual	R1094	Other	<ul style="list-style-type: none"> Lambeth Council will not continue with the deeply flawed Local Councilor led 'design for the community' approach, which was adopted on Woodlands Site. It's approach was challenged at the time by numerous objectors, including myself, to be told by councilors that 'on another planet would DRP be followed' in conflict with the Lambeth Council officers advice that Lambeth Council had a full functioning DRP process. Lambeth Council should demonstrate effectiveness and scrutiny of the DRP process as unclear what projects have been supported to the benefit of the public, rather than the developer. Lambeth Council established the Design Review Panel process in 2019 to commit to securing high-quality development across the borough. 	Noted
Individual	R1094	Other	<ul style="list-style-type: none"> The needs of the users of current generation aswell as future generation needs to be at the centre of all decisions, in order to desing for the impacts of climate change for a 60 year period – deign for 2080. All aspects need to be designed to current and developing guidance on adpatation to climate change, including Good Homes Alliance best practice, including design for use to 2080. 	There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.
Individual	R1094	Other	<p>Development layout, massing and height</p> <ul style="list-style-type: none"> The development needs to be appropriate in terms of density, massing, height, or design standards appropriate to the site size, character, setting or context. The site design brief should identify the density appropriate for the site (LP 2021 Policy D3: The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context) 	Noted. Design options were considered as part of the preparation work for the initial indicative approach. That in turn was revisited and refined for the current iteration of the acknowledged.
Individual	R1094	Other	<ul style="list-style-type: none"> The design is overbearing, with the scale of this development not appropriate for the site in the urban low-rise area. <p>The proposals should provide options including a lower density development that would protect the significance of the listed buildings, Conservation Areas and respect the prevailing building heights, density and massing of the surrounding residential properties.</p>	Noted. The indicative approach has sought to identify one approach to the optimisation of the site. The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative

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				approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1094	Other	<ul style="list-style-type: none"> • Adequate urban design analysis needs to be provided, and not accept inappropriate reasoning such as 'lowered height reduces the impact' which does not address the over-development of the site. (LP 2021 Policy D9: Tall Buildings) Context and townscape and the National Model Design Code ten characteristics of a well-designed place (or similar), needs to be demonstrated, tested and demonstrate successful resolution which is not symptomatic of over-development. It must make a positive contribution to the local and historic context including listed building and conservation areas. 	Noted. These are matters that will be explored in full when an applicant comes forward to develop the site.
Individual	R1094	Other	<p>Fire Safety</p> <ul style="list-style-type: none"> • The designs from the beginning need to demonstrate compliance with the requirement for the highest standards of fire safety, in line with Policy D12 London Plan, which will be detrimental living conditions of the intended residents and fire safety features for fire service personnel (LP 2021 Policy D12: Fire Safety The provision of stair cores which are suitably sized, provided in sufficient numbers and designed with appropriate features to allow simultaneous evacuation) • There must be no single staircase for escape in any residential. • Every aspect of fire safety needs to be resolved from early feasibility, with a clear approach to the highest standards have been adopted in their entirety, without any contradictions between Building Regulations Approved Document B and the developing Fire Safety standards, as well as fire authorities, insurance company and all stakeholders have no unintended consequences on current or future building leaseholders. o The design of all residential shall not allow any unenclosed kitchens , as they are high risk spaces 	These important matters will be require to be addressed by any applicant developing a scheme for the site.
Individual	R1094	Other	<p>Inclusive Design</p> <ul style="list-style-type: none"> • The proposal should provide the best living conditions of the intended residents, with the highest standards of accessible and inclusive design (not just the minimum) (Policy D5: London Plan 2021) • All aspects to meet Building Regulations Approved Document M: should be resolved. <p>Building Regulations: Approved Document M 2015 edition, incorporating 2016 amendments, says: M4(2) Accessible and adaptable dwellings Section 2B: Private entrances and spaces within the dwelling: Circulation areas and internal doorways: Door and hall widths 2.22 d. A minimum 300mm nib is provided to the leading edge of every door within the entrance storey. (See diagram 2.3)</p>	These important matters will be require to be addressed by any applicant developing a scheme for the site.
Individual	R1094	Other	<p>Sustainable Development</p> <ul style="list-style-type: none"> • The proposal should have no detrimental impact on the living conditions of the intended residents, by failing to address the highest standards of thermal comfort for now and future generations due to the 	These important matters will be require to be addressed by any applicant developing a scheme for the site.

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			<p>impacts of climate change.</p> <p>The footprint of the proposed development should be designed to optimize passive design measures designed to the highest quality of daylight, ventilation, thermal comfort, acoustic comfort, which work as a balanced approach and do not contradict each other, to provide benefit for all. Each complete residential unit should avoid being deep plan, should have dual-aspect in all units of the living spaces and bedrooms to allow for cross ventilation throughout each unit. They should be of good floor to ceiling height, allow for natural passive ventilation, rather than completely sealed units, which really on expensive heavily serviced mechanical and electrical services. The quality of housing also needs to address the well-understood impacts of Post-COVID 19 context, by designing for adequate ventilation.</p>	
Individual	R1094	Other	<p>(LP 2021 Policy D6 Housing quality and standards and Policy 5.9 Overheating and cooling)</p> <ul style="list-style-type: none"> • Adequate demonstration of understanding the overheating risk from the start of the design process. The proposal must include measures to mitigate overheating risk, plus provide the full picture of the demand for cooling against a net zero carbon target. (London Plan 2021: Policy SI 2 Minimising greenhouse gas emissions; Policy SI 4 Managing heat risk) • The development must address health and social inequalities by addressing resilience to the effects of the climate emergency (LP 2021 GG6 designed to adapt to a changing climate, avoiding contributing to the urban heat island) • The TM59 overheating modeling must comply with CIBSE guidance on assessing and mitigating overheating risk, with modeling testing and the design being implemented to meet future projections of changes in climate, as the impacts of weather files future timelines for 2050s and 2080s (TM49). • The proposal cannot, as the Woodlands site does, only been tested to meet current climate conditions, and no provision has been included for future increase in neither heat-island temperature nor the impact on retrofitting cooling measures to mitigate this mal-adaption design. 	<p>There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.</p>
Individual	R1094	Other	<ul style="list-style-type: none"> • GHA guide requires avoidance of single aspect, as units are more likely to overheat as ventilation is less effective when there is no cross-ventilation, which requires windows or openings to be on the opposite sides of the dwelling. In addition, corner units, and articulations of angles in the facade are not considered dual aspect <p>All dwellings should be dual aspect and the plan form should not be based on central corridor provides access to the majority of dwellings.</p>	<p>These important matters will be require to be addressed by any applicant developing a scheme for the site.</p>
Individual	R1094	Other	<ul style="list-style-type: none"> • The GHA guide requires generous floor to ceiling height, to allow for fans now or in the future. High ceilings increase stratification and air movement and allow for the installation of ceiling fans. Occupied rooms to be designed 2.8m or more. 	<p>These important matters will be require to be addressed by any applicant developing a scheme for the site.</p>
Individual	R1094	Other	<ul style="list-style-type: none"> • The design brief from feasibility needs to identify the requirement of a net zero carbon development at an early strategic stage (in operation, 	<p>These important matters will be required to be by any applicant developing a scheme for the site.</p>

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			whole life cycle carbon achieved with no carbon offset fund) (LP 2021 Policy S1 2 Minimising greenhouse gas emissions) Urban Greening	
Individual	R1094	Other	• As an opposite to the Woodland site, which is an overdevelopment of the buildings and subsequent poor quality of green space, and space for play fails to contribute to improving Londoners' health by creating a healthy city , the development should play an active part in creating a healthy City (LP 2021 GG3 Creating a Healthy City)	Open space and play space requirements would be assessed at planning application stage as required by the relevant policies.
Individual	R1094	Other	• The proposal needs to recognise the existing value, such as addressing biodiversity, air quality, general health and wellbeing, (as described in GHA guide) And demonstrate measures to address the National Planning Policy Framework of Biodiversity Net Gain of 10%, as a minimum, plus calculate the Urban Green Factor (London Plan Policy G5) which would inform measures such as green roofs, to inform the qualitative aspect of green infrastructure.	Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites. This includes policies relating to Urban Greening Factor, biodiversity and air quality.
Individual	R1236	Other	I'm writing regarding the -12 Kennington Lane and Wooden Spoon House, 5 Dugard Way, SE11. This site ought to be redeveloped to provide more homes, but the development ought to be undertaken in such a manner that the development corresponds with both the immediate and surrounding neighbourhood and community. The proposal put forward by Lambeth Council does not respect the existing neighbourhood and community. Four categories There are four categories that the proposed development needs to be 1) Inappropriate design, layout and density affecting existing homes Little meaning consideration of the effects of the developments on existing people's homes in Lambeth Council's consultation. Both the height and bulk of proposed tall tower is to be almost immediately south of and overshadow existing homes as it would block daylight and sunlight. Existing homes to the north, east, and west of the tower are to be most severely affected.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1236	Other	Considerable high potential exists for noise and privacy issues from windows, balconies, and terraces both close to and which overlook existing homes.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2

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				'Amenity' and H5 'Housing standards').
Individual	R1236	Other	2) Impact on heritage buildings and conservation areas The impact of this development is harmful to the setting of heritage assets including the Grade II Old Fire Station and Grade II Old Court House (Jamyang Buddhist Centre) which will be negatively impacted by a large, bulky, tall building with 16 storeys or more having a harmful effect on Conservation Areas including Renfrew Road and Elliot's Row.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1236	Other	3) Impact on surrounding Kennington area The proposed tall tower will be against the character of the lower rise surrounding area. The tall tower will be outside of the Elephant and Castle tall buildings cluster. It will therefore stand out. This proposed development much like the Woodlands proposal sets a precedent for more tall buildings across Kennington. This proposed development is outside the areas identified in Lambeth Local Plan as being appropriate for such tall buildings.	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1236	Other	4) Traffic and transport Significant delivery, servicing, and parking issues exist for this development. The access will be off red route "A" roads at the already busy Kennington Lane, Kennington Park Road and Newington Butts junction. Traffic currently already tails back along Kennington Lane as far as Cotton Gardens at peak hours currently. No access to the development site from Dugard Way should exist as it is too narrow.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R1236	Other	5) Sustainability The sustainability of this proposed development is poor. It is an established fact that tall buildings have poor carbon footprints compared with lower rise buildings in construction materials and methods. Such tall buildings in conjunction with overshadowing of their neighbours' homes causing these existing building to need to use of additional artificial light and also affect existing sustainable heating systems. Kindly think at least twice about this proposal. This building should not be allowed.	There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy. Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land), an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-

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				use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building. London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG further require referable applications to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are both strongly encouraged. In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.
Individual	R1305	Other	I write to object to the proposed planning policy in relation to the above sites. [Site 7] The proposed redevelopment of the Jewson site, 6 – 12 Kennington Lane, is out of keeping with the local area and shows no respect for the exiting neighbourhood and community. It will negatively impact on nearby residents in Southwark.	Noted.
Individual	R1305	Other	The proposed tall tower is outside of the Elephant and Castle tall buildings cluster and as such would stand out and would be out of character with the low rise surrounding area.	The site allocations development plan document is an accepted means by which to identify locations suitable for tall building development. The 50m height identified is significantly lower than the 100m+ heights of the tall buildings within the Elephant cluster.
Individual	R1305	Other	The proposed tower would negatively impact on heritage assets close by, including the Grade II Old Fire Station and the Grade II Old Court House. Further it would negatively impact on nearby conservation areas, including Renfrew Road and Elliots Row.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1305	Other	The proposed tower is outside of the areas identified in the Lambeth Local Plan for tall buildings.	The site allocations development plan document is an accepted means by which to identify locations suitable for tall building development.
Individual	R1305	Other	The height and bulk of the proposed tower would negatively impact on available daylight and sunlight to surrounding properties, depriving many of any daylight.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to

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				daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1305	Other	The proximity of the proposed tower could raise privacy and noise issues from windows, balconies and terraces overlooking existing homes.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1305	Other	Access to the proposed development will add substantially and negatively to the existing traffic burden in the area, on a very narrow part of Kennington Lane, increasing the amount traffic generated pollution to the area.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R1305	Other	The redevelopment of the sites should provide homes in keeping with the local neighbourhood.	Noted.
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the</p>	Noted.

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			<p>consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>

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			<p>lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.</p>	
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> ● Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO₂e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO₂e output. - 4-5% of the worldwide total of CO₂e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution 	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			<ul style="list-style-type: none"> ● Steel Steel also has a significant impact on the environment: <ul style="list-style-type: none"> - It is CO2e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement: ● Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit “off-gas” toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. ● Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world's riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber. 	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> ● Overheating, caused by the proliferate use of glass and a high concentration of inhabitants ● Increasing carbon energy required to offset this through mechanical ventilation ● Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) 	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led</p>

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			<ul style="list-style-type: none"> • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise ‘skyscraper’ buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p> <p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p>
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council’s commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces,</p>	<p>Noted. Please refer to officer responses to previous points made as part of this representation.</p>

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			<p>'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <p>1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p> <p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p> <p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	
Individual	R1346	Vision Map	<p>I object wholeheartedly to this proposal. It is absolutely massive for the site and will have a hugely detrimental effect on all neighbouring properties.</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and</p>

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				sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1346	Vision	It's too big. I oppose it wholeheartedly.	Noted.
Individual	R1347	Sustainability Appraisal	Dedicated space for deliveries to be allocated from car storage space on adjoining roads. Reducing car storage space discourages private motor vehicle driving.	As stated in the proposed policy no vehicular access or servicing should be provided from Dugard Way and servicing on Kennington Lane is unacceptable. The policy will also be amended to reiterate Local Plan Policy 7 on servicing, which requires that servicing should take place off-street within the development site.
Individual	R1388	Vision	Improvements to Kennington Lane for pedestrians and cyclists would be very welcome as this is currently a heavily congested and polluted route on the boundary of the congestion charge zone. Also consider permeability of the site to enhance walking and cycling options through the site between Renfrew road, Hollyoak road and Kennington Lane.	Noted. Local Plan Policy Q1 on inclusive environments and Policy Q6 on urban design in the public realm should be addressed.
Individual	R1388	Site Allocation Policy	Surely site permeability for pedestrian and cycle access improves security and the opportunity to reconnect Dugard Way and Hollyoak Road should be seized.	Noted. Local Plan Policy Q1 on inclusive environments and Policy Q6 on urban design in the public realm should be addressed.
Individual	R1388	Vision Map	Where has the suggested suitability of a maximum 50m building height come from? Note that the maximum height of any adjacent property is 25m and this seems to conflict with the definition of the site as a non city central area and further it is outside of the Elephant and Castle Development area. This also conflicts with the decision to refuse planning permission for a tall building in a neighbouring development also on part of the former Lambeth Hospital site.	The exploring of options through the analysis of site constraints ultimately led to the indicative approach set out in the acknowledged document. That approach has informed the draft policy wording.
Individual	R1405	Vision Map	The stated heights for the existing buildings around this site are factually incorrect, and in most cases do not actually reflect the height of the main building element. This is obvious to see from visiting and from aerial views. The building to the right of Site 7 for example is 4 storeys and not 25M tall. The building to the left of Site 7 is a 3 storey building with a parapet and not 15M tall. There is no way it is appropriate for a 50M high building and anything approaching this height would be out of keeping and detrimental to the character of the area.	The heights have all been checked in the VU-city model to inform the next iteration of this site allocation.
Individual	R1411	Vision Map	I object to the inclusion of a tower in the design. I recognize that it is accessible on a main road but it will cast a shadow on the already many surrounding residences. It is on the edge of the essentially low-rise Water Tower estate and Kennington conservation area and is not within the neighboring Elephant & Castle development area. Whilst there are already towers at Hurley House and next door, this sets an unwelcome precedent in proliferating towers in this residential area.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the

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				BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1445	Vision Map	I strongly object this! As a local resident, this will affect not just me but the entire neighbourhood by completely changing the landscape and by setting a precedent for more and more disproportionate high density buildings. The design is simply inappropriate for this area and should not be considered at all. No building should be much higher than the surrounding area, specially given the nature of protected buildings in the area and the fact that this is outside the main cluster of tall buildings in the E&C area. This would also be erected in an area indicated by Lambeth Council as NOT appropriate for high towers.	Noted.
Individual	R1449	Site Allocation Policy	This site is not suitable for a tall building. This has already been established through the Woodlands planning process.	The site allocations development plan document is an accepted means by which to identify locations suitable for tall building development. The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1451	Vision	The plan is entirely disproportionate to the neighborhood. It will have a detrimental effect to the neighborhood that contains important conservation assets.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1451	Vision	Access in this area is poor and with the proposed density will become significantly worse.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use.
Individual	R1455	Vision	It's a small site on a very congested road. It's always busy because it's the edge of the congestion zone. To keep pedestrians safe from cars, lorries and bicycles the pavement should be wider, and to keep bicyclists safe, there should be a designated cycle lane. Each of those would make the site even smaller, because they can't be taken out of the roadway. Any development needs to respect existing homes on both sides of Kennington Lane. Your 'vision' doesn't even consider this.	As stated in the Vision, there are also opportunities to improve Kennington Lane for pedestrians and cyclists, for example through the widening of the footway outside the site. This and other options to improve the pedestrian and cycle experience will be explored as part of any development.

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Individual	R1456	Vision	I am not averse to the site being developed but it must be done with consideration to the surrounding neighbourhood and community. As with previous early plans (Woodlands Nursing Home and Knights Walk) this initial proposal has inappropriate design, and the layout and density will likely affect existing homes.	Noted.
Individual	R1456	Vision	The height and bulk of the buildings in the proposal will overshadow, blocking daylight and sunlight. Plus,	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this includes assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1456	Vision	there might be noise and privacy issues.	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R1456	Vision	This proposal would be better to follow the design of the Water Tower development - with low rise buildings that have space around them for light, privacy, and safe access.	<p>Noted. The Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use.</p>
Individual	R1456	Vision	Having a tall tower outside the Elephant and Castle "tower cluster" sets a dangerous and unnecessary precedent.	<p>Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.</p>

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Individual	R1456	Vision	This proposal seems to have more light industrial units rather than residential? If this is the case then it is essential that the cost of these must be kept low so that local people can afford to hire spaces.	Existing development plan policy requires that any development does not result in a net loss of industrial capacity (based on 65 per cent of the area of the existing builders' yard). With regards to affordable housing, the site allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites. This includes policies relating to affordable housing including different tenures and housing products which would be considered in detail at planning application stage.
Individual	R1456	Vision	Having such high and bulky buildings on this site could also have a harmful impact on the neighbouring heritage sites; Old Fire Station, Old Court House, Old Masters House, the Water Tower.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1456	Vision	This proposal has an emphasis on light industrial floorspace rather than residential, meaning there will be more traffic in and out of the site. Therefore, I do not feel it is appropriate to have delivery and servicing access on Kennington Lane. This is already a busy road as it is the boundary of the CCZ.	As stated in the proposed policy servicing on Kennington Lane is unacceptable. The policy will also be amended to reiterate Local Plan Policy 7 on servicing, which requires that servicing should take place off-street within the development site.
Individual	R1456	Vision	Access should not be from Dugard Way either as this is already too narrow.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.
Individual	R1456	Vision	Of course, changing the balance to more residential units without parking will redress this issue.	Noted.
Individual	R1458	Vision	Great vision for the area, and I look forward to the additional public realm works which will make the northern end of Kennington Lane better for cycling and pedestrians.	Comments are noted.
Individual	R1461	Vision	It appears to me that Lambeth's approach to this site is to make it an extension to the Elephant and Castle approach of building massive blocks which basically are sold off to either property developers or to people who can afford to pay circa £650000 for a 1 bedroom flat. As for Kennington Lane the traffic generally moves at snail's pace. How adding numerous units for sale would actually improve this I do not know. Is the signalised crossing expected to improve the traffic? It needs development but needs to be mindful of the local area and residents.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use. The Vision section will be amended to remove 'and for a signalised crossing to be provided on the Kennington Lane frontage' - as per the Policy text 'Depending on the location of any vehicular access points, an existing signalised pedestrian crossing may need to be relocated', rather than any additional crossing point be provided.
Individual	R1461	Vision Map	You accept that the site has 'sensitive residential neighbours' and then propose to allow the site to be used for a 50m tower block? What about the local heritage sites and conservation areas?	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an

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				unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1461	Vision Map	What about the overshadowing of existing low level homes?	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022).</p>
Individual	R1461	Vision Map	Does privacy for existing residents no longer apply when developers decide a site is of a good location to maximise profits?	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R1461	Vision Map	This area is a low rise urban type area and not similar in any way to the Elephant & Castle development site.	<p>The locality is varied in character with tall buildings in the Cottington Close Estate and at Cotton Gardens.</p>
Individual	R1508	Vision	The site is at present a mess and the right sort of re-development would improve the neighbourhood. But no more tall towers needed so close to those already at the Elephant.	<p>Noted.</p>
Individual	R1511	Vision	If new housing is built it should be entirely council housing, not affordable, which is not affordable for so many people. This area doesn't need more expensive housing. So much of it has already been built and remains empty.	<p>London Plan and Local Plan policies on affordable housing will apply to all the sites in the Draft SADPD. This includes Lambeth's tenure-split requirement of 70% low-cost rent and 30% intermediate affordable housing. Low-cost rent includes Social Rent. See London Plan policies H4, H5, H6 and Local Plan policy H2.</p>

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Individual	R1568	Vision	We need more commercial, not more housing	Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use.
Individual	R1574	Vision	Sunlight, space, less congested areas are important for mental health and well-being. Unless it is for 100% social housing, I feel this is a move to capitalise at the community's expense.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). There is not policy requirement to provide 100% affordable housing. The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to the support the examination of the London Plan and Local Plan.
Individual	R1575	Vision Map	This is absolutely crackers. A tall tower is against the character of our low rise neighbourhood. It is clearly a first step to trying to introduce towers from the Elephant to Vauxhall. Why is this being proposed when it is outside areas proposed in the Lambeth Local Plan as being appropriate for tall buildings?	There is no desire to establish a chain of towers linking Elephant and Castle to Vauxhall. The clusters in these localities contain tall buildings in excess of 100m+ and are distinctly different from the site allocation vision for this site. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1576	Site Allocation Policy	Tall tower will block sun and daylight for residents.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes

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				forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1578	Vision	I agree with the need to regenerate the site and for it to be used for residential purposes but find the scale, density and height of the proposal totally inappropriate to the neighbourhood.	Noted.
Individual	R1578	Vision Map	Proposed high rise tower is far too high and inappropriate in a low rise neighbourhood.	Noted.
Individual	R1579	Vision	I find that I do not agree with word of the so called vision. The site is not in a town centre so why treat it as of it is? The area is quite unsuitable for a high rise building and continued use as light industrial. The departure of Jewsons provides an opportunity to create something which is sensitive and proportionate for the area.	Noted.
Individual	R1579	Vision	An area which includes the Renfrew Road Conservation area which is adjacent to the site. And how can an ill placed high rise enhance the townscape? Quite simply it doesn't.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1579	Vision	And how can pavements be widened? Kennington Lane close to Newington Butts is already ridiculously narrow.	The widening of the footway that's referred to would be achieved through the reallocation of private land rather than by narrowing the carriageway, so should not impact on traffic congestion.
Individual	R1579	Acknowledged	There seems to be an assumption that access to this proposed development is not a major problem. I contest this. Kennington Lane close to the junction with Newington Butts and Kennington Park Road is very narrow. Traffic is frequently backed up all the way to Kennington Cross. How can the flow of construction vehicles be managed without causing huge and unacceptable delays to traffic?	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Development on site would therefore be unlikely to generate significantly more vehicular trips than the existing use. A Construction Management Plan would be secured by condition, which would manage the impacts of construction traffic.
Individual	R1579	Acknowledged	The use of Dugard Way is NOT an alternative. The road is narrow and the turn through the gates towards Wooden Spoon House is very tight. It is totally unsuitable for heavy plant equipment, which would also pose serious noise and emission issues for local residents.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.
Individual	R1579	Vision Map	The proposed high rise building would overshadow local homes, blocking daylight and sunlight.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in

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				<p>particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1579	Vision Map	There is also a serious risk of noise and privacy issues as homes are overlooked from windows, balconies and terraces.	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R1582	Vision Map	<p>I am writing too strongly object to proposed build of the blocks on the Jewson and Wooden Spoon House site in Kennington.</p> <p>I have a number of concerns.</p> <p>There will be more traffic going through the so called kennington triangle , my home is located on [redacted] and the traffic volume has built a lot more since the road was closed at Dante Road, having this new development will mean even more traffic , which currently speeds around the streets at an unacceptable and unsafe pace. The fact the Lambeth Council have not done anything about reducing the speeds around that rat run.</p>	<p>In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.</p>
Individual	R1582	Vision Map	The traffic alone should be reason enough not to have such a development, too many people.	<p>In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.</p>

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Individual	R1582	Vision Map	The tall tower will block daylight for local residents.	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1582	Vision Map	How this horrible looking development fits into the local area? The answer is that it doesn't. As far as I was aware it is a conservation area with listed buildings.	<p>The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.</p>
Individual	R1582	Vision Map	I believe people will be able to see into my house, creating privacy issues.	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R1582	Vision Map	Why do we have to have tall buildings in the area. Leave Kennington alone! Once you start with one massive tall building like the one being proposed, it will be the start of many, that surely cannot be allowed to happen.	<p>Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.</p>
Individual	R1583	Vision	It's a space that needs major improvememnt and to be put to better use	Comments are noted.
Individual	R1583	Acknowledged	Looks menacing and not welcoming at all.	Noted.

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Individual	R1584	Vision	I am not supportive of the current range of options/vision being looked at. If development has to happen (and I think it should) then it needs to be in a way that is appropriate and in keeping with the surroundings. The proposed 50m tower would be twice the size of any of the surrounding buildings and would be far too large. I would be opposed be any development on this sight above 4 or 5 stories.	Noted.
Individual	R1584	Vision	This would plunge the surrounding buildings (including one I live in) into darkness and drastically affect any natural light coming into our building and communal open spaces.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1584	Vision	I fear also that any development at the edge of the proposed sight would infringe on our privacy and be looking directly into our windows.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1584	Vision	This would also have a hugely detrimental affect on the Kennnington heritage area, with both the Old fire station and old court house (now the Jamyang Buddhist Centre) being completely overshadowed and dwarfed by such a huge developement.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable. Overshadowing of

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				heritage assets is not in itself a consideration but an overbearing or unduly dominant effect is.
Individual	R1584	Vision	The proposal for a large tower is not inkeeping with the local building types, we are not in a high rise area such as canary wharf or elephant and castle. It sets a dangerous precedent for other tall buildings to follow which would damage the heritage areas further.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development. The heritage impact of all future proposals will be assessed in detail through the planning applications process.
Individual	R1584	Vision	I worry also at the impact this will have on the surrounding area, Kennington lane is already a high traffic route, usually gridlocked on a daily basis between 8am-8pm so I worry how much worse the impact having a building site on it will have, this road would presumably also serve as the main access to the site.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1584	Vision	There is also the impact on local services such as schools, shops and buses that will be impacted.	The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the acknowledged for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure. In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use: <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.
Individual	R1584	Vision	I agree that development has to happen, and especially a need for affordable housing. But a proposal of 4/5 story buildings, in keeping with the local area, in a considered way, using brick to mirror local buildings and with open green spaces/increased tree cover would be far more agreeable than the current vision	As set out in the introduction to the Draft SADPD and the acknowledged documents for each site, the guiding principle for the draft site allocations is 'design-led optimisation of development capacity'. This is a requirement of London Plan policy – see London Plan policy D3. Local planning authorities are required to consider how best to optimise the development capacity of every site that comes forward for development. The rationale under-pinning the parameters for height and massing in the draft allocation for Site 7 is set out in the acknowledged document for that site, following the principle of design-led optimisation.
Individual	R1588	Vision	This is the sort of development that we don't need, it's a vision for dense housing, more pollution,	Noted.
Individual	R1588	Vision	car use,	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses

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				on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1588	Vision	stress on local services	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the acknowledged for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.</p>
Individual	R1588	Vision	and is an over development.	Noted.
Individual	R1588	Vision	It is on Kennington LANE, the clue is in the name. It's also over powering the lovely archetecture nearby, what about a park.	Noted
Individual	R1588	Vision	Honestly, been living in Kennington all my life and the local area is being turned into a concrete tunnel, with hi rise blocks either side of the road, you can't see the top of them from the car. SO use that meausr, if you can see the top from the car when passing at 30 mph, then that's high enough.	The assessment of tall building impacts from the view out of a motor car is not established best practice.
Individual	R1602	Vision	Inappropriate design and layout. Incongruent with the low rise character of the area.	The character of development along Kennington Lane is varied and includes post-war point blocks at Cotton Gardens and Estate and Cottington Close Estate.
Individual	R1602	Vision	Will make are noisy as many people will be moving here.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and

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				D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1602	Vision	It will have a detrimental effect on heritage assets and conservation areas.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1602	Vision	It will block day light from my flat which will be detrimental to my mental health.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1604	Vision Map	I object heavily to this proposed vision map - the tower will be huge and overbearing, this is a low rise/conservation area,	Noted. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1604	Vision map	and the effect on the heritage assets in the area (and the local residents) will be enourmous.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was

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				that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1605	vision map	This potential development is of serious concern for the area and its residents. The conservation area including the Old Fire Station and Court House is such a special area and one Kennington should be proud of. For this development to be proposed with no consideration for it and the surrounding area is extremely disappointing and insensitive.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1605	Vision map	Renfrew Road has already seen much increased congestion since the Knights Walk development adjoining the Section House and this development would only lead to more - something the narrow road would be unable to accommodate.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.
Individual	R1605	Vision map	I also see it as setting a precedent for more tall buildings among a predominantly low-rise area. For sure, developments are a necessity, but this is a poorly planned and disproportionate proposed development.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1607	Vision map	My family and I live on [redacted] next to this proposed development and we strongly object for the following reasons: 1) INAPPROPRIATE DESIGN, LAYOUT AND DENSITY ADVERSELY AFFECTING RESIDENTIAL AMENITY No consideration of effects on people's homes in Lambeth Council's acknowledged document Height and bulk of proposed tall tower would overshadow existing homes, blocking daylight and sunlight, with homes to north, east and west of the tower most severely affected	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1607	Vision map	Potential for noise and privacy issues from windows, balconies and terraces close to and overlooking existing residents	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the

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				site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1607	Vision map	Delivery and servicing access and parking issues for development – access off red route "A" roads at busy Kennington Lane, Kennington Park Road and Newington Butts junction.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1607	Vision map	No access should be from Dugard Way which is too narrow.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way.
Individual	R1607	Vision map	2) DETRIMENTAL IMPACT ON HERITAGE ASSETS AND CONSERVATION AREAS Harmful impact on setting of heritage assets including the Grade II Old Fire Station and Old Court House (Jamyang Buddhist Centre) which would be negatively impacted by a tall tower	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1607	Vision map	Large, bulky, tall building up to around 16 storeys high would have a harmful impact on Conservation Areas including Renfrew Road and Elliotts Row	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1607	Vision map	3) IMPACT ON SURROUNDING KENNINGTON AREA Tall tower will be against the character of the low-rise surrounding area. Will be outside of the Elephant and Castle tall buildings cluster and therefore stand out	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms.
Individual	R1607	Vision map	Sets precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1606	context	I consider the proposed height of the tower block to be inappropriate when put in context of much lower height housing which is adjacent. The height will cause shadowing and loss of light.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to

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				<p>sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1606	context	In addition, the height is inappropriate when put in the context of the conservation areas and listed buildings.	<p>The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.</p>
Individual	R1606	context	Access via Renfrew Road and Dugard Way is highly inappropriate as these roads will not cope with delivery vans, taxis, motorbikes etc, particularly when added to the potential increase in traffic if the development at Woodlands takes place.	<p>As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.</p>
Individual	R1606	context	The massing of buildings does not appear to allow for adequate external gardens.	<p>Development of this nature often has roof gardens and private balconies. Applicants will be expected to meet the amenity space policy requirements set out in the development plan.</p>
Individual	R1606	context	Tall buildings are environmentally inefficient.	<p>Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making.</p> <p>There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.</p>

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Individual	R1606	context	There is potential for increased noise and lack of privacy for existing residents.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1621	Vision	I believe this is overdevelopment of the site and will have a significant adverse affect on the local area.	Noted.
Individual	R1621	Vision	High rise blocks are inappropriate for this site and is out of keeping with heritage assets and the conservation area.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1621	Vision	The plans will further blight surrounding properties.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1624	Vision	Help the Cinema Museum to continue and thrive.	The development on the allocated site could result in new residents, workers and visitors to this area which indirectly could benefit the Cinema Museum. The cinema Museum falls outside of the site allocation plan. While site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use, they have to meet the relevant tests including: <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development.
Individual	R1624	Vision	No new towers.	Noted.

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Individual	R1624	vision map	There is no way a building 50 metres tall could ever be appropriate in this space.	Noted.
Individual	R1624	context	The Cinema Museum is an important neighbour, and deserves to be boosted and set off by this development. The wooden spoon has been precious for children, and free space for children should continue to exist here (a library? The one that was on walworth rd is no longer there)	The development on the allocated site could result in new residents, workers and visitors to this area which indirectly could benefit the Cinema Museum. The cinema Museum falls outside of the site allocation plan. While site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use, they have to meet the relevant tests including: <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development. With regard to the use of the Wooden Spoon House, the existing facilities for children are linked to the use of the site rather than public open space with playground. Should the existing use be relocated, there would be no requirement to provide a public playground or other community facilities on the Wooden Spoon House site. However it is noted that community use is required to be re-provided on the wider allocated site.
Individual	R1624	acknowledged	Kennington Land is unpleasant for pedestrians and dangerous for cyclists here, in both directions. widening the pavement here AND including a bikelane would make sense.	Noted.
Individual	R1624	acknowledged	Please respect the old workhouse and Cinema Museum.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1636	vision	I am concerned with regard the height of any towers proposed / planned with their associated impact of surrounding buildings, especially with regard impact of natural light on the low level buildings around.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant

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				guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1636	site-allocation-policy	I think it has the potential to have a significant negative impact on surrounding properties.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1636	vision-map	Height of any development should not exceed adjacent buildings and	Such an approach would not constitute an optimisation of the site capacity in accordance with London Plan Policy D3.
Individual	R1636	vision-map	light should not be affected	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1636	acknowledged	In the example given the tower is placed in the one place where it is likely to have the most impact on the adjacent buildings eg the old fire station	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best

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				practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.
Individual	R1636	acknowledged	Any tower is not in keeping with the area and would set a very worrying precedence for the Kennington area.	The character of the locality is varied with post-war point blocks at the Cottoington Close Estate and at Cotton Gardens.
Individual	R1636	sustainability-appraisal	There is very poor access to the site and little supporting infrastructure for further residential buildings.	The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide. In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1639	vision	it is not needed	As required by policy D3 of the London Plan, local planning authorities are required to consider how best to optimise the development capacity of every site that comes forward for development.
Individual	R1651	vision	Inappropriate design, density and density affecting existing homes. A 50m (150ft)/16 storey tall tower on Kennington Lane. There has been no meaningful consideration of effects on people's homes in Lambeth Council's consultation.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1651	vision	The height and bulk of proposed tall tower would be almost immediately south of and overshadow existing homes, blocking daylight and sunlight, with homes to north, east, and west of the tower most severely affected.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.

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				<p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1651	vision	<p>There is high potential for noise and privacy issues from windows, balconies and terraces close to and overlooking existing homes.</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R1651	vision	<p>Inappropriate design, layout and density affecting existing homes</p> <ul style="list-style-type: none"> • The proposed development is over intensive and aims to exploit a small patch of land. It shows little consideration for the negative effects it will have on our community and environment. 	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R1651	vision	<p>It will create new problems by increasing congestion, environmental pollution while reducing residents' access to fresh air and sunlight</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan</p>

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				policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1651	vision	<ul style="list-style-type: none"> • All developments should contribute to the area and its residents. There is no contribution to the character of the area from this over intensive development. 	Noted.
Individual	R1651	vision	<ul style="list-style-type: none"> • The proposed scale and landscaping will do nothing to enhance our neighbourhood. 	Noted.
Individual	R1651	vision	<ul style="list-style-type: none"> • Loss of privacy as the proposed siting of a tall building with 16 storeys or higher will look directly into existing homes. 	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1651	vision	<p>2) Impact on heritage buildings and conservation areas</p> <ul style="list-style-type: none"> • This is not a sympathetic proposal for land with historic, listed buildings and in a conservation area. This is an urban and not city dwelling therefore the plans should reflect this. 	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1651	vision	<ul style="list-style-type: none"> • This proposed development is a high price to pay for the small number of socially rented dwellings. 	Noted. Any planning application will be assessed against wider development plan policies which include measures to deliver wider public benefits, including supporting the economy, contributing towards social infrastructure, delivering new housing, as well as affordable housing.
Individual	R1651	vision	<p>3) Impact on surrounding Kennington area</p> <ul style="list-style-type: none"> • The tall tower is out of character with lower rise surrounding area. 	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms.
Individual	R1651	vision	<p>The tower is outside the Elephant & Castle tall buildings cluster.</p> <ul style="list-style-type: none"> • Just like the Woodlands proposal, this sets a precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings. 	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1651	vision	<ul style="list-style-type: none"> • It is virtually impossible to walk around Elephant & Castle at present due to wind tunnel effect without being blown along the pavement. I have seen elderly pedestrians struggling to remain upright. 	Depending on the scale of proposals submitted at planning application stage, wind mitigation assessment may form part of detailed assessment at application stage.
Individual	R1651	vision	<p>4) Traffic and transport</p> <ul style="list-style-type: none"> • There will be delivery, servicing, and parking issues for this proposed development. 	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.

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				Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1651	vision	<ul style="list-style-type: none"> • Inadequate parking and access to site is restricted to Renfrew Road and Dugard Way. 	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.
Individual	R1651	vision	<ul style="list-style-type: none"> • Access will be off red route "A" roads at the busy Kennington Lane, Kennington Park Road and Newington Butts junction. • Traffic tails back along Kennington Lane as far as Cotton Gardens at all times of the day. 	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1651	vision	<ul style="list-style-type: none"> • There should be no access to the development site from Renfrew Road and Dugard Way which is too narrow. 	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.
Individual	R1651	vision	<p>5) Sustainability</p> <ul style="list-style-type: none"> • Tall buildings are damaging, wasteful and outmoded. It's time to stop building them. 	There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.
Individual	R1658	Vision	Kennington Lane needs improvements for motorists. Thanks to restrictions around nearby roads and the congestion zone, KL is usually one endless traffic line waiting to get to Elephant & Castle.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1658	site-allocation-policy	Given the increased vehicular use of Gilbert Road/Renfrew Road, both of which are quite unsuited to it(vehicles often have to back up in order to pass), any large-scale increase in access would increase the problems enormously.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.
Individual	R1658	vision-map	The tall building would be totally out of place in this mainly low build area.	The character of the locality is varied with post-war point blocks at the Cottington Close Estate and at Cotton Gardens.
Individual	R1659	acknowledged	The comments on view 6 (Lambeth Palace from Victoria Tower Gardens) seem a little disingenuous. The Vu-City diagram makes it clear that the tallest part of the scheme would be clearly visible above	All of the views have been revisited. See updated acknowledged.

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			Lambeth Palace and would harm its silhouette. In general, the tallest part seems too high for the site. Post-covid and post-Brexit, we are in a new economic era and such massive over-development really is solving yesterday's problems, not today's. The tallest part should be cut by several storeys, to match the new development next door, on the former Brinks Mat site, and so that it is fully screened by Lambeth Palace when viewed from Victoria Tower Gardens.	
Individual	R1661	vision	Innapropriate design, layout and density adversely affecting current residential landscape - absolute lack of consideration given to surrounding residences.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1661	vision	A detrimental impact on the exisitig heritage sites and conservation areas.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1661	vision	The negative impact of a 16 storey tower on this site.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1661	vision	There is no comparable building of this height to justify the proposal; it is all low level residential / commercial zoning.	The built character of development along Kennington Lane varies greatly and includes post-war point blocks on the Cotton Gardens Estate and at Cottington Close Estate opposite the site. At 50m the height is significantly lower than the heights of the tall buildings at Elephant and Castle which often exceed 100m+

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Individual	R1661	vision	Such a building sets dangerous precedent for this area.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1665	vision	A residential high-rise would be great, it would fit in with the E&C skyline and provide much needed extra housing	Noted
Individual	R1696	vision	While fully supportive of appropriate redevelopment, the proposal presented here is not that. It represents a substantial over-development of the area and the proposed building height is far too high - out of keeping with the area, which is outside the Elephant and Castle development zone	The built character of development along Kennington Lane varies greatly and includes post-war point blocks on the Cotton Gardens Estate and at Cottington Close Estate opposite the site. At 50m the height is significantly lower than the heights of the tall buildings at Elephant and Castle which often exceed 100m+
Individual	R1696	vision	and likely to involve a serious negative impact on the local community in terms of shadow and views.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1696	site-allocation-policy	See previous comments on the vision.	Noted.
Individual	R1696	context	See previous comments on the vision.	Noted.
Individual	R1696	context-map	See previous comments on the vision.	Noted.
Individual	R1696	acknowledged	See previous comments on the vision.	Noted.
Individual	R1257	Other	I live on Tulse Hill estate. I am totally disturbed by the proposals for specifically Sites 18 and 19 along with Sites 7, 17, 20 and 21 and, to be honest, the whole plan!!! I feel that it's as if Lambeth Council is living in a dream and that as long as words like 'affordable housing' and 'flexible workspace' are used, you can carry on with simply carrying on. It's as if you have not noticed that we are living in a climate emergency!!	Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation

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		<p>All building needs to stop. There are alternative solutions!! Housing can be created by refurbishing buildings that already stand. We don't need more workspace - flexible or otherwise.</p> <p>These thoughts go along with my personal view that there has not been enough public consultation - we needed to see real plans. I am very disturbed by your ignorance - you ignore the state of the planet, you ignore the people, you ignore your responsibilities and - I just get the impression that as long as you can keep going with your plans, nothing else will matter. I object. Strongly!! I feel that</p> <ul style="list-style-type: none"> • there has been no adequate public consultation on these plans, • the buildings contravene Lambeth's own planning rules, • these developments overall would harm local communities and life itself. It's time to be creating a whole new way of living and some places are doing exactly that. Have you heard of Doughnut Economics? Have you even considered a complete change of plan that would be more suitable to a planet that needs help and a system that needs change? You are damaging the environment, destroying mature trees, breaking up communities and more. You seem to be blind, ignorant and/or stupid. I apologise if that sounds rude but - I'm freaking out here as our lives are in your hands!!! <p>Lambeth has been doing damaging processes similar to these for a long time. When will you start to care and act like reasonable, responsible people? How can you carry on making a total mockery of your own declaration of a 'climate emergency.'</p> <p>You claim to be a 'co-operative council' but it seems that there is no thought or vision for the community or for Lambeth as a whole. Please, hold some real consultations and think again. Please, take care of the people who voted you into position. Consider people and planet over profit. Stop working with only the property developers and start working for and with THE PEOPLE!!!</p>	<p>and adaptation. This includes transport policies seeking car-free development and encouraging active travel (Local Plan Policies T1-3 and T6); policies encouraging Urban Greening and the protection of open spaces (London Plan Policy G5 and Local Plan Policy EN1) and trees (Local Plan Policy Q10); and policies setting out requirements for sustainable design and construction (Local Plan Policy EN4) and improving air quality (London Plan SI1). A full list of development plan policies addressing climate change mitigation and adaptation can be found in Lambeth Local Plan 2021 Acknowledged Base document 'Topic Paper 7 – Climate Change'.</p> <p>These policies and guidance are in addition to the existing and emerging new requirements through the Building Regulations regime, such as the emerging Future Homes Standard. All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.</p> <p>Planning applications proposing development on this site will be subject to circular economy principles, which favour retaining and retrofitting over substantial demolition. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (e.g. development of 150 residential units or more or over 30 metres in height) an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable.</p> <p>Referable applications are also required to be accompanied by a comprehensive Whole Life Carbon assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, both these assessments are strongly encouraged.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p> <p>There is considerable demand for workspace in Lambeth, as set out in the Lambeth Local Plan 2021 acknowledged document 'Topic Paper 3 – Workspace'.</p> <p>Consultation on the Draft Site Allocation DPD was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local</p>
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				<p>Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.</p> <p>The Draft Site Allocations DPD aligns with Lambeth Local Plan 2021. The approach to the SA DPD is also consistent with that set out in section 11 of the NPPF 2021 on making effective use of land, and paragraph 23 on allocating sufficient sites to deliver strategic priorities of the area. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10 of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies.</p> <p>Comments noted and addressed above.</p>
Individual	R0019	Acknowledged	I worry about allowing buildings in excess of about 40 metres here.	Noted.
Individual	R1706	Vision	This building is hugely detrimental to the victorian buildings surrounding. There is a large workforce working from home and this will reduce light considerably into the Old Fire Station and Buddhist centre. This are listed buildings and part of Londons rich history.	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1706	vision	There are far too many high rise blocks which don't provide enough 'living' space for human beings. 'Crowded rat syndrome' springs to mind. People need quality properties and developers should look at Elephant and castle which needs regeneration urgently!	Any proposed development that comes forward would be required to provide high quality of accommodation as required by the relevant policies including the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1706	vision	development should compliment the area not smother it! There has been plenty of new buildings in the Renfrew Road area which are in keeping with the surrounding area and good quality, making this area	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site

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			suitable for families. Blocks of flats are a plenty just down the road in Battersea, This proposed block is completely out of character for Kennington and once the precedent has been set, what will follow?	specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1706	vision	More and more high rises? please consider the mental health of all of the londoners that live in this area now as well as the impact on their property values , its just far too much and too big!	Noted.
Individual	R1721	vision-map	I absolutely do not agree with the proposal for this site. The height of the tower is very much out of proportion with nearby buildings, especially the heritage assets and local conservation areas.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1721	vision	Noise and privacy issues are of great concern,	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1721	vision	as is the clear impact on access to daylight.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.

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Individual	R1721	vision	The access issues on nearby main roads could be extremely disruptive (Kennington Lane and Newington Butts already have severe congestion) and Dugard Way is not equipped to deal with additional traffic.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use. As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site
Individual	R1721	vision	The location is significantly outside of the Elephant and Castle tall buildings cluster and should neither extend it or be used as a stepping stone or precedent for further tower block development between E&C and Vauxhall. I vehemently oppose the proposal and advise that it be fundamentally reconsidered and a more sensitive and proportionate plan put forward.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1728	vision	Kennington Lane is one of the most dangerous streets for pedestrians and cyclists. Pedestrians are rarely given the right of way whilst cars use it to race to/from Elephant and Castle to Vauxhall Bridge Road. The lanes are also super narrow and dangerous to cyclists. Increasing the density of the street will only exacerbate the problem.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1728	context	With the site enclaved next to a number of conservation sites and under a number of strategic views. It's of paramount importance that the proposed volumes and heights of any future development remain consistent with this immediate neighbours.	Noted.
Individual	R1728	site-allocation-policy	As important as it's to provide affordable housing in the area, the site does not have the capacity to sustain a tall tower.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10 of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1728	site-allocation-policy	Renfrew Road is a narrow street leading to a school and which is already used for 'rat racing'. Dugard Way is even smaller.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.
Individual	R1728	site-allocation-policy	Kennington Lane has no additional space.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore

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				expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1728	site-allocation-policy	There will be a severe impact to surrounding neighbours.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1728	site-allocation-policy	This is not to mention the impact on the surrounding conservation areas.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1728	site-allocation-policy	And the precedent that it will create to make all of Kennington Lane full of tall buildings.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1728	site-allocation-policy	The volumes should be consistent with current adjacent heights and also protect the strategic views.	Noted.
Individual	R1728	acknowledged	There area definitely can do with improvement. However why the need for a 50m tower. Keep the design along the lines of existing buildings.	Noted.
Individual	R1728	vision-map	Why add a 50m eyesore to a very busy area where the average height is closer to 15m. It will add pressure to the already congested environment,	The built character of development along Kennington Lane varies greatly and includes post-war point blocks on the Cotton Gardens Estate and at Cottington Close Estate opposite the site.
Individual	R1728	Vision-map	be detrimental to the local conservation areas.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable. Overshadowing of heritage assets is not a consideration but an overbearing of unduly dominant effect is.
Individual	R1728	Vision-map	And put pressure to allow further towers in area not designed for it.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site

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				specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1745	vision	It's unsuitable for the location	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1745	vision	and will overshadows the character of local buildings such as the old fire station	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable. Overshadowing of heritage assets is not a consideration but an overbearing of unduly dominant effect is.
Individual	R1748	vision	Far too tall.	Noted.
Individual	R1748	vision	Great impact on existing homes.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1748	vision	Affects nearby conservation area.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.

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Individual	R1749	vision	Should ideally have an active frontage and	Active frontages are usually associated with town centre uses such as retail and food and drink related uses. The site is not located in a designated town centre and therefore there is no requirement to provide active frontage. However, the policy does recognise that good natural surveillance to both Kennington Lane and Dugard Way must be provided.
Individual	R1749	vision	building should follow the original street line	The provision of improved public realm is considered a priority.
Individual	R1749	vision-map	A 50m high building is totally inappropriate for this context. The redevelopment presents an opportunity to rebuild the scale of the street leading up to the more intense development at the Elephant and Castle, creating a greater continuity along the street frontage to repair the existing broken urban fabric.	Noted. The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1749	Vision-map	A tall building would be outside the Elephant & Castle cluster and would weaken the continuity of the street and is contrary to the overarching 'gentle densification' policy.	The current street frontage on Kennington Lane lacks any continuity. The site allocation anticipates the reintroduction of an building line and active frontage which will be a significant improvement on existing.
Individual	R1749	Vision-map	The new frontage should be in line with the adjacent buildings - 4-6 stories and the scale should be broken down further with multiple entrances/street activity to help absorb the scale of the existing Elephant and Castle towers to make a soft transition to the still dense but smaller scale buildings typical of Kennington. Furthermore, I note that the heights on the attached map are clearly incorrect and seem to be based on an assumption that 1 storey = 5m, when 3m is more realistic.	The indicative approach in the Reg 18 acknowledged base showed one possible approach where the building line was set back to create more public realm along Kennington Lane. Indicative approaches are not proposals and are prepared solely to gain an understanding of potential site capacity. The Vision map in draft policy indicates a widened footway and an 'active frontage' to Kennington lane. The vision map / policy does not dictate a precise building line to Kennington Lane. It is considered that matter is best explored at application stage. The heights have all been checked in the VU-city model to inform the next iteration of this site allocation.
Individual	R1749	Vision-map	The building on the corner of Renfrew Road and Kennington lane is 3 storeys high, maybe 10-11m high allowing for the tall GF and the parapet. On the other side, the 'Snap Fitness' building is 6 storeys high - probably 18m given it is recently constructed social housing, not 25m as stated.	The heights have all been checked in the VU-city model to inform the next iteration of this site allocation.
Individual	R1761	vision	The height of 50m is far too high for this site and will have a hugely detrimental impact on the current developments.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').

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Individual	R1761	vision	The design, layout and density is inappropriate and will have an adverse impact on the residents currently living in the area.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1761	vision	The development will block light.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1761	vision	The site is far too small for the type of development that is planned.	Noted.
Individual	R1761	site-allocation-policy	Yes, as a sensitive neighbour I am hugely concerned about the proposed height of the building. It will clearly have an unacceptable impact on existing neighbours adjacent to the site, including overlooking,	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').

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Individual	R1761	site-allocation-policy	loss of daylight, overshadowing	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1761	site-allocation-policy	and noise pollution.	<p>The impact of any demolition and construction will be considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming forward, as required by Local Plan Policy T7.</p>
Individual	R1761	site-allocation-policy	The buildings will be far too close together and will over shadow our building. It will also reduce our quality of life by reducing daylight.	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant</p>

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				guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1761	acknowledged	There is no consideration of effects on people who live in the 15m and 18m tall buildings in the Water Tower development.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1764	site-allocation-policy	The 50m height and the bulk of the tower would affect existing buildings, overshadowing them and blocking light,	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1764	site-allocation-policy	as well as raising issues of privacy.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').

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Individual	R1764	site-allocation-policy	As with the proposed Woodlands development, a tall tower is being considered for a conservation area and and for an area of low rise housing.	Noted.
Individual	R1766	vision	The Jewson site should be redeveloped to provide more homes, but the development should be done in such a way that the development fits in with the surrounding neighbourhood and community. The proposal put forward by Lambeth Council doesn't respect the existing neighbourhood and community.	Noted.
Individual	R1766	site-allocation-policy	Impact on heritage buildings and conservation areas →Harmful to the setting of heritage assets including the Grade II Old Fire Station and Grade II Old Court House (Jamyang Buddhist Centre) which would be negatively impacted by a tall tower.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1766	site-allocation-policy	A large, bulky, tall building 16 storeys high or higher would have a harmful effect on Conservation Areas including Renfrew Road and Elliot's Row.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1766	site-allocation-policy	3) Impact on surrounding Kennington area The tall tower will be against the character of the lower rise surrounding area. The tall tower will be outside of the Elephant and Castle tall buildings cluster and therefore stand out.	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms.
Individual	R1766	site-allocation-policy	Like the Woodlands proposal, this sets a precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1766	context	Traffic and transport There will be delivery, servicing, and parking issues for development.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1766	context	The access will be off red route "A" roads at the busy Kennington Lane, Kennington Park Road and Newington Butts junction. Traffic tails back along Kennington Lane as far as Cotton Gardens at peak hours currently.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.

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Individual	R1766	context	There should be no access to the development site from Dugard Way which is too narrow.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.
Individual	R1766	acknowledged	While the Jewson Yard and the disused Christ the redeemer building are unsightly and need to be replaced and there is a need for more housing, a huge tower development is not in keeping with this site, it needs to be 10 -12 storeys only.	Noted
Individual	R1766	acknowledged	Furthermore, there isn't the infrastructure in the area for more residents, the doctor's surgery in Kennington Lane has closed, there aren't enough schools, parks and open spaces for families and a densely populated building will invite more anti-social behaviour and delivery traffic.	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the acknowledged for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.</p>
Individual	R1766	sustainability-appraisal	Tall buildings have poor carbon footprints compared with lower rise buildings in construction materials and methods. When combined with overshadowing of neighbours' homes, causing them to use more artificial light, and affecting existing sustainable heating systems, the sustainability of the proposed development is likely to be poor.	There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.
Individual	R1766	acknowledged	The tall tower will be against the character of the lower rise surrounding area. The tall tower will be outside of the Elephant and Castle tall buildings cluster and therefore stand out. Like the Woodlands proposal, this sets a precedent for more tall buildings across Kennington and is outside areas identified in Lambeth Local Plan as being appropriate for tall buildings.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.

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Individual	R1767	site-allocation-policy	I object strongly to the proposed density of the site. This can only be accomplished with the proposed tall building and this is not at all compatible with the surrounding areas.	Noted
Individual	R1767	site-allocation-policy	Such a building will establish a precedent for other tall buildings in the area,	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1767	site-allocation-policy	will block light into my lounge and bedroom and will mean that	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1767	site-allocation-policy	my currently unrestricted view will be blocked.	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). While impact on outlook would be assessed, the loss of private views is not a material planning consideration.</p>
Individual	R1767	site-allocation-policy	Such a tower and such density also is not consistent with the heritage nature of the surrounding area.	<p>The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an</p>

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				unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1767	site-allocation-policy	Finally, Kennington Lane traffic is already a nightmare at certain times of the day.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1767	site-allocation-policy	Such density can only increase the strain on already overtaxed infrastructure.	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the acknowledged for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.</p>
Individual	R1772	site-allocation-policy	Proposal of tall building at up to 50m would be out of character of current low rise developments at Kennington. Close and overlooking windows will result in loss of privacy to adjacent residential property.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1775	vision	The tall tower is not in line with current policy and is not in an area identified in the Lambeth Local Plan 2021	Site Allocations policy documents are an accepted means of identifying locations suitable for tall building development.
Individual	R1775	vision	Inappropriate size compared with its immediate context which is 2 to 5 storey buildings. Far too dense and over developed. Not in keeping with the area	The character of development along Kennington Lane is highly varied with post-war estates and Victorian properties. Cotton Gardens Estate and Cottoing Close Estate both have point blocks.

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Individual	R1775	vision	a. Next to an area designated in the Elephant and Castle Opportunity Area Framework as being suitable for lower rise development. Sits outside of the opportunity area. Developers are trying to creep their way into residential areas.	Noted.
Individual	R1775	vision	No tower developments currently built in the Elephant and Castle Opportunity Area have had existing homes on their north side so close to the development site. Will lead to loss of daylight and sunlight for existing residents.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1775	vision	Harmful impact on setting of heritage assets including the Old Fire Station and Old Court House	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1775	vision	Over developed site and height would have a harmful impact on conservation areas	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1775	vision	Not a plan to help the housing crisis. Just a money making scheme for developers.	Landowners and developers are entitled to bring forward proposals for development on privately owned land, so long as this is done in a way consistent with the policies in the development plan for the area. The Council's role, as Local Planning Authority, is to bring forward appropriate development plan policies (including through the SADPD), and to assess planning applications against these policies. Private sector land-owners

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				and developers have an important role to play in helping to deliver regeneration and sustainable growth in Lambeth through appropriate and sustainable development of their assets.
Individual	R1775	context	High rise buildings in the Elephant and Castle opportunity area are a replacement of 1960s towers which needed modernising (Haygate estate). This proposal isn't to replace similar existing buildings. It's just for developers to make money at the expense of the lives/welfare of local people.	Landowners and developers are entitled to bring forward proposals for development on privately owned land, so long as this is done in a way consistent with the policies in the development plan for the area. The Council's role, as Local Planning Authority, is to bring forward appropriate development plan policies (including through the SADPD), and to assess planning applications against these policies. Private sector land-owners and developers have an important role to play in helping to deliver regeneration and sustainable growth in Lambeth through appropriate and sustainable development of their assets.
Individual	R1775	context	<p>- The proposed tower is substantially out of scale compared with its immediate context which is 2 to 5 storey buildings.</p> <p>- The site is also next to an area designated in the Elephant and Castle Opportunity Area Framework as being suitable for lower rise developments.</p> <p>Tall buildings in the Elephant and Castle Opportunity Area serve as a modernisation of 1960s buildings (Haygate Estate). This suggestion for the Jewson site is not to modernise an existing tall building or estate. It's just an attempt by property developments to earn a profit at the expense of existing residents in the area and ruin the local community.</p> <p>The tower is out of scale compared with its immediate context of 2 to 5 storey buildings. The Elephant and Castle Opportunity Area Framework suggests the area next to this site is suitable for lower rise development.</p> <p>Harmful impact on setting of heritage assets including the fire station and court house.</p> <p>Large, bulky, tall building would have a harmful impact on conservation areas</p>	Noted. The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1775	acknowledged	<p>Acknowledged is misleading</p> <p>- The Acknowledged Report doesn't show that for much of the day the tall tower would devastate the sunlight and daylight for existing homes to the north and west.</p> <p>- Misrepresentation of effects on the view between the Old Courthouse and the Old Fire Station.</p> <p>- The tall tower is barely visible behind the Old Courthouse which wouldn't be the case.</p> <p>- Access to the proposed development is hardly mentioned. However this is a site located at a junction where there's heavy traffic down Kennington Lane.</p> <p>- There can be no access to the development via Dugard Way.</p> <p>- The acknowledged claims that the indicate approach has been "tested at the level of general massing and height to ensure acceptable impacts in relation to daylight and sunlight..." but there is no acknowledged presented that this has been the case.</p>	Noted. The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable. Daylight and sunlight related acknowledged has been made public. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.

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				design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide. As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.
Individual	R1775	Site Allocation Policy	Potential noise and privacy issues from balconies and flats	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1775	Site Allocation Policy	Not really affordable. Affordable for wealthy people. Nothing in it for the local community or the Council.	London Plan and Local Plan policies on affordable housing will apply to all the sites in the Draft SADPD. This includes Lambeth's tenure-split requirement of 70% low-cost rent and 30% intermediate affordable housing. See London Plan policies H4, H5, H6 and Local Plan policy H2.
Individual	R1775	Site Allocation Policy	Delivery and servicing access and parking issuesnoise from the refuse	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1775	Site Allocation Policy	the tall tower would devastate the sunlight and daylight for existing homes. Sets precedent for more tall buildings across Kennington which stated as being appropriate for tall buildings	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10 of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the local plan and associated London Plan policies. The indicative approach has been informed by site constraint analysis and has been

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				<p>tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1777	vision	It will excessively dominate & shadow losing light to local residents.	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1777	vision	2. Traffic in this area is already challenging; too many new dwellings will bring excessive traffic (eg deliveries) clogging up already congested roads, reducing cycle/pedestrian safety & increasing air pollution.	<p>In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.</p>
Individual	R1777	vision	3. Any proposal should be sustainable in its design and through - life	<p>There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation</p>

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				and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.
Individual	R1777	vision	4. The neighbourhood is full of historic and listed buildings. These should not be overshadowed in order to preserve their character	Overshadowing of heritage assets is not a consideration but an overbearing of unduly dominant effect is.
Individual	R1777	vision	5. The concept of linking Dugard Way to Kennington lane directly creates a rat-run hugely changing the nature of the watertower community	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.
Individual	R1780	vision	Area is already built up and no new developments will be of benefit to the area and existing residents.	Noted.
Individual	R1785	vision	The vision is good - more homes etc, the detail is bad	Comments are noted. The details in the Draft SADPD is underpinned by the extensive acknowledged documents available online.
Individual	R1789	vision	Sigh, yet another massive inappropriate block. Why? Doesn't recent acknowledged show that lower rise, well ventilated, well landscaped low cost housing is what the borough is clamouring for? And since when has this Council's planning department ever approved "high quality design"? Just because it's on the edge of Southwark's hideous and over-built high rises at the Elephant, doesn't mean that this predominantly low rise area of Lambeth should follow suit.	Lambeth's independent Design Review Panel plays an important role scrutinising schemes at design development stage to ensure that they deliver high design quality.
Individual	R1789	vision	The pavements are wide enough as they are - don't clog up the congestion even more on Kennington Lane. There is ample opportunity to cross. "signalised"? it's not a verb.	The widening of the footway that's referred to would be achieved through the reallocation of private land rather than by narrowing the carriageway, so should not impact on traffic congestion. The reference to a signalised pedestrian crossing refers to a pedestrian crossing point that is controlled by traffic signals (aka traffic lights).
Individual	R1789	vision-map	Plenty. Why build something so tall given the volume of "sensitive residential neighbours"? Why can't you develop property that people of Lambeth want to live in? ie houses. Plenty. But to be brief - why envision a development that impacts on so many "sensitive residential neighbours"? Why can't you build what people of Lambeth want to live in - good quality low rent houses, not yet another high rise tower with all the social and environmental impact that would bring. I don't see a vision, I see wilful blindness.	The mix of homes will be fully considered at the time a planning application is brought forward on the site. Local Plan Policy H4 'Housing size mix in new developments' will apply, which acknowledges the need for family accommodation, in particular family-sized affordable units. there is no policy requirement to provide houses rather than flats. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of

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				enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1792	Site Allocation Policy	This is a huge improvement on the current use of the site providing much needed low energy consumption modern housing to the area for the next generation wishing to live in zone one of one of the greatest metropolises in the world. It would be even better if even more dense use of the space was used to maximise its value. We need loads more homes at every echelon and this is a great start; let's have lots more, please don't listen to the complaints of those with homes who campaign against building homes for those without homes.	Noted.
Individual	R1792	vision-map	Very good	Noted.
Individual	R1801	vision	Respectfully, I think this is a bad idea which causes great detriment to the current residents. Below I will outline the reasons: 1) Inappropriate design, layout and density affecting existing homes The current proposal would construct a building which is too big and too high, and the nearby homes would 1) no longer have exposure to sunlight,	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1801	vision	and 2) lose all privacy as residents on higher floors of this new building could see current residents with ease.	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>

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Individual	R1801	vision	2) Impact on heritage buildings and conservation areas Harmful to the setting of heritage assets including the Grade II Old Fire Station and Grade II Old Court House (Jamyang Buddhist Centre) which would be negatively impacted by a tall tower A large, bulky, tall building 16 storeys high or higher would have a harmful effect on Conservation Areas including Renfrew Road and Elliot's Row	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1801	vision	3) Impact on surrounding Kennington area The proposed design is too large compared to the surrounding areas and disrupts the aesthetic of the surrounding lower rise areas. It also is outside the areas identified by the Lambeth Local Plan appropriate for larger buildings.	The 50m height is significantly lower than the 100m+ heights of the tall buildings within Southwark's tall building cluster. Given the significant height difference, and taking into account the views tested, the impact of 50m is considered acceptable in townscape terms.
Individual	R1801	vision	4) Traffic and transport There will be delivery, servicing, and parking issues for development. The access will be off red route "A" roads at the busy Kennington Lane, Kennington Park Road and Newington Butts junction. Traffic tails back along Kennington Lane as far as Cotton Gardens at peak hours currently.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1801	vision	There should be no access to the development site from Dugard Way which is too narrow.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.
Individual	R1801	vision	5) Sustainability Besides the poor carbon footprint that tall buildings have, the proposal makes little to no mention of ACTIONABLE approaches that actually help in conservation or optimising energy usage.	Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.
Individual	R1801	vision	The construction would also contribute to air and noise pollution. Without these concerns being addressed, I cannot in good conscience support this proposal.	The comments are noted. The impact of any demolition and construction will be considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan Policy T7 and Local Plan Policy T7) to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming

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				forward, as required by Local Plan Policy T7. At planning application stage, the London Plan policy D14 'Noise', London Plan policy SI 1 'Improving Air Quality' and Lambeth's Air Quality Action Plan would apply. They requires mitigation measures to be incorporated to ensure that that there is no unacceptable impact with regards to noise or air quality including during construction phase.
Individual	R1808	vision	The vision is good. I am just concerned about the actual volume and what effects will it bring to the existing infrastructure and the neighbourhood	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the acknowledged for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.</p>
Individual	R1808	Site Allocation Policy	As a resident in the area, I am directly affected by the development including daylight, safety, noise level and change of population density.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1808	Site Allocation Policy	It would also impact the surrounding heritage buildings and conservation areas.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has

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				subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1808	Site Allocation Policy	Not to mention transport. The roads are often busy and with the extension of northern line, the underground is being pushed to its limits.	Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected impacts on local public transport.
Individual	R1808	vision-map	a low rise development would be appropriate instead of a tall one	Noted
Individual	R1808	sustainability-appraisal	There is not enough acknowledged to support how the development is going to preserve the existing environment and heritage sites	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable. It will be up to applicants coming forward with detailed schemes to provide comprehensive heritage impact assessments.
Individual	R1808	sustainability-appraisal	High rise buildings are not sustainable.	There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.
Individual	R1808	context	So much to preserve.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1808	context	Worried if a high density development is introduced, how it would affect the safety. I was mugged in the neighbourhood, lots of antisocial behaviours around especially during summer time.	Safety and designing out opportunistic crime would be assessed at application stage as required by policy Q3.
Individual	R1808	context	I am really concerned about the loss of sunlight in my building	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing

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				neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1815	Vision	The vision sounds great - but whether it turns out to be great depends entirely on what is deemed to be 'appropriate in this immediate context'. For example, I would not consider it 'appropriate' to erect a 49m high tower (even if sited close to the Kennington Lane boundary) with subsidiary towers of 37m, 27m, 21m and 18m on a site of 0.67ha where the existing buildings surrounding the site vary between 10,11,13, 15, 15, 16, 18, 19, 19, 20 and 25m in height. Improvements in the townscape and street scene would be welcome but would not be a sufficient benefit to compensate for the detrimental effects such a development would have on the existing residents of Lambeth living in predominantly low rise developments.	Noted. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1815	Vision	I am all for providing more homes in Lambeth, but do not think these should be provided to the detriment of existing residents who would suffer loss of daylight and sunlight,	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1815	Vision	overlooking and noise.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the

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				site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1816	Vision	Way too large-scale and will destroy the character and quality of the surrounding community	The locality of Kennington Lane is a varied one of mixed character with post-war point blocks at Cottington Close Estate and Cotton Gardens Estate
Individual	R1824	Vision	The site is too small for the density of development proposed. This area does not need any more high rises like those clustered around the Elephant and Castle	The locality of Kennington Lane is a varied one of mixed character with post-war point blocks at Cottington Close Estate and Cottonn Gardens Estate. At 50m the indicated height is significantly lower than the tall buildings at Elephant and Castle which are often 100m+
Individual	R1824	Vision	with problems of overshadowing and	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1824	Vision	reduction of privacy for those residents already here.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').

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Individual	R1827	Vision	I am concerned that this will be seen as another opportunity to build a tall residential tower which will further undermine the existing character of Kennington as a low rise residential area. The drive for towers seem to be caused by the desire of developers to sell units to the overseas wealthy as investments.	The locality of Kennington Lane is a varied one of mixed character with post-war point blocks at Cottington Close Estate and Cotton Gardens Estate
Individual	R1828	Vision	The scheme is far too dense, the additional traffic on Kennington lane which is already overburdened as it's at the edge of the congestion charge zone, will make travel intolerable.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1828	Vision	We don't want anymore tall buildings towering over and overwhelming a low rise residential area.	The locality of Kennington Lane is a varied one of mixed character with post-war point blocks at Cottington Close Estate and Cottonn Gardens Estate
Individual	R1830	Vision Map	I do not believe that a 50m building is in keeping with the local area. The tower will be outside the cluster of buildings directly around the Elephant and Castle area,	The locality of Kennington Lane is a varied one of mixed character with post-war point blocks at Cottington Close Estate and Cottonn Gardens Estate
Individual	R1830	Vision Map	and will set a concerning precedent for the future expansion of high-rise developments along Kennington Lane.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1830	Vision Map	The Lambeth Local Plan does not identify this site as being appropriate for such a building, and I object to the developer going against this.	Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. The site specific nature of a site allocation would not set a precedent for future tall building development.
Individual	R1830	Vision Map	The height and bulk of proposed tall tower would be almost immediately south of and overshadow existing homes, blocking daylight and sunlight, with homes to north, east, and west of the tower most severely affected.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.

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Individual	R1830	Vision Map	Furthermore, there is high potential for noise and privacy issues from windows, balconies and terraces close to and overlooking existing homes.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1832	Vision	I think the general plan to redevelop the site to improve frontage to a key street is a good idea.	Noted.
Individual	R1832	Vision	However that doesn't mean slap an inappropriate tower on the site. Kennington and the immediate area of Site 7 are primarily low rise.	The locality of Kennington Lane is a varied one of mixed character with post-war point blocks at Cottington Close Estate and Cottonn Gardens Estate
Individual	R1832	Vision	Any new building should be no higher than the buildings immediately adjoining the site, and also take into account the large number of conservation sites and listed buildings locally.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1832	Vision	The new works near the gas meters in Vauxhall are a bad example of what could be built there, they are too big and ruin the the sense of the neighbourhood. Certainly not suitable for an elephant & Castle style tower.	Noted
Individual	R1832	Vision	The impact on adjoining existing housing will be too great, particularly light.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant

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				guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1837	Site Allocation Policy	I am not against the redevelopment of the site but I am concerned how a 50m plus building would fit with current buildings and would prefer a lower max height	Noted.
Individual	R1850	Acknowledged	The proposal put forward by Lambeth Council doesn't respect the existing neighbourhood and community. The height and bulk of proposed tall tower would be almost immediately south of and overshadow existing homes, blocking daylight and sunlight, with homes to north, east, and west of the tower most severely affected.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1850	Acknowledged	Harmful to the setting of heritage assets including the Grade II Old Fire Station and Grade II Old Court House (Jamyang Buddhist Centre) which would be negatively impacted by a tall tower.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1850	Acknowledged	A large, bulky, tall building 16 storeys high or higher would have a harmful effect on Conservation Areas including Renfrew Road and Elliot's Row.	The acknowledged document to support the draft site allocation included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. The indicative approach has subsequently been revisited and the assessments re-done. Again, the findings are that the heritage impacts are acceptable.
Individual	R1850	Acknowledged	The tall tower will be against the character of the lower rise surrounding area.	The locality of Kennington Lane is a varied one of mixed character with post-war point blocks at Cottington Close Estate and Cottonn Gardens Estate
Individual	R1850	Acknowledged	There will be delivery, servicing, and parking issues for development.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.

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				Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1850	Vision Map	There will be delivery, servicing, and parking issues for development. The access will be off red route "A" roads at the busy Kennington Lane, Kennington Park Road and Newington Butts junction. Traffic tails back along Kennington Lane as far as Cotton Gardens at peak hours currently.	In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Vehicular movements generated by the development are therefore expected to relate to servicing and disabled parking only, and therefore are not expected to be significantly greater than the existing use.
Individual	R1850	Vision Map	There should be no access to the development site from Dugard Way which is too narrow.	As stated in the proposed policy 'No vehicular access or servicing should be provided from Dugard Way'. The 'indicative servicing route' shown on the plan on p135 will be amended to not extend to Dugard Way. Renfrew Road should therefore not experience increased traffic associated with the development of this site.
Individual	R1850	Sustainability Appraisal	Tall buildings have poor carbon footprints compared with lower rise buildings in construction materials and methods. When combined with overshadowing of neighbours' homes, causing them to use more artificial light, and affecting existing sustainable heating systems, the sustainability of the proposed development is likely to be poor.	There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1866	Acknowledged	Nice to see development in this area. Tower building seems a bit tall in the neighbouring context, but massing is good.	Noted.

Officer Response to Reg 18 Representations: Site 7 – 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11

Individual	R1867	Vision	<p>The vision is good. I have concerns about the volume and the effect it would bring to the existing infrastructure and the neighbourhood</p>	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the acknowledged for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.</p>
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Officer Response to Reg 18 Representations: Site 8 – 110 Stamford Street SE1

Respondent	ID	Draft SADPD Section	Comment	Officer response
Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make.</p>	Noted.
Natural England	R0163	General	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	Noted.
Transport for London Spatial Planning	R0312	Other	<p>Stamford Street forms part of the TLRN. Any changes to access and proposals for transport interventions on the TLRN will need to be assessed by, and subject to, TfL agreement. A safety scheme is currently being developed to reduce speeds on Stamford Street, although designs for this section are still in progress. There is an opportunity to improve the quality of the footway, which could be included in a section 278 agreement with TfL. As referenced in the site allocation, the impact of servicing and construction could be minimised through use of shared servicing arrangements and freight consolidation. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development.</p>	Noted. Policy wording amended to reflect suggested additions.
Mums for Lungs	R0501	Site Allocation Policy	<p>We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document.</p>	<p>One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes'. These strategic overarching principles are also applicable to the SADPD PSV.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings.</p> <p>As acknowledged by Lambeth cabinet last November, “Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough.” Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document.</p> <p>Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.</p>	<p>The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy SI1. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.</p> <p>The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth’s Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council’s work.</p>
Mums for Lungs	R0501	Transport	<p>Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough.</p> <p>We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?</p>	<p>Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.</p>
Mums for Lungs	R0501	Transport	<p>In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.</p> <p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It's equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p> <p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth</p>	<p>In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking.</p> <p>Other London Plan policies will be applicable, such as Policy T1 ‘Strategic approach to transport’, T2 ‘Healthy streets’ and T5 ‘Cycling’, that set the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			council so that they become a tangible, positive reality for everyone living and working in the borough.	
Coin Street Community Builders	R0619	Other	<p>CSCB's objectives for their two sites are as follows: Proposed Site 8: 110 Stamford Street SE1 – the extension of the Coin Street neighbourhood centre to add to the community facilities on the existing site, possibly with housing above or adjoining. The capacity study undertaken by Haworth Tompkins, architect of the adjoining 59-home Iroko housing development and the existing neighbourhood centre, indicated that a maximum of 20 flats would be provided and at a cost that would mean that all but 4 of these would have to be for market sale. It is therefore difficult to see why CSCB should prioritise this use. 110 Stamford Street is the site next door to the Coin Street neighbourhood centre. The existing centre has been designed to be extended with its main staircase and lifts positioned and sized to serve the extension. CSCB's current focus is (i) on the PA1 Doon Street housing, public swimming and indoor leisure centre development and (ii) on the re-landscaping of Bernie Spain Gardens north park. CSCB believes that the growing residential population of the area means that community facilities rather than private flats for sale will be its priority when CSCB's focus moves to 110 Stamford Street. The existing neighbourhood centre houses a family & children's centre (including a day nursery), and is the base for youth, family, healthy living and employment support programmes. It provides meeting and activity facilities and is where all CSCB staff are based. It is heavily used and run on the cross-subsidy model which underpins all CSCB public service delivery. There are significant unmet needs in terms of community facilities in the neighbourhood, notably in terms of youth and older persons' facilities, and the residential population of the area continues to grow. CSCB's prime objective for this site is to use it to meet these needs.</p> <p>The SADPD proposes community/office space on the ground floor with 30 – 40 flats above. This does not prioritise community facilities nor make proper use of the investment CSCB has already made in the construction of the existing centre. The capacity study by the architect responsible for the award winning adjacent developments - Iroko housing and the phase 1 neighbourhood centre - suggests a maximum of 20 flats could be satisfactorily accommodated on the 110 Stamford Street site. This study was provided to the Council and the Council's evidence for believing that the site could accommodate "30 to 40 self-contained residential units" has not been shared with us and is not apparent from the SADPD 'Evidence' document. The 'indicative approach' illustrated in Figure 11 shows a higher block than Haworth</p>	<p>The building line has been aligned with that of the Coin Street Community building to provide a contiguous built frontage. This is considered beneficial in place making terms both for the site's integration with its neighbour and in broader townscape terms - for example - long, continuous facades on the same alignment are common on Stamford Street; especially with the listed terraces opposite the site. A continuous, flat frontage is key to local character and distinctiveness. Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use. The number of flats has been revised to 30 after reconsideration of the site's capacity.</p> <p>The site allocation allows for community facilities to be provided and the exact details of provision will be determined through a planning application. This would include the ratio of community to residential floorspace, which is not prescribed in the SADPD. At the application stage it will be possible to determine whether the proposed development meets the requirements of Local Plan Policy S2.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>Tompkins felt appropriate, and this may have unfortunate impacts on Iroko Housing Cooperative.</p> <p>At the same time the block is 'pulled back' from the street leaving a smaller footprint for the accommodation and an extremely large area of pavement with no apparent purpose. CSCB considers that there should be no obligation to 'set back' in this way.</p> <p>The SADPD states 'The requirements of Local Plan Policy S2 in relation to new social infrastructure and assessment of anticipated impacts on existing social infrastructure should be addressed.' The provision of community facilities on the site, which is the priority for CSCB, will obviate any need for any further requirements. This should be acknowledged in the text. The principles would be the same in relation to open space.</p>	
Coin Street Community Builders	R0619	Other	<p>The SADP states 'Where possible the River Thames should be prioritised for the transportation of construction materials and waste during construction of the development...'. This was a possibility over two years ago, when CSCB asked the Council to pursue this with the IBM redevelopment (76-78 Upper Ground) and the adjacent LTVC redevelopment (72 Upper Ground), two very large riverside schemes. Neither of these developments plan to use the River Thames for transportation of materials and waste and the Council appears to have concluded that its project to improve the Upper Ground 'spine route' may have to be postponed until these two developments have been completed. It seems bizarre to suggest this approach to waste management for 110 Stamford Street which is not on the river but is on a main TfL trunk road.</p>	<p>The wording introduces an objective rather than a requirement and actual arrangements would be decided at the time of any application. Other related text in the DPD states "Potential for freight consolidation and sharing of servicing requirements with nearby sites should be explored" and these two objectives are mutually reinforcing.</p>
GLA	R0852	Other	<p>This site is located within CAZ and is long term vacant. As per LP2021 Policy SD5, offices and other CAZ strategic functions are to be given greater weight relative to new residential development in this area. The proposed site allocation appears to prioritise residential uses (30 to 40 units) with community/office floorspace only at ground floor level.</p>	<p>The site is also located within the Waterloo Opportunity Area which has a target for provision of both homes and jobs. London Plan para. 2.5.5 enables development plans to set out policies for the appropriate balance between CAZ strategic functions (including offices) and residential in mixed-use areas and in identifying locations or sites where residential development is appropriate. The proposed residential development would not lead to any loss of office floorspace (London Plan SD5 G) and is considered to be of a small enough scale that it would not compromise the strategic functions of the CAZ (SD5 A). It is also considered that the site could fall within the exception of "predominantly residential neighbourhoods" as stated in SD5 C (ii), as it would complete the development of a block that is predominately residential.</p>
Environment Agency	R0886	Other	<p>Current flood zone designation: 3 (in tidal breach modelling) Rivers on / adjacent to site / flood defences: No Permitted waste site within 250 metres: No Groundwater Source Protection Zone: No</p>	<p>Accepted. Text changed accordingly.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			Comments to add into site allocation text: Protect groundwater from contamination sources.	
Mulberry Housing Co-op	R1088	Other	<p>Land Uses</p> <p>The residential is supported and necessary but with a greater emphasis on social and properly affordable housing.</p> <p>There would be a preference for community use at ground floor.</p> <p>Affordable housing and workspace</p> <p>This site could deliver 100% necessary affordable housing.</p> <p>We don't see "affordable" office use a practical option.</p> <p>Transport, movement and public realm</p> <p>Housing with some community space is the most important use of this site.</p>	<p>Support for housing and community uses is noted.</p> <p>The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan.</p> <p>Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites.</p>
Mulberry Housing Co-op	R1088	Other	<p>Building heights, views and townscape</p> <p>It would be much better to keep in line with the neighbourhood Centre rather than move to King's building heights : this would be much more in keeping with this section of Stamford St. opposite residential housing. Importantly, the massing on this site must not cause harm to the residents of Iroko housing or any of their outdoor space.</p>	<p>The building line has been aligned with that of the Coin Street Community building to provide a contiguous built frontage. This is considered beneficial in place making terms both for the site's integration with its neighbour and in broader townscape terms - for example - long, continuous facades on the same alignment are common on Stamford Street; especially with the listed terraces opposite the site. A continuous, flat frontage is key to local character and distinctiveness.</p>
Mulberry Housing Co-op	R1088	Other	<p>Urban greening and trees</p> <p>Is there an opportunity for street trees on this section of Stamford Street? We appreciate this is a GLA issue, not Lambeth.</p>	<p>Noted. The site's basement projects under the footway which limits the opportunity for street trees.</p>
South Bank and Waterloo Neighbours	R1312	Other	<p>Building heights, views and townscape</p> <p>We question whether this site should mediate between prevailing heights. The opposite side of Stamford Street has a consistent parapet height. Perhaps this side should too.</p> <p>We also question whether a building on this site should necessarily continue the building line of 108 Stamford Street. Perhaps there's a better resolution of the street geometries.</p> <p>Most importantly, the massing on this site must not cause harm to the residents of Iroko housing or any of their outdoor spaces.</p>	<p>It is considered that it townscape terms a continuous building line / built frontage is more important than uniform heights. The heights along Stamford Street vary considerably but all the blocks generally share a continuous building line. The building line has been aligned with that of the Coin Street Community building to provide a contiguous built frontage. This is considered beneficial in place making terms both for the site's integration with its neighbour and in broader townscape terms - for example - long, continuous facades on the same alignment are common on Stamford Street; especially with the listed terraces opposite the site. A continuous, flat frontage is key to local character and distinctiveness. Testing has sought to ensure no unacceptable impacts on neighbour amenity.</p>
South Bank and Waterloo Neighbours	R1312	Other	<p>We question whether 'the opportunity to create a new high quality public space... with potential for a kiosk' is the best use of space at the front of this site. Housing is the primary need.</p>	<p>Noted. See comments above on the reasoning behind the building line. The resulting generous footway offers significant potential for public realm improvement. The draft policy is not insistent on kiosk provision; it is one option worthy of consideration.</p>
South Bank and Waterloo Neighbours	R1312	Other	<p>Urban greening and trees</p> <p>Is there an opportunity for street trees on Stamford Street?</p>	<p>Noted. The site's basement projects under the footway which limits the opportunity for street trees.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
South Bank and Waterloo Neighbours	R1312	Other	Transport, movement and public realm The retention of the car park ramp will need a lot more thought, to address safety and security issues.	Safety and security impacts from any proposal will be reviewed as part of the application process, and if required appropriately mitigated.
South Bank and Waterloo Neighbours	R1312	Other	Land Uses The residential use of the upper floors is supported, but with a greater emphasis on affordable housing. There would be a preference for community use at ground floor. Otherwise, the site has the potential to accommodate commercial as well as office use on the ground floor and basement.	Support for housing and community uses is noted. The site allocation allows for community facilities to be provided and the exact details of provision will be determined through a planning application. The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan. Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites.
South Bank and Waterloo Neighbours	R1312	Other	Affordable housing and workspace This site has the potential to deliver 100% affordable housing and this target should be encouraged. We wouldn't anticipate that any quantum of office space on this site would be likely to trigger affordable workspace provisions.	The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan. Affordable workspace policy would only be triggered if the amount of office floorspace to be provided exceeded the policy trigger point.
Waterloo Community Development Group	R1318	Other	Genuinely affordable housing is the number one priority for Waterloo, primarily because virtually none has been developed in the past 20 years, even as social housing has been lost to RTB, and numerous hotels and millions of sq. ft. of office have been approved, along with around 1,000 residential homes. The argument made by every developer is that the land value is simply too high to warrant affordable housing – better to invest some s106 further south. Naturally we don't accept such a simplistic approach, which flies in the face of the general proposition of creating mixed and balanced communities. Coin St Community Builders (not a charity but a 'not-for-profit' company limited by guarantee answerable only to the limited number of members on the board – some of whom are paid – with none of the tenants having any rights in the company whatsoever) own a number of sites for social co-op housing, which they have failed to develop in 40 years. These are some of the only sites available for a high proportion of affordable housing given their zero land values (there are covenants preventing	The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan. The planning history of the site has been investigated and there is no evidence of there ever being a permission for housing on Site B2. The number of flats in the draft site allocation has been revised to 30 after reconsideration of the site's capacity.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>CSCB using the sites for commercial purposes). The NPPF states that “planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.” (68)</p> <p>Given the potential outlined above and the very high returns which can be generated from ground floor and basement retail in area of London with some of the highest footfall close by (30m visitors walk along the South Bank each year, less than 200m away, while nearly 100m spill out Waterloo Station, only 300m away), it is essential that planning policy acknowledges their unique privilege in Waterloo as sites capable of providing a very significant proportion of affordable housing.</p> <p>Site 8 is a relatively straightforward site in single ownership for 40 years with very clear requirements for it set out in the original permission for the Coin St estate and its transfer from the GLC to CSCB for a greatly discounted sum (£750,000 in 1984 for all of the sites from the Oxo tower to Waterloo Bridge!). Despite this, it has not been developed throughout the 40 years of ownership by CSCB. The reason why it requires a SA is to encourage the landowner to develop the site or return it to public ownership.</p> <p>[There is a slight complication of the uses for various sites in the outline permission of 1983 and the terms of the transfer. The site was known as B2 and conjoined to the Coin St battle late in the process, with Boots' offices the last occupant of the building, which was demolished in 1985 (contrary to the implication of the note at Fig 7 in the evidence base). The proposal was for the site to be used for a community centre (later named the Hothouse), but there was then a swap with the site the Neighbourhood Centre now occupies, much of which was always designated for social housing. Site B (i.e. site 8) inherited the designation for social housing as a result of the swap.]</p> <p>The plan should aim to maximise the proportion of affordable housing, potentially all of it affordable, apart from ground floor and basement. There is no call for further social infrastructure given the vast space of the adjacent Neighbourhood Centre, which is massively under-used.</p>	
Waterloo Community Development Group	R1318	Other	<p>The vacant site is not only a long missed opportunity, it is an eyesore, as the various pictures in the evidence base demonstrate.</p> <p>We entirely support the constraints and opportunities identified at 2.22 in the evidence base, and the indicative approach toward massing and general height of 6 storeys/22m to optimise the site for social housing. Given the potential to use the servicing in the Neighbourhood Centre (which was all deliberately placed at the end toward Cornwall Rd for this purpose, and is too big to simply serve the existing Neighbourhood Centre) we are surprised that such massing would only arrive at 30-40</p>	<p>The alignment of the building façade with the building line of its Coin Street neighbour makes sense in townscape terms and would integrate well with the adjoining heritage and townscape. The quantum set out in the draft DPD are approximate, informed by high-level testing of the optimum level of development that could in principle be accommodated on the sites. It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development plan. These development proposals will be assessed in detail through the planning application</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>residential units. We did a similar exercise at the time of the Mama Mia planning application 4 years ago and concluded the site could provide around 50 units with the dwelling mix set out in the FALP 2016. CSCB has provided a greater proportion of family housing of 3-4 bedrooms on their other sites, and we would support such an approach here, so maybe that would account for the lower number of units?</p> <p>We don't support the strict adherence to the building line of the adjacent Neighbourhood Centre, leaving a very wide pavement, nor the potential for a kiosk on the corner of the pavement/ site. The full size of the site should be used appropriately to provide an interesting building at ground – the additional space not used for pavement could provide a lobby for the residents, for example.</p> <p>The site is not appropriate for a tall building. The building should relate meaningfully and sympathetically to the very important private open amenity space of Iroko (potentially even sharing it as amenity?) – it should not overshadow or overlook this space, except where it relates to it. Development should also relate to the fine terrace across Stamford St.</p>	<p>process.</p> <p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Waterloo Community Development Group	R1318	Visions	Servicing should not be from the loading bay on Stamford Street, but via the existing ramp into the basement of Iroko and Site 8.	The Site Allocation would not support servicing on Cornwall Road, to protect users of Cycleway C10. The exact location of proposed servicing would be assessed during the application process. Policy wording will be amended to remove reference to loading bay on Stamford St.
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it</p>	Noted.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as</p>

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			<p>impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.</p>	<p>find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> • Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO₂e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO₂e output. - 4-5% of the worldwide total of CO₂e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions 	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			<ul style="list-style-type: none"> - Cement constructions contribute to the “urban heat island effect”, by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution • Steel Steel also has a significant impact on the environment: <ul style="list-style-type: none"> - It is CO2e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement: <ul style="list-style-type: none"> • Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit “off-gas” toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. • Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world’s riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber. 	

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Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> • Overheating, caused by the proliferate use of glass and a high concentration of inhabitants • Increasing carbon energy required to offset this through mechanical ventilation • Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise ‘skyscraper’ buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p> <p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p>
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council’s commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass</p>	<p>Noted. Please refer to officer responses to previous points made as part of this representation.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <ol style="list-style-type: none"> 1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills. 2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy. 3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board. 4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable. 5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon. 	

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	
Individual	R1404	Vision	This site should be used for social/cooperative housing as decreed in the 1984(?) covenant when the GLC sold it to CSCB at a knockdown price.	<p>The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan.</p> <p>The planning history of the site has been investigated and there is no evidence of there ever being a permission for housing on this site.</p>
Individual	R1642	Vision	New social housing must be a priority, particularly in the current climate. The need for social housing will only ever grow and it is the responsibility of everyone involved in this project to ensure this project does exactly that.	The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan.
Individual	R1664	Vision	The site needs to be used for social housing and to provide small to medium workspaces and studio spaces for residents to develop businesses. Local residents must be engaged to ensure the businesses reflect local need rather than corporate want.	<p>The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan.</p> <p>The quantum set out in the draft DPD are approximate, informed by high-level testing of the optimum level of development that could in principle be accommodated on the sites. It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development</p>

Officer Response to Reg 18 Representations: Site 8 – 110 Stamford Street SE1

Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>plan. These development proposals will be assessed in detail through the planning application process. Local residents will have an opportunity for engagement with any planning application.</p> <p>If sufficient employment floorspace was proposed, then Local Plan Policies ED1 F (flexible workspace suitable for micro, small and medium-sized enterprises) and ED2 (affordable workspace) would be engaged.</p>

Officer Response to Reg 18 Representations: Site 9 – Gabriel’s Wharf and Princess Wharf, Upper Ground SE1

Officer Response to Reg 18 Representations: Site 9 – Gabriel's Wharf and Princess Wharf, Upper Ground SE1

Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R0036	Evidence	<p>I disagree strongly with the proposal that the site of Gabriel's Wharf be developed into a mass comparable to the indicative approach. I believe there are myriad disputable statements in the evidence document -- using the Shell Centre development as an example to excuse more high-rise residential development in the conservation area is insane to anyone who has physically been to that site since the new towers have gone up, for example. Firstly, they're not on the river as Site 9 is. There's a large park between them and the river walk. Secondly, those towers are an unlivable hell to any members of the public unfortunate enough to have to live or move anywhere near them. A windswept emptiness full of idle private security and absolutely no public appeal or provision, in a heavily pedestrian-trafficked area. How could they have messed up such a site without trying? Do not follow this example when setting policy for Site 9's development.</p> <p>I'll try to stay more general, though. Who is the South Bank for? Who is the Queen's Walk for? I am a resident of the local area and walk these areas every single day, for leisure as much as for getting places. I can tell you what I see there: a beautiful, world class river walk filled with incredible landmarks of culture, pleasant green and river surroundings, repurposed heritage buildings and less monumental, cute, quirky areas for visitors to discover and explore, like the skating undercroft and Gabriel's Wharf. A site that millions of people come to from around the world BECAUSE of the variety of attractions and amenities.</p> <p>What I don't see, when I walk the Queen's Walk from Lambeth Bridge to Borough Market regularly, is another opportunity for tower office blocks and high-rise luxury residences for the rich. There is plenty of that allocated nearby and elsewhere in London. If this stretch of river becomes Canary Wharf 2 with no lessons learned from the original Canary Wharf it will be an incalculable loss. If you're rich and want a river view, there's the Shell Centre development, Parliament View Apartments, or countless others. You can compete with other rich people for those amazing views already. Or if a company is looking for offices post-covid, is the CEO's office river view winning the prestige competition among his CEO peers the priority in developing this site? What I'm trying to say is that the riverside, when it was first developed, was a competition between the cultural and aesthetic icons that have attracted the public and made the Southbank area a world-class attraction in London, and commercial developers looking to build loads of ego-stroking offices like they had done in the Isle of Dogs. There's a tension there still, of course, with IBM there, and the ludicrous proposed</p>	<p>The approach to the site has been revisited and amended. The SADPD encourages a mix of uses including cultural uses, offices, housing with affordable housing, and shops and restaurants. This mix will contribute positively to the Waterloo Opportunity Area and this part of the South Bank and Bankside Strategic Cultural Area, complementing existing facilities. Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten-year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use, alongside other appropriate uses.</p>

Officer Response to Reg 18 Representations: Site 9 – Gabriel's Wharf and Princess Wharf, Upper Ground SE1

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>replacement for the Television Centre. But the war has been won. The Southbank is for the public to enjoy film, theatre, street food, open spaces, temporary attractions and more.</p> <p>What that means is, it shows a staggering lack of imagination to want to put some tall mixed-use blocks, with xx-million-pound penthouses on top to ensure a return, into a site like this. You are building alongside the National Theatre, the BFI National Film Theatre, Royal Festival Hall, The Hayward Gallery, The Tate Modern, Shakespeare's Globe! Use your brains and accept nothing less than an icon on their level! Build for the millions of people who walk this area, and not the 500 who'd look out the window of their offices once a week and wonder what their company is paying in rent. I have worked in Television Centre, I know. Do not squander this site when its potential to be an amazing landmark is so obvious.</p> <p>Here's a free idea, you can have this one. Take Gabriel's Wharf and its cute independent retail and restaurant units as inspiration and build an amazing labyrinthine multi-level version of it. Small units, small rents, ex-industrial wharf architectural heritage incorporated in the design, a unique attraction. On the Prince's Wharf site next to it, a museum of, say, South London, history and culture. Any architect would salivate to create something that would beautify rather than just overshadow the Bernie Spain Gardens and the Queen's Walk. Those ideas are free, you can have them.</p> <p>I admit I don't know how far your Site Allocation policy can nudge this development toward such lofty goals, but are they even lofty, when they sit next to the aforementioned list of amazing cultural and architectural sites that already surround them? How did those all happen, if this is too hard? I think the location of this site demands a careful reappraisal of its potential for more than some chain restaurants and cubicle farms. I encourage everyone with an influence on this to think bigger - not physically but at least at the bigger picture.</p>	
Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p>	Noted.

Officer Response to Reg 18 Representations: Site 9 – Gabriel's Wharf and Princess Wharf, Upper Ground SE1

Respondent	ID	Draft SADPD Section	Comment	Officer response
			M&W officers have reviewed the consultation information and have no further comments to make.	
Natural England	R0163	General	Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.	Noted.
Transport for London Spatial Planning	R0312	Other	As stated, the site is close to the South Bank Spine Route project and, as such, a contribution towards the project should form part of the transport mitigation. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development.	Noted. Transport text has been reassessed and amended where required.
Mums for Lungs	R0501	Site Allocation Policy	We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document. We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings. As acknowledged by Lambeth cabinet last November, "Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough." Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document. Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.	One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes'. These strategic overarching principles are also applicable to the SADPD PSV. The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy S11. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation. The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth's Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council's work.
Mums for Lungs	R0501	Transport	Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough. We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding	Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.

Officer Response to Reg 18 Representations: Site 9 – Gabriel's Wharf and Princess Wharf, Upper Ground SE1

Respondent	ID	Draft SADPD Section	Comment	Officer response
			congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?	
Mums for Lungs	R0501	Transport	<p>In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.</p> <p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It's equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p> <p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth council so that they become a tangible, positive reality for everyone living and working in the borough.</p>	<p>In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking.</p> <p>Other London Plan policies will be applicable, such as Policy T1 'Strategic approach to transport', T2 'Healthy streets' and T5 'Cycling', that set the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.</p>
Coin Street Community Builders	R0619	Other	<p>CSCB's objectives for their two sites are as follows:</p> <p>Proposed Site 9: Gabriel's Wharf & Prince's Wharf, Upper Ground SE1 – a nursing home and public piazza on Gabriel's Wharf with an enabling development on Prince's Wharf. The latter would be needed to fund the nursing home and is currently envisaged as managed workspace. The outline designs for these two sites developed by Stanton Williams Architects include active retail/café type uses on the ground floors of both developments, basement servicing, and high quality public realm. Any housing included would need to contribute to the funding of the public realm and nursing home.</p> <p>Site 9 in the adopted Lambeth Local Plan also includes the redevelopment of the former London Television Centre site and Queens Walk Gardens. The SADPD has removed these two sites from Site 9 but we assume that consideration of the current proposals for 72 Upper Ground will include the criteria set in the SADPD for Gabriel's Wharf and Prince's Wharf, namely: "The scheme should be designed to cause no unacceptable impacts on existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise</p>	<p>The 9m tree protection area takes account of access requirements for construction and also future tree growth, not just the current extent of the roots. Development needs to be located away from the trees to take account of this. The council considers the indicative approach in the SADPD to reflect this. Active frontages and cultural uses are required on the ground floor with the potential for other uses on upper floors.</p> <p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>pollution. Particular regard should be paid to the relationship with sensitive residential neighbours on Upper Ground. Development should ensure that the amenity value of Bernie Spain Gardens is not diminished by undue overshadowing...". CSCB has planning consent for new planting and seating between the former London Television Centre and the riverside walkway. .</p> <p>The SADPD does not reflect these CSCB objectives or design and need studies. Instead, the SADPD's approach to the sites assumes that CSCB will act as a commercial developer, seeking to maximise private housing. CSCB therefore considers that Lambeth Council is not entering into effective engagement with CSCB to achieve development on Sites 8 & 9 to meet the needs of the local community, in line with the NPPF and recent direction from the Secretary of State.</p> <p>Proposed Site 9: Gabriel's Wharf & Princes Wharf, Upper Ground SE1</p> <p>This site lies between the former ITV headquarters and Bernie Spain Gardens. ITV owns a lease on Princes Wharf which expires in 2029, at which point CSCB will be able to develop the site. In anticipation of this, CSCB commissioned Stanton Williams Architects to prepare proposals for a nursing home, community facilities and a piazza on Gabriel's Wharf with an enabling workspace development on Princes Wharf. The 76-bed nursing home is aimed at allowing local people who are no longer able to live in their own homes (because of dementia or other illnesses) to live close to their friends and in a neighbourhood with which they are familiar. The Gabriel's Wharf scheme includes both communal facilities for residents of the nursing home and community facilities serving the wider residential population aimed at encouraging inter-generational support and programmes.</p> <p>CSCB's proposal for a nursing home on the Gabriel's Wharf site is a response to a demonstrated demand to cater for those in need of nursing care locally, itself partly generated by the increase in the neighbourhood residential population initiated by CSCB in the 1980s and 1990s, and now amplified by many private residential developments. The social enterprise principle of cross-subsidy is intended to permit much of the nursing home and 'step down' provision to be offered at local authority and NHS rates where most current nursing home development is for provision at market rates. Under the planning system, nursing home accommodation (unlike extra care housing) is not considered as 'housing'. Nevertheless, what CSCB is proposing is in effect affordable accommodation to meet the needs of a particular segment of the local population - and therefore much more in line with neighbourhood needs than simply building homes for market sale with a small affordable component.</p>	<p>'Amenity' and H5 'Housing standards').</p> <p>Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach.</p> <p>The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan.</p> <p>The Integrated Commissioning Team at Lambeth has maintained a consistent position that there is no requirement for nursing home spaces in the area, as was established at the examination of the Local Plan. Such provision is not supported. There may be a need for some extra care housing and provision of this form if done in partnership with commissioners could be supported. Southwark have confirmed that they do not need a nursing home in the north of their borough and that there is not a requirement for Lambeth sites to provide any of Southwark's need. Site Allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites. This includes Local Plan Policy ED2 that addresses affordable workspace.</p> <p>The site allocation allows for community facilities to be provided and the exact details of provision and quantum will be determined through a planning application. At that stage it will be possible to determine whether the proposed development meets the requirements of Local Plan Policy S2. The pedestrian route to the west of the site is intended to be provided as part of the development of 72 Upper Ground and the policy wording has been amended to clarify this.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>The recent Inspector's Report into the Lambeth Local Plan's stated the following (bold emphasis added):</p> <p>'110. The issue of the potential need for additional nursing homes in Lambeth was the subject of considerable discussion during the hearing sessions and a SCG was signed and submitted by the principal parties. The Council's strategy towards nursing homes, supported by evidence from the NHS, is to continue to support people to remain independent for as long as possible in their own home, but when this is no longer possible, a fully residential nursing home or care home is needed. Also, the Council's submission is that there is no demand within the Borough for additional nursing home beds over the plan period.</p> <p>111. I also note that Guy's and St Thomas' NHS Foundation Trust has welcomed Coin Street Community Builders' proposal for a new nursing home, which has been backed by a report commissioned by the group. I am not, however, persuaded from the evidence submitted to the Examination that there is a compelling case for a new nursing home to meet Lambeth's needs, especially in relation to the Council's strategy as summarised above. I therefore consider that this issue can appropriately be addressed at the forthcoming Draft Site Allocations Plan for Lambeth, which I understand is to be consulted on shortly, and that it is the intention of the Council to include the Coin Street site in that document.'</p> <p>CSCB submitted a report by Kingsbury Hill Fox on the needs assessment and planning of nursing and care homes. This demonstrated that predicted local demand from the three wards (one in Lambeth and two in Southwark) which make up CSCB's area of benefit would on its own be sufficient to take up all of the planned 76 bed spaces. Though CSCB understands the rationale for Lambeth's focus on housing provision suitable for older people to remain independent in their own homes for as long as possible, no evidence was provided to counter the research submitted by CSCB that there would nevertheless be demand for a nursing home, including from Lambeth residents in this area. In addition, as referenced by the Inspector, there is continuing demand from Guy's and St Thomas' NHS Foundation Trust, which primarily serves SE London patients, for 'step-down' and flexible facilities.</p> <p>There has also been consistent support from Southwark, throughout CSCB's ten years of work on the need for and provision of older persons accommodation, for nursing home provision serving local needs. CSCB remains disappointed that Lambeth was not willing to engage with the evidence that there would be a local demand for these nursing places, and that the Lambeth approach took no account of</p>	

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>cross-borough considerations.</p> <p>The draft SADPD allocates Site 9 for 'cultural uses, offices, housing with affordable housing, and shops and restaurants fronting a new piazza'. This does not take account of CSCB's objectives or its assessment (supported by the Kingsbury Hill Fox study) of the needs of the neighbourhood. The Council acknowledges that Lambeth does not need the site to be redeveloped for housing and it is not CSCB's intention to redevelop it for housing or offices, other than as a means of funding a nursing home also on site. This needs to be clearly set out in the SADPD.</p> <p>The SADPD states that, if office space is proposed on Site 9, Local Plan Policy ED2 on affordable workspace will apply. CSCB considers that there is not a priority need for affordable workspace in the Waterloo area at the pricing levels set out in Policy ED2 and that, instead, contributions to the nursing home and community facilities - including local parks - need to be prioritised.</p> <p>The SADPD also states 'The requirements of Local Plan Policy S2 in relation to new social infrastructure and assessment of anticipated impacts on existing social infrastructure should be addressed.' The provision of community facilities on the site, which is the priority for CSCB, will obviate any need for any further requirements. This should be acknowledged in the text. The principles would be the same in relation to open space.</p> <p>The SADPD makes specific mention of increasing public realm to the east by 'pulling back' the footprint of the Gabriel's Wharf development. The SADPD appears to remove the Stanton Williams piazza between the new buildings on Prince's Wharf and Gabriel's Wharf and, instead, to extend Bernie Spain Gardens north. This destroys the essence of the Stanton Williams proposals, ignores the requirement for a piazza in Lambeth's Local Plan, and makes a nonsense of over 5 years consulting on, designing, gaining consent for, and starting to implement the Bernie Spain Gardens north scheme. This is a very thoughtless intervention.</p> <p>[image of proposed piazza and extract from Local Plan]</p> <p>The SADPD approach creates a single block on the proposed Site 9 which in effect reduces permeability between Upper Ground and the riverside walkway, long a cornerstone of Lambeth's policy for this area. The SADPD refers to the existing mock Tudor building at Princes Wharf as a positive contributor to the Conservation Area. However, its retention will compromise the ability to deliver the best laid out development on Site 9 and this needs to be acknowledged in the SADPD. It should not be an obligation to retain the building.</p>	

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>The SADPD also states 'the building line to the eastern edge of the site should not harm the root protection zones or canopies of trees in Bernie Spain Gardens. Allowance should be made for the construction phase and also future growth of the trees'. The Evidence document that accompanies the SADPD also states 'Tree protection areas of the trees on Bernie Spain Gardens extend into the Gabriel's Wharf site by approximately 9m'. The extent of the roots is not 9m. The Arboricultural Impact Statement agreed by the Council when it approved the plans for re-landscaping Bernie Spain Gardens north in 2019 identified a maximum of 2-3m encroachment of root protection areas onto the Gabriel's Wharf site, within the area which would in any case not be built on. The reference to 9m has no evidence base and so needs to be deleted.</p> <p>72 Upper Ground</p> <p>As can be seen from the plan extracted from the Lambeth Local Plan (above), the former London Television Centre (LTVC) site is currently part of Site 9 but has not been included in the SADPD.</p> <p>CSCB is very concerned that the SADPD does not contain a site-specific policy allocation for 72 Upper Ground. The adopted Local Plan policy for this site includes key principles about creating new north south routes as part of the redevelopment. This principle needs to be enshrined in the SADPD until any redevelopment of the LTVC site is complete with these routes in place. Of additional concern is the wording in the SADPD for Site 8 that states 'New vibrant and attractive pedestrian routes should be created to the eastern and western boundaries of the site, giving access between Queen's Walk and Upper Ground.' Previous principles have been that the western route is to be provided using land within the 72 Upper Ground site. It is not acceptable or reasonable that this policy obligation should now fall entirely on to Prince's Wharf and Gabriel's Wharf.</p> <p>The SADPD states in relation to Site 9, 'Sensitive redevelopment designed to complement proposals for the neighbouring former ITV site at 72 Upper Ground can also improve the public realm at Queen's Walk, providing better activation to the river frontage; help increase the permeability of the area; and contribute positively to the townscape along this part of the South Bank.' These principles (and indeed most of those listed on pages 52 – 55 of the SADPD) should be applied at 72 Upper Ground and the site be included in the SADPD.</p> <p>It is also noted that the SADPD states that redevelopment of Site 9 'should be designed to cause no unacceptable impacts on existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise pollution. Particular regard should be paid to</p>	

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>the relationship with sensitive residential neighbours on Upper Ground. Development should ensure that the amenity value of Bernie Spain Gardens is not diminished by undue overshadowing or enclosure.' The sensitivity of Bernie Spain Gardens to overshadowing from future development is also noted in the SADPD Evidence document. CSCB agrees that these principles are reasonable, but only if the same principles are applied to the redevelopment of 72 Upper Ground. There is a current planning application with the LB Lambeth for the redevelopment of the 72 Upper Ground site. If this goes ahead in anything like its presently proposed form, it will be wholly inconsistent with the principles being applied to Site 9 in the SADPD. Further, it would cause daylight issues for any new residential development on Princes Wharf as well as harming the existing homes to the south.</p> <p>Conclusions</p> <p>In conclusion, and as referred to above, CSCB considers that the plan is not sound in the case of Sites 8 & 9. This is because it is not:</p> <ul style="list-style-type: none"> • Positively prepared, as it does not meet the community needs to which CSCB is seeking to respond, nor acknowledge that CSCB will only redevelop the sites for purposes that it believes will meet the priority needs of its neighbourhood; • Justified, as it does not take account of architectural and other work and evidence commissioned by CSCB which consider the potential of the sites in line with CSCB's aspirations for meeting neighbourhood needs; • Effective, as the proposals in the plan will not be delivered over the plan period due to them not being focussed on priority needs of the neighbourhood; nor • Consistent with national policy, as it does not take account of the aspirations of the local community as directed by the NPPF. <p>The allocation of Sites 8 & 9 needs to be amended in the manner referred to in this document. CSCB is keen to work with the Council to achieve this and seek effective engagement through further meaningful dialogue and workshops with the Council prior to the issue of its Regulation 19 plan.</p>	
Historic England	R0654	Other	<p>We advise that further TVIA images are carried out to support a building of 44m on this site. The site is identified as not being suitable for a tall building and a height of 44m would not meaningfully mitigate the effect of a tall building. The area is low to mid-rise and a building substantially taller would have implications and does not reflect the surrounding character of the area</p>	<p>There are a number of noticeably taller buildings in the immediate locality (ITV tower c 80m etc.) The nearby Sea Containers building is c50m in height. Site allocations documents are an established means of identifying locations suitable for tall buildings. A scheme of 44m would not be out of keeping in this varied context. The Lambeth Local Plan policy definition for tall buildings in this locality is 45m. Anything up to that height is technically not a tall building and would be 'mid-rise'. The Indicative approach of the</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				evidence base has been further refined and the TVIA work revisited as a result.
Environment Agency	R0886	Other	<p>The London Borough of Lambeth is located within 'action zone 2'. River walls will need to be raised to increase resilience to rising sea levels. We have identified the following site as being adjacent to the River Thames, and thereby in proximity to flood defences in the form of the river wall:</p> <ul style="list-style-type: none"> Proposed site 9. Gabriel's Wharf and Princess Wharf, Upper Ground SE1 - Flood risk mitigation Site Allocation Policy (page 55): They should also refer to Policy SI 12 - Flood risk management (f) of the London Plan is referred to in this section. Policy SI 12 states that "Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way." <p>The Lambeth Local Plan 2020-2035 makes reference to the TE2100 plan in Section 2.91. It is important that allocated sites, such as 2 and 9, are mindful of the need to have defences raised within the period of 2035-2049.</p> <p>Current flood zone designation: 3 (in tidal breach modelling)</p> <p>Rivers on / adjacent to site / flood defences: Yes – flood defences adjacent to site</p> <p>Permitted waste site within 250 metres: No</p> <p>Groundwater Source Protection Zone: No</p> <p>Comments to add into site allocation text: Protect groundwater from contamination sources. Protect riverside buffer zones and flood defences from further encroachment / development. Raising river wall in-line with TE2100 strategy</p>	<p>Accepted. Text has been added to site allocation policy to make clear that both London Plan Policy SI 12 and Local Plan Policy EN5 apply to development proposals. Text has also been added to protect groundwater from contamination sources, protect riverside buffer zones and flood defences from further encroachment / development; and raising river wall in line with TE2100 strategy.</p> <p>The allocation does acknowledge that the site is adjacent to a flood defence and that current and future statutory crest levels will need to be maintained as outlined in the Thames Estuary 2100 plan.</p>
Mulberry Housing Co-op	R1088	Other	<p>"Sensitive redevelopment designed to complement proposals for the neighbouring former ITV site at 72 Upper Ground can also improve the public realm at Queen's Walk, providing better activation to the river frontage; help increase the permeability of the area; and contribute positively to the townscape along this part of the South Bank."</p> <p>The development at 72 is not sensitive to the public or residential realm. This has been evidenced in respect of the impact on daylight and sunlight and submitted to Lambeth Planning.</p> <p>Site Allocation Policy SA/9 Gabriel's Wharf Heritage Assets Lambeth seem to be pushing ahead in seeking approval on 72 Upper</p>	<p>The scheme at no. 72 Upper Ground (former ITV site) was subject to a call-in inquiry by the Secretary of State in December 22 / January 23. That site is not subject to this site allocation work.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>Ground which is totally at odds with any care for heritage assets and local history.</p> <p>There is no way that proposals sit well with any of the low rise property on Mulberry. As it stands we have major issues with the proposed 72 Upper Ground development and daylight issues because of the bulk of the proposed building and its impact on the neighbourhood besides its impact on local heritage assets and across London. The view of and from this part of the river is iconic and will be destroyed by these proposals in respect of the two sites.</p> <p>Neighbour relationship</p> <p>What a farce is all we can comment given the total lack of care and consideration in planning terms with particular respect of 72 Upper Ground and its impact on neighbouring residential property and Bernie Spain Gardens. We can no take for our well being and mental health buildings of a massive size that totally overwhelm our houses on Upper Ground - the old "narrow wall" : our history and our heritage.</p> <p>Urban Greening and Trees</p> <p>We do not want to lose more trees to terrorist mitigation and would like consideration to be given to routes and pathways following decisions about 72 Upper Ground.</p>	
Mulberry Housing Co-op	R1088	Other	<p>Land Uses</p> <p>We support the mixed use of this site and would recommend the historical allocation of this site for affordable and sheltered housing should be undertaken by developers. Office development is not supported. The current usages of Gabriel's wharf should be maintained and developed and small and independent business encouraged. Building on this significant site in the South Bank Conservation area should be of the high end design quality Certainly possible but the assumption of size of the development creates problems. Assuming the removal of the route through the Wharf removes a vibrancy and suggests a park thoroughfare rather than destination; even for accepting access routes to the river walkway are critical.</p> <p>There needs to be a wider local consultation on the future of Gabriel's Wharf before any developer considers the site, including any consideration of the Queens Walk. Affordable workspace, workshops, housing is desirable (albeit the greatest need is for properly affordable and social housing.) Employment and skills development needs to be a Waterloo neighbourhood issue, integrated and identified. Digital connectivity indeed needs improvement for business to flourish locally.</p> <p>Terrorist Mitigation Issue</p> <p>Our experience of anti-terrorist mitigation this last year can only be described as negative. As a co-op it is unlikely we understand the</p>	<p>Noted. The tree loss for the hostile vehicle mitigation on Upper Ground was indeed regrettable, however the South Bank is identified as a place vulnerable to terror attacks and mitigation is often essential. The site allocation seeks to pull back the building line along the eastern side of the site at Gabriel's Wharf to ensure that the existing mature trees remain unharmed. Support for mixed use development noted.</p> <p>Active frontages and cultural uses are required on the ground floor with the potential for other uses on upper floors.</p> <p>The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan.</p> <p>It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development plan. These development proposals will be assessed in detail through the planning application process.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			background to such mitigation. Flood risk mitigation " A site-specific Flood Risk Assessment will be required as part of a planning application and flood risk should be verified by site-specific breach inundation flood levels, to determine more accurate flood depths at precise locations." This I find very interesting given comments I have made about Flood Risk Report in respect of 72 Upper Ground which seemed to be an "off the shelf" approach. Certainly considerable consideration will be needed in respect of flood risk mitigation and surface water issues.	
South Bank and Waterloo Neighbours	R1312	Other	Land Uses We support the mixed use of this site. But the historical allocation of this site for affordable and sheltered housing should be maintained on the upper floors. Further Office use in this location is not supported. Affordable housing and workspace This site has the potential to deliver 100% affordable housing and this target should be encouraged.	Support for mixed use development noted. The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan. It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development plan. These development proposals will be assessed in detail through the planning application process.
South Bank and Waterloo Neighbours	R1312	Other	Heritage Assets The development on this site should preserve and enhance the character of the South Bank Conservation Area. A building on this site should be of the very highest design quality. Building heights, views and townscape The local community are vehemently opposed to the overdevelopment of sites along the South Bank, and the indicative approach massing is completely inappropriate for this site. Taller elements up to 44m should not be permitted on the south side of the site, adjacent to the (approx.) 15m tall Mulberry housing. It is wrong to suggest that buildings on this site should mediate with 'its larger scale neighbours' to the west. The existing ITV building has relatively low buildings adjacent to this site and +H8+H9 There should be a direct connection to the current use of Gabriel's wharf in character and activity.	The indicative approach in the evidence document has been revisited and re-appraised for daylight and sunlight impacts / overshadowing. The site's location within the conservation area, and any design response, will be a material consideration at planning application stage given the Council's statutory obligation to pay special regard to the desirability of preserving the character or appearance of conservation areas. The land uses identified seek to perpetuate the vibrant character of Gabriel's Wharf along the perimeter of the site.
Waterloo Community Development Group	R1318	Other	The comments in the first 3 paragraphs for site 8 above [relating to affordable housing] largely apply to site 9. It was acquired for a heavily discounted price to provide social housing, community uses, and local employment. CSCB have not been able to develop Princes Wharf	Active frontages and cultural uses are required on the ground floor with the potential for other uses on upper floors. The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			because of the long lease by ITV which comes to an end in 2029. In the meantime, CSCB have used Gabriel's Wharf imaginatively for independent commercial uses which contributed to the subtle mix of uses which help create the enormous international success of the South Bank. Development of these sites needs to build on that imaginative use, whilst optimising the quantum of affordable housing on the site above the ground floor. There have long been proposals for the site to be used for sheltered housing of some sort, a proposal we would strongly support: the site and its views and liveliness would be extremely uplifting to many people whose movement is restricted.	apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan. The Integrated Commissioning Team at Lambeth has maintained a consistent position that there is no requirement for nursing home spaces in the area, as was established at the examination of the Local Plan. Such provision is not supported. There may be a need for some extra care housing and provision of this form if done in partnership with commissioners could be supported. Southwark have confirmed that they do not need a nursing home in the north of their borough and that there is not a requirement for Lambeth sites to provide any of Southwark's need.
Waterloo Community Development Group	R1318	Other	We're not convinced by the proposal to continue Duchy St as a line to the river walk, although it is an interesting concept. We believe that the relationship to Bernie Spain Gardens and the river are critical and potentially enormously beneficial commercially. We totally disagree with the quantum of development proposed, as illustrated in the indicative approach (of a maximum height of 44m), and illustrated in Figure 14. Together with the proposals for the ITV site this would create a wall of development which would be oppressive as well as harmful in terms of the daylight and sunlight impacts to the residents of the social housing along Upper Ground – see TVIA view 6, which we consider unacceptable. The view from Waterloo Bridge (TVIA view 4) would be impacted negatively with such a mass of building; again, the cumulative impact with the current proposals for the ITV site would be terrible. We are not saying nothing can be high: but the Oxo tower across Bernie Spain Gardens should be used as the baseline in terms of scale and height.	Gabriel's Wharf currently has a very negative relationship with Bernie Spain Gardens. The presence of tree constraints, and alignment of Duchy Street and the desire to improve the current poor relationship with Bernie Spain Gardens have informed the policy work. The ITV scheme was subject to a call-in Public Inquiry in December 22 / January 23 and is not part of the site allocation. The indicative approach for the site allocation has been revisited and the massing re-tested in a new TVIA.
Lambeth Green Councillors	R1321	General	1. Introduction The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis. Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only	Noted.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p>

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			<p>spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.</p>	<p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> • Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO₂e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO₂e output. 	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			<ul style="list-style-type: none"> - 4-5% of the worldwide total of CO2e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution • Steel also has a significant impact on the environment: <ul style="list-style-type: none"> - It is CO2e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement: • Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit "off-gas" toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. • Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world's riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not 	

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			recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber.	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> • Overheating, caused by the proliferate use of glass and a high concentration of inhabitants • Increasing carbon energy required to offset this through mechanical ventilation • Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The "urban heat island effect" • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise 'skyscraper' buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development.</p> <p>The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p> <p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p>

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Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council's commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <p>1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p> <p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p> <p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking</p>	Noted. Please refer to officer responses to previous points made as part of this representation.

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			<p>greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	
Individual	R1350	Vision	Too dense, too high, a disaster for the South Bank	Noted. The indicative approach for the site has been revisited and the massing re-tested in a new TVIA.
Individual	R1642	Vision	Gabriels Wharf has an important role as a social hub for the local community and has had for many years. While the provision of social housing is a vitally important need, it should be balanced against the need for outdoor social space for local residents, workers, and visitors.	The site allocation envisages an extension to Bernie Spain Gardens which would be available for residents, workers and visitors. Local Plan Policy EN1 addresses the provision of open space, green infrastructure and biodiversity.
Individual	R1665	Vision	I really like the proposed mixed-use usage for the be site, but I think a spot this prominent deserves to be exciting. I think building tall buildings could connect the former ITV building with the emerging cluster around Blackfriars Road, and could contribute greatly to the overall look of Southbank	Support for mixed use development noted.

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Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make.</p>	Noted.
Lambeth Accord	R0149	Other	<p>Background to Lambeth Accord 'We are 336' (336-8 Brixton Road) Lambeth Accord known as 'We are 336' comprises a 5-storey building fronting Brixton Road, a two-storey element extending to the rear of the site and a basement/lower ground level. There is a small car park at the front of the site and a loading area to the rear. 'We are 336' was built as a warehouse in 1967 but never used for this purpose. In 1971 it became for a computer centre for a bank until being taken over by Lambeth Accord in 1984.</p> <p>Lambeth Accord's focus is assisting charities working with people with disabilities. The building contains offices on its upper floors let to charities on annual leases/licenses, all concerned with different types of disability and all of whom pay below market rents. On the two lower floors are conference rooms and other community spaces which are let out for a commercial rent for a variety of purposes and whose income helps to subsidise the office space.</p> <p>The building is in poor condition, awkward in its layout and no longer fit for purpose. We therefore wish to redevelop, or part refurbish it, in order to increase the space available and provide more up to date accommodation. We intend to use the same financial letting model as at present. For this we recognise that we will need some form of partner arrangement.</p>	Noted. The council will continue to engage with landowners and occupiers.
Lambeth Accord	R0149	Other	<p>Comments on overall scheme</p> <p>Lambeth Accord have no objection to the concept of a comprehensive development with adjacent owners, if this is of benefit in assisting Lambeth Accord to achieve its own goals. However, given that we may well wish to redevelop our site in the next few years and development timescales for other owners may differ, it is essential that we retain the</p>	Noted. The wording of the policy text enables the site may come forward in phases, while ensuring this would not prejudice the optimum future development of any adjoining plots. Additions have been made to the policy text for neighbour relations, to ensure that where a site comes forward in phases, applicants must test the relationship with potential optimum massing and uses on adjacent parcels of land to demonstrate that acceptable neighbour relationships can be achieved.

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			option to proceed independently. Any proposed overall layout should allow us to do this.	
Lambeth Accord	R0149	Other	Views may differ as to the attractiveness or otherwise of the 'We are 336' building, but we would agree that its brutalist appearance with large geometric concrete slabs is somewhat incongruous in its present setting between older and lower brick-built buildings. This being the case, we are not opposed to the demolition of the adjacent SLAM building (nos 332-334), which although part of the Conservation Area, has been somewhat compromised by alterations to its façade. Together with the garage site (no 330), this will provide an opportunity to link the design concept of 'We are 336' across the three frontage sites and legitimise its presence in this location.	Noted.
Lambeth Accord	R0149	Other	We support the suggested layout of the proposed replacement buildings for the four sites with a central amenity area, although we appreciate that this layout is only indicative.	Noted.
Lambeth Accord	R0149	Other	We agree that the heights of buildings should correspond with the frontage building of 336 Brixton Road, subject to day light and sunlight considerations. In particular, we accept that this should include some lowering of the height adjacent to the gardens of Beddington House and the listed building at 338 Brixton Road, to prevent overdominance. In addition, there should be sufficient set back of buildings adjacent to the gardens of St George Mews to avoid overshadowing.	Noted. Matters relating to amenity will be scrutinised at application stage in accordance with Local Plan policy Q2.
Lambeth Accord	R0149	Other	There is a much-needed east-west pedestrian route across the site to link with buses on Brixton Road, since nearby routes to the south are gated.	Officers disagree. There is an adequate existing route via Winans Walk to Brixton Road. The provision of a new public route through the site is not considered necessary.
Lambeth Accord	R0149	Other	We also support the introduction of a reasonable width footway to the east side of Winans Walk, which runs along the rear of the site, intended to enhance the residential character of this part of the site. However, we would point out that with the retention, particularly of light industrial uses in the scheme (as well as the Royal Mail premises to the north); Winans Walk will still to some extent continue to function as a service road (even more so, if some of the frontage of the site is converted into gardens).	Noted. It is accepted that Winan's Walk will continue to function as a service road to some extent, but options to improve the pedestrian environment will be explored as part of any future development of the site.
Lambeth Accord	R0149	Other	Considerations for 'We are 336' We have no objection to retaining the façade enter the building at ground level.	Noted.
Lambeth Accord	R0149	Other	We agree that the current building line should be retained with buildings set back from Brixton road, but do not feel that it is necessary to restore the leafy front gardens in this vicinity, which are much more associated with the Georgian houses in the Conservation Area. In our case, it is essential that we retain the small carpark for disabled people at the front of 'We are 336' where it can be directly accessed from Brixton Road, especially as the vehicular access at the rear via Winans Walk	It is considered that there is both scope for the provision of disabled parking AND the improved greening of the Brixton Road frontage. Accepted. Further clarity will be provided on the location and nature of disabled parking. This is proposed to say "The design should allow for sufficient disabled parking to meet the needs of the building's users, subject to an evidence justification"

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			and Wynne Road is very indirect. It is also important that disabled visitors use the same entrance as everyone else. Instead, the removal of the ramp to 'We are 336' will allow for a sizeable band of planting to soften what some would regard as a rather stark elevation. We therefore propose that an alternative to the grassed frontage, would be dense perimeter planting with a central access and attractive hard landscaping behind, suitable for a maximum of ten blue badge holders and bikes.	
Natural England	R0163	General	Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.	Noted.
Transport for London Spatial Planning	R0312	Other	Brixton Road forms part of the TLRN. Any changes to access and proposals for transport interventions on the TLRN will need to be assessed by, and subject to, TfL agreement. The A23 Streetspace scheme extends past this site, although no changes have been made to road layout at this location. No servicing should take place from the Brixton Road frontage and, as such, we would support a clearer requirement for servicing to be from Winan's Walk (to the rear). We would also strongly support removal of all vehicle crossovers to allow for an improved public realm and footway on Brixton Road. This could be included in a section 278 agreement with TfL. We welcome confirmation that Local Plan and London Plan parking standards will apply.	We note TfL's position on servicing but given the constrained nature of Winan's Walk alternative servicing options may need to be explored. We support a reduction in car parking and crossovers fronting Brixton Road but it's likely that essential disabled car parking needs will be provided on Brixton Road frontage.
Mums for Lungs	R0501	Site Allocation Policy	We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document. We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings. As acknowledged by Lambeth cabinet last November, "Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough." Therefore, we urge Lambeth council to	One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes'. These strategic overarching principles are also applicable to the SADPD PSV. The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy S11. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.

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			consider our concerns regarding the Draft Site Allocation Development Plan Document. Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.	The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth's Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council's work.
Mums for Lungs	R0501	Transport	Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough. We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?	Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.
Mums for Lungs	R0501	Transport	In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal. Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It's equally essential for the Planning department of the council, its Transport department and TFL to work very closely together. Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO). We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us. With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth council so that they become a tangible, positive reality for everyone living and working in the borough.	In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking. Other London Plan policies will be applicable, such as Policy T1 'Strategic approach to transport', T2 'Healthy streets' and T5 'Cycling', that set the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.
Brixton Society	R0689	Other	Land Uses/ Employment Space: We are opposed to the loss of 336 Brixton Road and the adjacent mental health facility – the adverse impact on community services will be devastating. The number of petrol filling stations in Inner London has been declining	The site allocation policy seeks to retain We are 336 and SLAM's services at the site. The allocation will seek to better optimise site capacity. Existing community uses and social infrastructure on site will be expected to be re-provided to equivalent or better functionality, unless these are delivered

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			over the past 20 years, but the early removal of that at No.330 should not be encouraged. While electric vehicle use is growing, it is still very much in a minority, constrained by the lack of charging points. Introducing housing to site 17 would limit the scope for business uses on site.	elsewhere as part of an agreed strategy, in line with Local Plan Policy S1. Petrol Filling Stations are not protected by Local Plan or London Plan policy. Development brought forward on this site will be required to re-provide the existing quantum of floorspace for the current office and industrial floorspace on site, in accordance with Local Plan and London Plan policy. This should provide an opportunity to increase overall development capacity on the site, while ensuring the design of the new residential units must not compromise the viability of any employment uses.
Brixton Society	R0689	Other	Heritage Assets: 336 Brixton Road is a rare surviving example of a design by the late Owen Luder PPRIBA. This brutalist style is now becoming better appreciated and should be retained. The only issue with the adapted 332-334 Brixton Road is the central porch, which was approved by the Council despite our criticism of the design. We would support a more sympathetic redesign of this element, but we prefer to retain the original façade as a whole.	Noted.
Brixton Society	R0689	Other	Building Heights, Views, Townscape: The site proposals are vague about building heights, and the reference to stepping down from the present No.336 should be strengthened.	Accepted. We have revisited the policy wording to ensure no ambiguity.
Brixton Society	R0689	Other	Improvement of the main road frontage, including more soft landscaping, would be welcome.	Noted.
Brixton Society	R0689	Other	Transport/ Public Realm: Improvement of Winans Walk should be a requirement for any adjacent development, but effective use for rear servicing would probably require a hammerhead turning bay at the southern end.	Accepted. The policy text has been amended to note the need for adequate turning.
Brixton Society	R0689	Other	Energy & Environmental issues: The potential demolition of No.336 is to be deplored because of the high embodied carbon in its concrete construction. Instead it requires better insulation, combined with more efficient heating and ventilation systems more suited to its current uses.	Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 (optimising site capacity) and SI7 (Reducing waste and supporting the circular economy) would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land), an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building. London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG further require referable applications to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting

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				<p>from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are both strongly encouraged.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p> <p>There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London.</p> <p>This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.</p>
GLA	R0852	Other	<p>This site contains light industrial uses, medical services and offices but is not designated as LSIS. The Mayor welcomes the intention to protect existing industrial capacity. The site allocation proposes offices uses as part of a mixed-use re-development, however the site is not located within a town centre. To be consistent with Policy E1D of the LP2021 office development should be focused in the CAZ, town centres and existing office clusters, where supported by improvements to walking, cycling and public transport connectivity.</p> <p>As the site is located within Brixton Creative Enterprise Zone (CEZ) LP2021 Policy E3 applies. The site allocation should refer to the requirements of Part A, specifically for affordable workspace for sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace.</p> <p>As part of the site contains undesignated industrial uses, Policy E7C of the LP2021 applies and should be reflected in the proposed allocation.</p> <p>As the borough is in the Central Services Area (CSA), there should be a greater focus on the need to provide essential services to the CAZ in accordance with paragraph 6.4.7 of the LP2021 and this should be incorporated into the allocation. These services include sustainable last mile distribution/logistics, 'just-in-time' servicing among others.</p> <p>It is noted that an affordable housing threshold of 38% has been set</p>	<p>The draft site allocation requires re-provision of the existing quantum of office floorspace. This is consistent with Local Plan policy ED1, which was in turn found sound and in general conformity with the London Plan.</p> <p>Where there are existing offices in Lambeth, even outside of town centre locations, these are protected in policy. However, we would not support an uplift in office floorspace in an out of centre location (unless the requirements of the sequential test were met). It is also important to recognise that the existing office space is owned and occupied by Lambeth Accord/WeAre336, which is a social enterprise with expertise in providing support, and letting space, to people with disabilities. They wish to remain on the site following redevelopment, so to require a loss of offices would render the allocation undeliverable and would result in objections from a key landowner.</p> <p>London Plan policy E3A makes clear that planning obligations may be used to secure affordable workspace in defined circumstances set out in parts B and C of the policy. Parts B and C refer to areas and policies identified in Development Plan Documents. Lambeth's affordable workspace policy is set out at ED2 of the Lambeth Local Plan 2021. It applies to a net uplift in office floorspace in defined locations in the borough based on the viability evidence that was tested at examination. It does not apply to new light industrial floorspace because development values for that use were not</p>

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			across the site as a whole (as an average). The site allocation should make it clear that the 50% threshold only applies to that land which is considered to be 'public land' for the purposes of the Mayor's threshold approach and not the land in private ownership where the 35% threshold will apply i.e. different thresholds should apply to the relevant parts of the site. The 50% threshold will also apply to those parts of the site which are currently industrial where residential development would lead to a loss of industrial capacity.	found to be strong enough to justify an affordable workspace requirement. Local Plan policy ED3 would therefore not apply to the proposed approach set out in the draft site allocation for this site (a net uplift if office floorspace would not be supported), which is why it is not referenced. London Plan paragraph 6.4.7 is noted and was fully acknowledged throughout the preparation and examination of the Lambeth Local Plan 2021. However, it does not follow that every site in use as non-designated industrial land with potential for mixed use redevelopment will be suitable for sustainable 'last mile' distribution/logistics, 'just-in-time' servicing, waste management and recycling or uses to support transport functions. It would not therefore be reasonable to require all sites to provide these uses. This site is tightly constrained and it may be difficult for an applicant to include these types of uses, rather than light industrial workspace, alongside residential. To require them in this case could render the site undeliverable. It should also be noted that this site is within the Brixton CEZ, so the priority requirement would be for light industrial space suitable for creative and digital enterprises. It is very unlikely the site could accommodate both that type of space and uses that service the CSA. With regards to the comment about affordable housing thresholds, Lambeth officers consider that the existing wording in the draft SADPD is very clear on this subject and does very explicitly address the points raised. Please can the GLA clarify this comment and propose a solution for Lambeth officers to consider?
Environment Agency	R0886	Other	Current flood zone designation: 1 Rivers on / adjacent to site / flood defences: No Permitted waste site within 250 metres: No Groundwater Source Protection Zone: No Comments to add into site allocation text: Protect groundwater from contamination sources	Accepted. Add as last sentence to flood risk mitigation text: 'Protect groundwater from contamination sources'
Cllr J Meldrum	R0945	Site Allocation Policy	I am surprised you want to "Retain the frontage building at no. 336 Brixton Road as a positive contributor to the conservation area" My recollection is that this was built as the compute centre for Coutts bank.	Noted
Cllr J Meldrum	R0945	Site Allocation Policy	The disabled access is very poor and should be much improved with a new entrance. Parking needs to be adjacent for disabled access.	Any redevelopment of the site will be required to meet planning policies and building regulation requirements in relation to inclusive environments and accessibility, including London Plan Policy D5 and Lambeth Local Plan Policy Q1 and Q6. Accepted. Further clarity will be provided on the location and nature of disabled parking e.g. 'Ideally principal entrance and disabled parking will be on the Brixton Road frontage. Any other solution would need to be robustly justified.'

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Cllr J Meldrum	R0945	Site Allocation Policy	The windows are not energy efficient and open at floor level making it unsafe .	Any refurbishment of no. 336 would very likely include new windows to modern day standards.
Cllr J Meldrum	R0945	Site Allocation Policy	I am sure you will have lots of comments from the many users of 336. Is the idea to replace or retain 336 as a VCS hub?	Noted, the Site Allocation policy seeks to re-provide the existing community and office floorspace thereby enabling existing users to remain on the site. The council will continue to engage with the land owners and current occupants.
Cllr J Meldrum	R0945	Site Allocation Policy	Disabled parking is essential for a VCS hub. Using public transport is 5 times slower for disabled people.	Accepted. Further clarity will be provided on the location and nature of disabled parking. This is proposed to say "The design should allow for sufficient disabled parking to meet the needs of the building's users, subject to an evidence justification"
Cllr J Meldrum	R0945	Site Allocation Policy	Policy should include a decant policy for current VCS occupiers.	Noted, the Site Allocation policy reprovides the existing community and office floorspace thereby enabling existing users (including Voluntary and Community Sector uses) to remain on the site. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected.
Cllr J Meldrum	R0945	Site Allocation Policy	Please also mention Policy ED2 on affordable work space - any new build is going to have higher rents.	Lambeth's affordable workspace policy is set out at ED2 of the Lambeth Local Plan 2021. It applies to a net uplift in office floorspace in defined locations in the borough. The SA policy only allows for existing office floorspace to be re-provided. No uplift on office floorspace would be supported in this location because the site is outside of a town centre. This is why policy ED2 is not referenced in the SA policy.
Individual	R1257	Other	<p>I live on Tulse Hill estate. I am totally disturbed by the proposals for specifically Sites 18 and 19 along with Sites 7, 17, 20 and 21 and, to be honest, the whole plan!!! I feel that it's as if Lambeth Council is living in a dream and that as long as words like 'affordable housing' and 'flexible workspace' are used, you can carry on with simply carrying on. It's as if you have not noticed that we are living in a climate emergency!! All building needs to stop. There are alternative solutions!! Housing can be created by refurbishing buildings that already stand. We don't need more workspace - flexible or otherwise.</p> <p>These thoughts go along with my personal view that there has not been enough public consultation - we needed to see real plans. I am very disturbed by your ignorance - you ignore the state of the planet, you ignore the people, you ignore your responsibilities and - I just get the impression that as long as you can keep going with your plans, nothing else will matter. I object. Strongly!! I feel that</p> <ul style="list-style-type: none"> • there has been no adequate public consultation on these plans, • the buildings contravene Lambeth's own planning rules, • these developments overall would harm local communities and life 	<p>Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making.</p> <p>Legislation and Policy set by national Government require the Council as Local Planning Authority to enable and support sustainable development through the planning process. These national requirements also stipulate the general form and content of local plans.</p> <p>Paragraph 11 of the National Planning Policy Framework (NPPF) sets out that the development plan 'should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects'. The Plans requirements for affordable housing and flexible workspace are based on an assessment of local need, balanced against local viability.</p> <p>Lambeth needs to ensure that the right amount of flexible and affordable business space exists to support flexibility for small businesses and new</p>

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			<p>itself. It's time to be creating a whole new way of living and some places are doing exactly that. Have you heard of Doughnut Economics? Have you even considered a complete change of plan that would be more suitable to a planet that needs help and a system that needs change? You are damaging the environment, destroying mature trees, breaking up communities and more. You seem to be blind, ignorant and/or stupid. I apologise if that sounds rude but - I'm freaking out here as our lives are in your hands!!!</p> <p>Lambeth has been doing damaging processes similar to these for a long time. When will you start to care and act like reasonable, responsible people? How can you carry on making a total mockery of your own declaration of a 'climate emergency.'</p> <p>You claim to be a 'co-operative council' but it seems that there is no thought or vision for the community or for Lambeth as a whole. Please, hold some real consultations and think again. Please, take care of the people who voted you into position. Consider people and planet over profit. Stop working with only the property developers and start working for and with THE PEOPLE!!!</p>	<p>entrepreneurs.</p> <p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 (Optimising site capacity) and S17 (Reducing waste and supporting the circular economy) would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land), an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building. London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG further require referable applications to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are both strongly encouraged.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p> <p>There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.</p> <p>Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020.</p>

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				<p>A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version. There will be an opportunity for the public to comment on any further amendments to the draft SADPD under Regulation 19. All respondents will be made aware of this opportunity.</p> <p>Any future development brought forward on this site will be subject to further public consultation, with major applications required to provide a Statement of Public consultation, setting out who they have engaged with, and when and what manner consultation took place.</p>
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and</p>	<p>Noted.</p>

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			<p>time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>

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			Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.	
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> • Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO₂e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO₂e output. - 4-5% of the worldwide total of CO₂e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution • Steel Steel also has a significant impact on the environment: <ul style="list-style-type: none"> - It is CO₂e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and 	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			<p>should be recommended as build materials instead of emission heavy cement:</p> <ul style="list-style-type: none"> ● Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit “off-gas” toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. ● Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world’s riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber. 	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> ● Overheating, caused by the proliferate use of glass and a high concentration of inhabitants ● Increasing carbon energy required to offset this through mechanical ventilation ● Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) ● Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building 	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in</p>

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			<ul style="list-style-type: none"> • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise ‘skyscraper’ buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p> <p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p>
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council's commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not</p>	<p>Noted. Please refer to officer responses to previous points made as part of this representation.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <p>1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p> <p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p> <p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	

Officer Response to Reg 18 Representations: Site 17 – 330-336 Brixton Road SW9

Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R1347	Sustainability Appraisal	Dedicated space for deliveries & servicing the site generally to be located on adjoining streets to reduce street car storage. Car storage encourages car use	Noted. All servicing should be accommodated off-street. In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street (except Blue Badge holders).
Individual	R1422	Site Allocation Policy	Please do not take away our petrol station. It is the only one in the area. It gets lots of use.	Noted. There is no policy protection for Petrol Filling Stations.
Individual	R1426	Vision Map	To reconsider the architectural merit of Block 336 which is indicated as being retained on the site. The Brutalist style is not sympathetic to the other buildings in the conservation area and this is a missed opportunity to make a positive difference to the streetscape.	Noted.
Individual	R1530	Context	I think that no 336 is an impressive building - a monument to post-war architecture-which had, until recently, been allowed to deteriorate significantly. Anything that can be done to preserve and enhance it would be fantastic.	Noted.
Individual	R1609	Evidence	It is important to keep the Blue Badge car parking at the front of 336 Brixton Road. As this building house 17 disability charities and has lost of disabled people that use the building. The front car park is an important resource for the user of 336 building.	Accepted. Further clarity will be provided on the location and nature of disabled parking within the draft policy text.
Individual	R1620	Site Allocation Policy	The 'discordant' petrol station is also a valuable local grocery store and extremely useful to local residents. It overlooks one of the busiest roads in London much like thousands of other petrol stations. Perhaps if you were willing to reroute the A23 it would make some kind of sense to get rid of it to improve the area. But I suspect this is not going to happen rendering the scheme somewhat fatuous.	Noted. There is no policy protection for Petrol Filling Stations. The A23 is managed by TfL so remains outside of the scope of the LPA.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

General response to representations made by individuals and businesses

Consultation on the draft Site Allocation Development Plan Document (SADPD) took place between 10 January 2022 and 22 February 2022, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

A total of 3,308 representations were received from 1,876 unique respondents. Comments received were primarily focussed on the proposed site allocations with minor comments received relating to the SADPD generally. The majority of comments received (84.2%), related to Site 18 – 286-362 Norwood Road SE27 (1,317 comments, 39.8% of total representations made) and Site 19 – Knolly's Yard SW16 (1,470 comments, 44.4% of total representations made). Comments primarily objected to one or more aspect of the proposed allocation.

In summary, the main concerns relating to Site 18 – 286-362 Norwood Road SE27 advised:

- Site should be removed from SADPD to enable fuller engagement with the community.
- Development of the site will have a negative impact on the character and visual amenity of the area.
- Inadequate consultation undertaken/further engagement with the community required.
- Development included excessive building height.
- Development will have a negative impact on town centre/retail provision.
- The proposals will threaten existing housing areas within the site.

In summary, the main concerns relating to Site 19 – Knolly's Yard SW16 advised:

- Development of the site will have a negative impact on the character and visual amenity of the area.
- Site should be removed from SADPD to enable fuller engagement with the community.
- Development included excessive building height.
- Inadequate consultation undertaken/further engagement with the community required.
- Development will increase traffic and worsen air quality.

Full analysis of the comments made is set out in the Regulation 18 Consultation Report.

The SADPD has been updated to take account of comments received at Regulation 18 and where applicable has been informed by revised/updated evidence base documents. The key changes made to the SADPD Proposed Submission Version (PSV) in respect of Site 18 and Site 19 are summarised below (note this list does not detail minor changes such as typos).

Site No.	Site Address	Proposed Changes
Site 18	300 – 346 Norwood Road	<ul style="list-style-type: none"> • Site boundary amended to reduce scale of allocation and exclude existing housing at northeast corner and southwest corner, as well as the 'laundry' site, which is already under construction. • Reduction in the number of residential units proposed. Decreased from 390-470 units to 150-170 units. • Quantum of commercial/community floorspace including light industrial workspace, reduced from 5,000-7,000 sqm to 3,000-4,000 sqm to include at least 1,123 sqm GIA light industrial workspace (in order to achieve no net loss of existing industrial floorspace capacity). • Policy re-worded to make clear that inclusion within the site allocation boundary does not compel land to come forward for development. • Additional wording proposed to clarify that a tall building will only be considered appropriate on the site if certain conditions are met e.g., public benefits are achieved. • Inclusion of wording to make clear that the community use on the site should be re-provided, in line with Local Plan Policy S1. • No significant change to other development principles.
Site 19	Knolly's Yard, SW16	<ul style="list-style-type: none"> • Deputy Leader confirmed site to be removed. • Site no longer proposed for allocation.

The SADPD PSV will undergo a final round of consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prior to submission to Government for Examination. The consultation is accompanied by a suite of evidence base documents and includes a Regulation 18 Consultation Statement. This provides an overview of the consultation undertaken and includes a summary of representations made as well as Officer responses to such representations.

Given the large volume of representations received in respect of Site 18 it has not been possible to respond separately to each representation. A series of recurring topics have been identified, including:

- Nature of the consultation
- Perceived overdevelopment of the site
- Perceived negative impact on local heritage
- Concerns over design aspects of the proposal
- Concerns about the quantum of affordable housing proposed
- Perceived insufficient regard to the Climate Emergency and Net Zero objectives
- Concerns over possible impact on independent retailers, restaurants, cafés and creative businesses
- Concerns over impact on social, transport and green infrastructure
- Concerns over impact on traffic and parking availability and possible disruption during the construction phase

Please find detailed responses to each of these topics in the sections below.

With respect to Site 19, this site has been removed from the SADPD PSV. The Council is not currently developing a planning framework for this site and so the current designation in the adopted Local Plan will continue to apply. There is not a process within the SADPD to disapply such adopted policies. However, the Council intends to commence a review of the Local Plan later in 2024 and there will be an opportunity to discuss the status of other sites, including the former Site 19, as part of that process

1. Nature of the consultation

The purpose of the SADPD is to set a vision for Site 18 which outlines the basic parameters to guide any future development of the site. The SADPD is not a development proposal for the site. Development proposals will be put forward by applicants in due course and follow the standard planning application process.

The proposed site allocation builds up on previous work including the preparation of the 2007 Unitary Development Plan (UDP 2007), the production of the 2009 Masterplan, and the West Norwood and Tulse Hill: A Manual for Delivery, published in 2017. Although the Manual for Delivery is not a planning document, its findings have guided the preparation of the most recent Local Plan (2021) and the SADPD, with particular attention to the aspirations and priorities of the local community.

This work provided an extensive and valuable insight on local community aspirations and priorities, such as a desire to support the growth of the town centre and local businesses, to provide new mixed tenure housing, to improve public realm, pedestrian and cyclist permeability and public transport accessibility. This intelligence has informed the content of the SADPD.

With respect to public consultation, a Consultation and Engagement Plan for the Regulation 18 consultation of the Draft SADPD was agreed by Cabinet on 13 December 2021. This set out the key stakeholders for the consultation, primary and supplementary methods to seek stakeholder views during the consultation, methods to raise awareness about the consultation and encourage stakeholders to respond, and finally, how the results of the consultation would be reported on. In line with the council's Statement of Community Involvement 2020, a timeframe for the consultation was drafted, which ran from 10 January to 22 February 2022.

A Consultation Statement will be published alongside the SADPD PSV. This sets out in detail the methods the council used to raise awareness about the consultation and to encourage people to respond. The primary method used was Commonplace, the digital consultation platform used by the Council. Supplementary methods included engagement with ward councillors, local MPs, Area Meetings with representatives from community groups and organisations based in neighbourhoods where sites were proposed, presentations, and workshops with Young People.

Ward councillors were engaged in meetings on 8, 9 and 16 December 2021, all held virtually following government guidance on the COVID-19 pandemic. Local MPs were briefed on 21 January and 1 February 2022. In addition, both ward councillors and local MPs were invited to join Area Meetings. The Area Meeting for West Norwood was held on 24 January 2022. Following government guidance on the COVID-19 pandemic the Area Meeting was also held virtually. At these meetings ward councillors, local MPs, as well as representatives from community groups and local organisations were provided with the information necessary to support residents in accessing the consultation material and encouraged to disseminate information about the consultation to the wider community.

In addition to the above, the Council sent notifications by email to over 2,000 contacts, including statutory bodies and community stakeholders. The council also notified up to 1,141 groups through Integrate, a directory of voluntary, community and social enterprise sector organisations that

operate in the borough. The consultation was also publicised on social media platforms such as X (formerly Twitter), Facebook, Instagram, LinkedIn and Nextdoor, on a blog post on Love Lambeth and via online newsletters and bulletins. Hard copies of the Draft SADPD were also made available and displayed in public libraries and hosted on the council's dedicated website.

In light of the number of representations received in relation to Site 18 and Site 19, the Council organised three targeted stakeholder engagement workshops with representatives who had submitted responses to the Regulation 18 consultation. These were held over a six-week period in October and November 2022. The workshops provided an opportunity for council officers and Members to further explore the points raised in the Regulation 18 representations and have informed the council's approach to the revised boundary and development aspirations for Site 18, which are outlined on the SADPD PSV.

The SADPD PSV will undergo a final round of consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prior to submission to Government for Examination. As set out in Lambeth's Statement of Community Involvement, further opportunities for community involvement will be available along the planning application process when parcels within Site 18 come forward for redevelopment. These include opportunities for community involvement led by the developer or applicant, who are encouraged to engage with the community and stakeholders before submitting any application. The planning application process also allows for members of the community and community groups to submit representations during the planning consultation period.

2. Perceived overdevelopment of the site

Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way and is in line with national policy guidance.

West Norwood is located between two train stations, West Norwood and Tulse Hill stations, and along a road heavily serviced by bus routes connecting the area to central London. As a result, West Norwood is rated PTAL 6a, the second highest accessibility score in London. This is seen as an opportunity to promote higher density development in line with Policy D3 of the London Plan.

As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities.

Higher densities and taller buildings, despite bringing change to the character of the area, are seen as an opportunity to deliver the local community's aspirations and priorities, including the growth of the town centre and the local economy and the provision of mixed tenure housing.

As previously stated, it is not expected the site will be developed at once. Instead, the most likely scenario is that where separate planning applications affecting specific parcels within the site are submitted independently by different applicants at different times. It is therefore expected that the site will be developed gradually allowing existing businesses and residents to adapt and a mix of architecture to come forward. The change in the character of the area is expected to be an incremental change.

Following the Regulation 18 consultation, the massing and height of the buildings indicatively proposed for Site 18 have been amended. The general height the revised SADPD PSV proposes for the tall building located at the centre of Site 18 is 75 metres AOD, approximately 31 metres above ground level in that location given the sloping nature of the site. This translates into a building of between nine and ten storeys.

As per Local Plan Policy Q26, buildings above 25 metres in height are considered tall buildings for this part of the borough. This contrasts with areas of the borough north of the South Circular Road where only buildings above 45 metres in height would fall under the category of tall buildings. However, the 25-metre threshold it is not a limitation to the height of potential buildings south of the South Circular Road, but a threshold for their definition as tall buildings.

3. Perceived negative impact on local heritage

As previously indicated, the boundary for Site 18 has been modified to exclude the following properties:

- Thanet House,
- Snowe House,
- 294-298 Norwood Road, also known as Knowles of Norwood,
- 348-362 Norwood Road,
- 2-4 Lansdowne Hill,
- 6 Lansdowne Hill, also known as the Laundry site, now under construction pursuant planning consent 19/02840/FUL, and
- 8-20 Lansdowne Hill.

The massing and height of the buildings indicatively proposed for Site 18 have also been amended. This new massing scenario has been tested through a townscape and visual impact assessment seeking to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings, including

West Norwood Cemetery, St Luke's Church, locally designated views, and neighbouring conservation areas such as the West Norwood and the Lancaster Avenue Conservation Areas.

For more detailed responses in relation to each of those assets, please refer to responses to representations made by Historic England, MP Helen Hayes, Councillors Meldrum, Pickard and Winifred, Friends of West Norwood Cemetery, Lancaster Avenue Residents Association, and Norwood Action Group.

4. Concerns over design aspects of the proposal

As previously stated, the SADPD is not a development proposal for the site. Development proposals on any of the parcels within the site will be put forward by applicants and follow the planning application process. In due course, detailed proposals will be submitted indicating layout and height of buildings, as well as their design, appearance and materials. All those parameters will be material considerations when assessing the applications in line with the local Development Plan, which includes the London Plan, Lambeth Local Plan and, when adopted, the SADPD. Particular regard will be given to policies in Section 10 of the Local Plan, Quality of the built environment.

In terms of public realm, as indicated in the SADPD, future development should address existing open space deficiency by meeting the requirements of Local Plan Policy EN1(d). This policy will be applicable when assessing any future planning applications for the site.

As part of the preparation of the SADPD PSV, a further daylight, sunlight and overshadowing assessment of the revised heights and massing proposed for Site 18 was carried out. The assessments demonstrated little or no change in daylight to the vast majority of neighbouring properties surrounding the site. Where change in Vertical Sky Component (VSC) was noted, the retained VSC levels were considered good and in keeping with the surrounding area. Similarly, the assessment confirms there will be little overshadowing of neighbouring amenity areas, with the exception of Thanet House's rear gardens, which would see their sunlight availability noticeably reduced. It has also been demonstrated that the main square in its indicative configuration will receive adequate sunlight. This assessment forms part of the revised evidence base.

In due course, a daylight, sunlight and overshadowing assessment of the detailed proposals will be submitted as part of any future planning application. Proposals which meet the height and massing parameters set in the SADPD PSV are expected to result in similar outcomes in relation to daylight, sunlight and overshadowing. Other matters such as amenity, space standards, housing mix, landscaping, and noise pollution will be material planning considerations should planning applications come forward for the site in the future.

All existing and emerging policy, guidance and regulations will inform decisions on planning applications coming forward. These include requirements through the Building Regulations regime, particularly Approved Document B (Fire Safety).

5. Concerns about the quantum of affordable housing proposed

The number and tenure of affordable housing units proposed as part of any future planning applications of Site 18 will be assessed against London Plan policies H4, H5 and H6 and Lambeth Local Plan policies H2 and H4. The standard London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria. Alternatively, Viability Tested Route will apply for applications that do not secure the mentioned thresholds.

The application of the Fast Track Route would ensure that at least 35 per cent of all residential units proposed as part of major planning application will be affordable residential units, including low-cost and intermediate products. Where development occurs on publicly owned land, this percentage will increase to 50 per cent of all residential units proposed within the parcel. In both cases, of the total number of affordable residential units proposed, 70 per cent would be low-cost units (including Social Rent, also known as “council”, and London Affordable Rent products) while the remaining 30 per cent would be intermediate units (including London Shared Ownership and London Living Rent products).

The nature of the affordable housing products mentioned above is described in more detailed in the officer response to the representation made by Councillors Meldrum, Pickard and Winifred.

As per London Plan 2021 Policy H5 F, when an application does not meet the criteria to follow the Fast Track Route (i.e., proposing at least 50 per cent affordable housing on public land, or 35 per cent affordable housing on private land) it must follow the Viability Tested Route. This would require the applicant to submit supporting viability evidence in the form of a viability assessment that will determine the maximum level of affordable housing deliverable on the scheme. Lambeth Local Plan 2021 policy H2 (70 per cent low-cost affordable housing products and 30 per cent intermediate products) will also apply.

Lambeth Local Plan 2021 policy H4 sets out the mix of sizes expected from the low-cost component of the affordable housing provided on site. Not more than 25 per cent of the low-cost affordable housing units should be 1-bedroom units, between 25 and 60 per cent should be 2-bedroom units, while the rest should be 3-bedroom units or bigger units (family accommodation) up to a maximum of 30 per cent. Lambeth Local Plan is not prescriptive regarding the size mix of residential units under other types of affordable tenure and market units. However, Policy H4 of the Local Plan states that for market and intermediate housing, a balanced mix of unit sizes including family accommodation should be provided.

6. Perceived insufficient regard to the Climate Emergency and Net Zero objectives

Lambeth Council declared a Climate Emergency in January 2019 and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. Mitigation of, and adaptation to climate change is a key priority for the Council and is also central to the planning process, both in planning policy and decision-making. The Climate Action Plan sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030.

The Local Plan includes detailed policies on environmental matters including local food growing and production (Policy EN2), decentralised energy (Policy EN3), sustainable design and construction (Policy EN4), flood risk (Policy EN5), sustainable drainage systems and water management (Policy EN6) and sustainable waste management (Policy EN7). It also sets out transport policies to encourage and promote sustainable travel. These strategic cross cutting policies, along those in the London Plan, form part of the Development Plan and have informed the site-specific planning policies of the SADPD.

The SADPD also seeks to address site specific matters relating to flood risk mitigation, energy and sustainability, waste management, air quality and access to open space and nature conservation, urban greening and trees, as well as sustainable transport and movement matters. As an example, for matters relating to air quality, the SADPD refers to London Plan Policy SI1 and Lambeth's Air Quality Action Plan.

All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on Site 18.

7. Concerns over possible impact on independent retailers, restaurants, cafés and creative businesses

The revised boundary for Site 18 now excludes some of the retail and food premisses previously included. Only premisses located between 300 and 346 Norwood Road are proposed within the allocation. This includes one large retail unit, a total of seven smaller retail units and five small units in use as restaurants or fast-food takeaway outlets.

The SADPD PSV proposes 3,000 to 4,000 sqm (GIA) of commercial/community floorspace of which at least 1,123 sqm GIA are to be re-provided as light industrial workspace. This will allow for a variety of commercial unit sizes, including the provision of large-scale commercial units such as

the existing B&Q. The policy also requires at least 50 per cent of units along the Norwood Road frontage to be retail use. It is envisaged other town centre and community uses will help diversify and activate the high street.

Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. The council will encourage applicants to work with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected.

Maintaining the predominant retail function of the primary shopping areas in major and district centres will support the vitality and viability of the Lambeth's hierarchy of major, district and local centres, in line with Local Plan policy. Local Plan policy PN7 confirms shopping uses in West Norwood/Tulse Hill district centre will be safeguarded and encouraged.

Regarding affordable workspace, the 'West Norwood and Tulse Hill Business Space Demand Study' sets out the demand for creative and flexible floorspace in West Norwood. In line with this evidence base document and policy requirements, the SADPD acknowledges there is an opportunity to provide flexible workspace for creative businesses, to enhance the growing cluster in West Norwood and Tulse Hill.

Any future application within Site 18 will be assessed against London Plan Policy E3, which states that consideration should be given to the need for affordable workspace where there is affordable workspace on-site currently or has been at any time since 1 December 2017. Affordable workspace is defined as a workspace that is provided at rents maintained below the market rate for a specific social, cultural, or economic development purpose. This includes i) sectors that have social value such as charities, voluntary and community organisations or social enterprises, ii) sectors with cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace, iii) disadvantaged groups starting up in any sector, iv) activities that support educational outcomes through connections to schools, colleges or higher education, or v) start-up and early-stage businesses or regeneration.

Policy ED2 F of Lambeth Local Plan, clearly states that any proposals that involve the loss of existing affordable workspace will not be permitted unless the quantum of affordable workspace is replaced on-site or re-provided elsewhere in Lambeth on equivalent terms to the satisfaction of the council.

8. Concerns over impact on social, transport and green infrastructure

Site 18 is expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in the SADPD is supported by an Infrastructure Delivery Plan and the Community Infrastructure Levy (CIL) Charging Schedule 2022. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport (including cycling infrastructure) and green

infrastructure. In addition, site specific mitigation will be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021.

London Plan and Local Plan policies, alongside national planning policy guidance, will support the council's approach to safeguarding and improving social infrastructure and supporting new facilities where there are identified gaps in provision. For example, Local Plan Policy S2 requires all planning applications for over 25 residential units to submit a social infrastructure statement assessing the impact of the proposal on existing social infrastructure and including appropriate provision for any additional need that would arise from the proposal. Local Plan Policy S1, which safeguards existing social infrastructure, is now explicitly referred to in the SADPD PSV.

The SADPD PSV also sets out requirements in relation to highways and green infrastructure to ensure development proposals positively provide sustainable transport options and improve urban greening. In regard to sustainable transport, London and Local Plan transport policies will apply. These include, but are not limited to, London Plan Policy T5 relating to quantum and design of cycle parking, Policy T6 for maximum car parking standards, electric vehicle charging and Disabled Persons Parking requirement, and Policy T7 regarding Deliveries, servicing and construction, and Local Plan Policies T3 and Q13 on cycle parking, cycle hire membership and design, Policy T6 on car club membership and permit free developments, and Policy T7 regarding servicing on site.

Similarly, development should address biodiversity in accordance with Local Plan Policy EN1(c) and urban greening in line with London Plan Policy G5.

9. Concerns over impact on traffic and parking availability and possible disruption during the construction phase

Any future application for the development of any part of the site would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected impacts on the local road and public transport networks.

In line with London Plan policy T6 the development would be car-free and all new units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street if a Controlled Parking Zone (CPZ) were introduced. The number of vehicular trips generated by development on site would therefore be limited, helping to minimise impacts on parking, congestion and air quality.

The Transport Assessment would also be required to include a parking assessment incorporating parking surveys and an analysis of the parking impacts of the development. If necessary, additional parking controls such as the introduction of a CPZ may be secured in mitigation for the development, to be funded by the developer.

In relation to servicing, the revised vision included as part of the SADPD PSV clarifies service vehicles are expected to access off Lansdowne Hill and York Hill roads rather than along a trafficked route running north-south across the site. The proposed mix of uses is not expected to generate a significant increase in HGVs on surrounding residential roads.

Regarding the impact on Norwood Road amenities during the construction phase, a Construction Management Plan would be secured as part of any planning application. Impacts of construction traffic would be managed as part of the Construction Management Plan.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Lancaster Avenue Residents Association	R0018	Other	The Lancaster Avenue Residents' Association (LARA) represents the interests of the residents of Lancaster Avenue and Hawkley Gardens both within the Borough of Lambeth (SE27). Lancaster Avenue is a residential road consisting of houses of all sizes as well as blocks of flats. It also has a school, a nursery and special needs housing. The whole area of Lancaster Avenue has been accorded Conservation Area status and several of the houses in Lancaster Avenue have been designated as being of Historic Interest by Lambeth Council. Lancaster Avenue is not a road designed for or suitable for industrial and other heavy traffic whether HGVs or other smaller vehicles and it has seen a considerable increase in traffic following the implementation of various policies of the Mayor of London, Transport for London and Lambeth Council. The Lancaster Avenue Conservation Area is not the only conservation area in West Norwood or close to Norwood Road.	Noted.
Lancaster Avenue Residents Association	R0018	Other	LARA has recently been informed of the plan proposed by Lambeth Council to permit the building of two tower blocks; one in Norwood Road opposite the end of Lancaster Avenue and one in Knollys Road. Both of these will have an immediate adverse impact on Lancaster Avenue including volume and size of traffic. Both will have an adverse impact on the amenities in Norwood Road particularly during the building process and also after the building is complete. Lancaster Avenue will inevitably see an increase in traffic and a demand for parking which it does not have facilities for. West Norwood will suffer blight until the buildings are complete.	Noted. Please refer to officers' response to LARA's detailed objections below.
Lancaster Avenue Residents Association	R0018	Other	LARA has no objection in principle to the development and improvement of sites within West Norwood for residential purposes but strongly objects to plans which would, if allowed, constitute over development with no real concern for the residents of West Norwood or for any infrastructure in the area. These proposals, if allowed, will be entirely out of keeping with the whole area of West Norwood and in particular Lancaster Avenue. As such they appear to be contrary to all previous policies of Lambeth Council including the designations of Conservation Areas and houses of Historic Interest.	Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. West Norwood is located between two train stations, West Norwood and Tulse Hill stations, and along a road heavily serviced by bus routes connecting the area to central London. As a result, West Norwood is rated PTAL 6a, the second highest accessibility score in London. This is seen as an opportunity to promote higher density development in line with Policy D3 of the London Plan. As recognised in Lambeth's Local Plan 2020-2035, although higher density does not necessarily imply higher rise, taller buildings are one form of higher density development that can be appropriate for some uses and in some locations, subject to excellent design, protection of strategic views,

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>good public transport accessibility and consideration of the impact on the surrounding area.</p> <p>The approach to the site has been revisited following the consultation and new massing scenarios tested through a townscape and visual impact assessment. These were to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Please see the revised evidence document for further information.</p>
Lancaster Avenue Residents Association	R0018	Other	<p>LARA fully supports The Norwood Forum, Norwood Action Group and Norwood Planning Assembly in their objections to these proposals. The principal objections of LARA are:</p> <ul style="list-style-type: none"> •The over intensive use of the site producing exceptionally high levels of traffic, and •The locations of the sites and road access to them is not suitable, and •The inevitable significant increase in larger vehicles traveling to and from the site along roads that are unsuitable for such levels of, and types of, traffic resulting in negative environmental effects of congestion and pollution. The idling of lorries queuing to access the proposed sites from Lancaster Avenue and elsewhere will most certainly affect all residents and non-residents using facilities situated in Lancaster Avenue especially those attending the nursery and the school, and •Lancaster Avenue already suffers from excessive numbers of HGVs and other traffic causing noise, vibration and air pollution. LARA has made representations about this on a number of occasions and the problems are likely to get substantially worse as the introduction of the ULEZ, local LTNs and other road closure schemes come into effect. These new proposals from Lambeth Council would substantially increase the level of HGVs and other waste carrying vehicles using Lancaster Avenue and will increase all resulting problems. 	<p>Any future application for the development of any part of the site would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected impacts on the local road and public transport networks.</p> <p>In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street if a Controlled Parking Zone (CPZ) were introduced. The number of vehicular trips generated by development on site would therefore be limited, helping to minimise impacts on parking, congestion and air quality. The Transport Assessment would also include a parking assessment incorporating parking surveys and an analysis of the parking impacts of the development. If necessary additional parking controls, such as the introduction of a CPZ, may be secured in mitigation for the development, to be funded by the developer.</p> <p>Regarding the impact on Norwood Road amenities during the construction phase, a Construction Management Plan would be secured through a condition linked to any planning consent granted to a major planning application within Site 18. The impacts of construction traffic would be managed as part of the Construction Management Plan.</p> <p>The proposed mix of uses is not expected to generate a significant increase in HGVs on surrounding residential roads.</p>
Lancaster Avenue Residents Association	R0018	Other	<p>LARA has some specific requests that should be implemented:</p> <ul style="list-style-type: none"> •Site 18 and Site 19 of the Development Plan must be struck out from it, and 	<p>In response to this and other representations Site 19, also known as the Knolly's Yard scheme, is no longer being progressed as a Site Allocation site.</p>
Lancaster Avenue Residents Association	R0018	Other	<ul style="list-style-type: none"> •Lambeth Council should abide by the five year 2021 Lambeth Local Plan, and •Lambeth Council should abide by its previously published policy for tall buildings south of the South Circular, and 	<p>As stated in Local Plan 2021 Policy Q26, two thresholds apply for a building in Lambeth to be considered a tall building depending on whether they are located south or north of the South Circular Road. North of the South Circular Road, only those buildings that are 45m high or higher would be considered tall buildings, while south of the South Circular Road buildings that are 25m or over in height are considered tall buildings. The same Policy Q26 makes clear that additional locations appropriate for</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				tall buildings (any building 25m or over in height in the case of West Norwood) may be identified in site allocation policies. Please see in particular the last sentence of paragraph 10.128, which states 'The council is also preparing a Site Allocations DPD which may identify sites suitable for tall building development'. Part B of the policy also addresses applications for tall buildings outside of the locations identified in Annex 10 or as identified in site allocations.
Lancaster Avenue Residents Association	R0018	Other	•If these proposed plans or any variation of them should be contemplated they should be “plan led” and should be “part of a comprehensive scheme that integrates well with the locality” including, but without limitation, Lancaster Avenue.	Site Allocations Development Plan Documents are statutory development plan documents and form part, once adopted, of the local Development Plan, this is the London Plan and the Local Plan in Lambeth’s case. As Local Plans, SADPDs need to go through all stages of the plan making process, including the examination process, by which the SADPD is submitted to the Secretary of State who appoints an Inspector to carry out an independent examination. The independent examination assesses whether the SADPD has been prepared in accordance with legal and procedural requirements and if it is sound. Development plan documents are considered ‘sound’ if they are: a) Positively prepared b) Justified c) Effective, and d) Consistent with national policy.
Lancaster Avenue Residents Association	R0018	Other	I am a resident of West Norwood, have been for over thirty years, and I demand that your proposals for so called sites 18 and 19 be removed from this consultation immediately. They are wholly inappropriate for this area. Please ensure that new plans are developed in consultation with the local community. Consultation which has been lacking up to this point.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council’s Statement of Community Involvement 2020 and in line with the Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD as agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the SADPD Proposed Submission Version. The report explains in detail the methods the Council used to raise awareness about the consultation and to encourage people to respond. The primary method used was Commonplace, the digital consultation platform used by the Council. Supplementary methods included engagement with ward councillors, local MPs, Area Meetings with representatives from community groups and organisations based in neighbourhoods with a site in the SADPD, presentations, and workshops with Young People. Ward councillors were engaged in meetings on 8, 9 and 16 December 2021, all held virtually following government guidance on the COVID-19 pandemic. Local MPs were briefed on 21 January and 1 February. Both ward councillors and local MPs were invited to join Area Meetings. The Area Meeting for West Norwood was held virtually on 24 January 2022 following government guidance on the COVID-19 pandemic. Ward

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>councillors, local MPs, as well as representatives from community groups and local organisations were provided with the information necessary to support residents in accessing the consultation material and encouraged to disseminate information about the consultation to the wider community. Council's own publicity and dissemination methods included i) notifications by email to over 2,000 contacts, including the statutory, specific and general consultation bodies required by the regulations, but also community stakeholders, ii) publications on social media platforms such as Twitter, Facebook, Instagram, LinkedIn and Nextdoor, iii) a blog post on Love Lambeth, iv) online newsletters and bulletins, v) physical copies of the draft SADPD displayed in public libraries, and vi) a dedicated website. The Council also notified up to 1,141 groups through Integrate, a directory of voluntary, community and social enterprise sector organisations that operate in the borough.</p> <p>Following the consultation, the Council organised three targeted stakeholder engagement workshops with representatives of the community stakeholder groups that had submitted responses to the Regulation 18 consultation on draft sites 18 and 19 in West Norwood/Tulse Hill. These were held over a six-week period in October and November 2022. These workshops provided an opportunity for Council officers and members to explore further the points raised in the Regulation 18 representations with local representatives. These workshops have helped inform the Council's consideration of the Regulation 18 consultation responses received and the resulting content of the SADPD Proposed Submission Version for Site 18.</p>
Individual	R0020	Other	<p>Please register my objection to the proposed development on Norwood road, known as site 18.</p> <p>As a long standing resident of West Norwood, I am seriously concerned about the impact the proposed development will have on my neighbourhood.</p> <p>I am concerned about the extremely short consultation time – 6 weeks is not long enough for such a big development. It makes me wonder if the council are trying to slip this development through without proper consultation.</p> <p>The enormous size of the development – it will change the nature and look of West Norwood with an imposing development.</p> <p>What about the environmental impact – how does the demolition of buildings fit with Lambeth policy on the Climate Emergency? The council are meant to be taking this seriously but the plans for site 18 don't support this.</p> <p>Affordable housing – will the new residences on Site 18 be 'affordable' or market rate? I recognise the need for housing in the borough but this proposal does not seem to have been well thought through.</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0023	Other	I am very concerned about the nature of the site as I am on the owner of 334 and 332 Norwood Road.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0024	Other	<p>These two proposed developments are: (1) against the previous commitments given by the Council, they are (2) inappropriate to the history and community of Tulse Hill and West Norwood, (3) they are on a scale and in a form that puts unsustainable strain on our services and infrastructure, (4) they will drive out local small industry employers through loss of workspace, and (5) the local community has repeatedly said it is against this type of development in the area.</p> <p>Streatham and West Norwood are mercifully free of high rise developments. They are hideous, lack human scale, and totally against the kind of area local residents want to inhabit.</p> <p>Lambeth council seems intent on ruining this part of the borough. Please heed the wishes of the residents for once.</p> <p>I want to object most strongly to this proposed development, and firmly believe these plans should be scrapped.</p> <p>This development is utterly inappropriate for the area, as the impact would be extremely detrimental to this district. The scale is completely out of context, and would destroy the character of the neighbourhood. The high density and tall buildings would irreparably damage the area. The towers you are proposing to build would be visible for miles, and impact on at least five conservation areas, and their height will block the daylight from hundreds of existing homes, and destroy their privacy. Lambeth Council claim to be seeking affordable housing, which is totally misleading, as the high construction costs would make this impossible to achieve.</p> <p>This will cause a huge impact on local road congestion and air quality, due to the enormous number of extra vehicles which would be using the development. Lambeth claims this to be a car-free development, whilst stating there will be 100 additional cars, but no new parking.</p> <p>This development will require the removal of specially protected trees and valuable wildlife.</p> <p>Lambeth Council has completely ignored previous community consultations, and has given insufficient time to engage the community in understanding the impact of this damaging and totally inappropriate development.</p> <p>The local authority seems to be determined to destroy the pleasant nature of this area.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0026	Other	I am a West Norwood resident (I live at [address redacted]) and would like to submit my concerns about and strong objections to the proposed plans (in the Lambeth Draft SADPD) for my local area of West Norwood and Tulse Hill (Sites 18 and 19).	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Specifically, I am concerned that:</p> <ul style="list-style-type: none"> - all previous consultations on the future plans for West Norwood have been ignored - there is an unacceptable lack of new consultation - especially to take into consideration the impact of the Covid-19 pandemic on how we live our lives. <p>I object to the current plans, as set out in the Lambeth Draft SADPD, because the visual impact, the scale and the bulk of the proposed developments, including unacceptably high tower blocks, is not in keeping with what is a suburban, low-rise neighbourhood, and this will cause:</p> <ul style="list-style-type: none"> - loss of character to our neighbourhood - unacceptable overlooking of residential properties and conservation areas - increased pressure on local infrastructure and services - the removal of important local businesses such as mechanics/car-repairers, scaffolders etc. 	
Individual	R0027	Other	<p>I am a West Norwood resident (I on Lancaster Avenue, SE27) and would like to submit my concerns about and strong objections to the proposed plans (in the Lambeth Draft SADPD) for my local area of West Norwood and Tulse Hill (Sites 18 and 19).</p> <p>Specifically, I am concerned that:</p> <ul style="list-style-type: none"> - all previous consultations on the future plans for West Norwood have been ignored - there is an unacceptable lack of new consultation - especially to take into consideration the impact of the Covid-19 pandemic on how we live our lives. <p>I object to the current plans, as set out in the Lambeth Draft SADPD, because the visual impact, the scale and the bulk of the proposed developments, including unacceptably high tower blocks, is not in keeping with what is a suburban, low-rise neighbourhood, and this will cause:</p> <ul style="list-style-type: none"> - loss of character to our neighbourhood - unacceptable overlooking of residential properties and conservation areas - increased pressure on local infrastructure and services - the removal of important local businesses such as mechanics/car-repairers, scaffolders etc. <p>I am a resident of West Norwood and I request that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0028	Other	<p>I write as a very concerned citizen who is, frankly , amazed and furious about the proposed development of a new town centre for West Norwood.</p> <p>Firstly I am concerned about the increased traffic that the build will bring. Any proposal to build 400-500 homes will create huge disruption, noise, pollution, traffic to the surrounding area. I live on York Hill which already has more traffic than it can handle (buses, huge lorries, as well as it being treated as a through road by very fast drivers). Knollys road is equally small and will be equally overrun by construction traffic. Our neighbours wall was crashed last Dec by an errant bus driver due to traffic-maybe next time a child will be on that pavement? The noise alone is enough to cause huge mental health issues for a vast number of current residents. A build over several years will be an absolute disaster for a huge amount of residents.</p> <p>There is no mention of parking. Where are these 500 home owners supposed to park? I have problems enough parking outside my own front door and the surrounding roads (eg Broxholme road) is already a one lane of traffic through fare only due to the parking issues. Presumably you believe the roads around can absorb the extra 500 cars-they cannot!</p> <p>The traffic on Norwood high street is already jammed. The one way route makes it vastly more so. The new steelworks in Windsor grove which Lambeth SHAMEFULLY went ahead with -DESPITE huge uproar from locals will make it EVEN WORSE. How do Lambeth council believe this is for the best for residents?</p> <p>The local infrastructure cannot withhold this. It is already impossible to get a GP appt. the trains will be overrun as services have been cut. How about schools? Dentists? There simply are not enough. As for Thames Water-we have works going on within 500m from our house on and off for 3 years, continually digging up areas that they just worked on and cutting off access again and again, how on earth can these old pipes supply 500 more homes?</p> <p>I am simply LIVID that this proposal is even going ahead and wish to register my disgust loudly and clearly.</p> <p>I am a resident of West Norwood and I demand the proposals for site 18 and site 19 are removed from this consultation and new plans developed with the involvement and consideration of local community. There has been no adequate public consultation. For such a huge development there needs to be input from people who live in the area and have a say on how this will impact them during the build and afterwards.</p> <p>This totally destroys the character of the local area. I moved here for the</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			community feel, the quiet, the views, the charm - this will all be destroyed. This threatens local homes and businesses. There are dozens of businesses who have been here for generations, this will kick them out. The environmental noise and traffic will have a hugely negative impact on people who live here There is no reference to Lambeth's Net Zero target for 2030- in fact it is at odds to it. There is no vision for a town centre that is fit for 2050 and beyond. You are consulting on a high density plan that would replace 25% of our town centre with huge blocks including an 11 storey tower that breaks Lambeth's own planning rules!!	
Individual	R0033	Other	I am writing to OPPOSE the proposals for sites 18 and 19. There may be good things about these proposals, but there has been insufficient public consultation to establish whether these proposals are in local people's interests or not. Neither the extent of who has been consulted, nor the timescale, are sufficient. Despite the fact that I have signed up fo Council updates and live in West Norwood, I have not received any notification of these proposals. For such major developments, the council needs to follow its own Statement of Community Involvement and properly involve the West Nowood community in discussing the proposals. You could start by displaying the plans in West Norwood library and having a public meeting.I am a resident of West Norwood and I demand that the proposals for sites 18 and 19 are withdrawn and instead put out to proper and effective consultation of the residents of this area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0038	Other	I would like to register my grave concern and total opposition to the proposed Site 18 and Site 19 developments. This is for two main reasons: 1) I do not see how a council billed as "the cooperative council" has developed either project in partnership with the local community. 2) I think the two wildly excessive projects will ruin the heart and soul of West Norwood and dominate and totally overwhelm the area. I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0039	Other	I'm writing to oppose the current development of Site 18 and Site 19 in West Norwood and to ask for a proper consultation.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0040	Other	Hope you are well. I would like to voice my concern about not only the upcoming consultation for redevelopment of various sites in the West Norwood area (mostly that proposals are for high rise, which would be awful in this zone 3 suburban area) but also for the poor quality of the 'design' of buildings.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Why in such an historic area with many beautiful buildings, would we want more of this: [picture attached].</p> <p>This block was completed in West Norwood in 2021.</p> <p>I really like well designed and well constructed modern architecture, but the above isn't that! You can see it's an eyesore, and the top left of the building is already mouldy. It's months old. There will likely be damp problems soon (flat roof cheap but not great to look at or for function). It was 'designed' by an architect firm in Wimbledon. Hope they don't get hired again.</p> <p>I'd love our area to get better. Redevelopment is welcome and needed in some parts, but anything that makes the area worse- what's the point in that? Apart from deals making people that don't live here a quick and significant buck?!</p> <p>Please help this area to be a nice place to live for those who are already here, and for any new residents. I wouldn't wish that building on anyone...</p>	
Individual	R0043	Other	I am writing to ask for site 18 and 19 to be removed from the planning consultation. The high rise buildings are totally inappropriate for the area and would spoil our local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0045	Other	<p>We object to the plans and demand that Lambeth remove Site 19 and Site 18 from the SADPD on the basis that ,should they go ahead,they would have an enormous negative impact on the whole surrounding area.</p> <p>The scale of the development is totally disproportionate to the architecture of the whole area, the buildings are too tall and they would totally destroy the character of the area. But especially they would have a massive pressure on the whole community affecting badly on transports , traffic , air quality, schools.</p> <p>The schools are already oversubscribed , the transport system is ineffective as it is. The trains are a shamble (now we don't even have direct trains to Victoria Station) , the trains are always overcrowded in Streatham already, I cannot imagine what it would be with all these extra new homes. The traffic on Norwood High Street is incredibly bad at all times and we have all suffered for years of closures due to all the latest gas works etc. What about sorting out all these things first? The area around Streatham station is neglected, dirty, run down; why not sorting out the traffic system, the trains/or a tube connection /building more schools/more playgrounds -there are no green spaces around Knolly Yard..</p> <p>What about the economic impact? we are already losing a lot of the small businesses which have been in the area for many years.</p> <p>We are totally OUTRAGED that there has been NO serious attempt by</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Lambeth council to inform properly the residents and it seem to us that these drafts have been rushed and not really thought through properly, taking into considerations all the things mentioned above.</p> <p>I totally reject your plans for both sites on the basis that the scale of these projects does not take into account the impact it would have on the rest of the community. The main road is already too busy and the infrastructure is already too much under pressure as it is. The projects are completely disproportionate. I am appalled at the lack of open public consultation. The neighbourhood needs change but not in this way, this would completely alter the character of this place. I am afraid to say that after living in the neighbourhood for 30 years, I would want to move if these plans would go ahead and from the comments read on social media it seems that many feel the same way</p>	
Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make.</p>	Noted.
Individual	R0052	Other	<p>I have tried hard to make comments about the proposals in the website but not successfully, I am not skilled with IT. I am keen for my views to be heard and so I am sending this email. I object strongly to the proposed plans for tall tower blocks to be built. They will not be in keeping with the rest of our high street and neighbourhood. I would like a community centre, shops, housing, workspaces and parking. We have so many interesting buildings in our old Norwood High Street. Let us create new interesting spaces in our new town centre, not soulless tower blocks. Let us have a place our families can enjoy and spend time and money in!</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0062	Other	<p>I object to the inclusion of site 18 and site 19 in the Lambeth Site Allocation Development Plans. The intensive development of these sites based in the centre of West Norwood will alter the character of our bustling community. The building of high rise developments will have an adverse effect on the townscape of West Norwood and Tulse Hill and will affect the local community much more significantly than other proposed developments in this plan. While I recognise the need for</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>more affordable housing in the area, there has been minimal consultation with locals to assess the impact.</p> <p>This is in direct contravention to the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, which describes : It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.</p> <p>I look forward to hearing from you and hope you will remove these sites from the proposed plan in order to allow for local consultation.</p>	
Individual	R0066	Other	<p>I have been reading about the proposed plans for West Norwood and as a resident of the area I am horrified!</p> <p>I would like to request the removal of Site 18 and 19 from the plan for the following reasons:</p> <ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • These are the only two sites with recommendations for tall buildings. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact • This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R0071	Other	<p>these plans should be removed they are completely out of keeping with the community view of the future of West Norwood Knowles road and lands down hill The buildings are too high to be in keeping with their surrounding</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0072	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p> <p>I am shocked to learn that your future development plans for Sites 18 and 19 in West Norwood are not to be subject to full and comprehensive consultation with the local community.</p> <p>The nature of the planned building of high tower blocks on these sites is so alien to the history and character of this area, I can't imagine what</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>the Council are thinking of. These two sites must be removed from the current exercise and considered in conjunction with local representative bodies including Norwood Forum. There are other ways of providing for more homes which can be in keeping with the character of the area. Anyone who lives in or near to West Norwood knows the unique and attractive features of the area, notably:-</p> <p>one of London's historic Metropolitan cemeteries, a thriving local theatre company housed in a listed Victorian fire station, a small nature reserve - a remainder of London's Great North Wood, Norwood and Tivoli Parks, many roads full of fine Victorian and Edwardian houses, historic pubs like The Horns which was first built in the 17th century etc. .</p> <p>Modern tower blocks of 11 or 22 storeys high anywhere in West Norwood would blight the nature and quality of the every view of the whole area.</p> <p>Please show you are a Local Authority with good judgment and respect for your residents' views.</p>	
Individual	R0076	Other	<p>The planning applications for these two sites have disregarded consultation with the local community. The plans are totally out of character with the existing architecture in the town centre. These plans should be rejected and re designed to reflect the needs and wishes of the the local community.</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>
Individual	R0080	Other	<p>I would like to register my objection to the proposed development of sites 18 and 19 as part of the Lambeth Site Allocation Development Plans. These major developments would profoundly affect the retail and residential heart of West Norwood and Tulse Hill – tower blocks that would be entirely out of keeping with the neighbourhood. I agree with the other reasons that Crispin Evans gave in his note last month on behalf of the Lancaster Avenue Residents' Association, including the point about how this would substantially increase traffic volumes and size along a residential road which is part of a conservation area.</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>
Individual	R0081	Other	<p>I am voicing a strong objection to the horrendous plans of Site 18 and 19.</p> <p>The local businesses here in West Norwood have struggled through an intense pandemic and have just come out the other side the last thing they need os a large development. The high street of independent retailers have proven resilience up til now. On top of this does not provide and provision for the existing businesses that we need as part of our local eco system such as car repair workshops and scaffolding companies.</p> <p>I can see that we need affordable housing but really not at any cost. One would expect ambitious credentials for any development in the</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			area. Why not use local people to design and local people to see it through?	
Individual	R0087	Other	<p>It was with some horror that I got a leaflet through the post with the plans for the site 18. Why did Lambeth not advertise the fact that they were consulting on such mega proposals? It looks very much to me that these plans have been kept quiet as the originators of the plans would know how unpopular they would be.</p> <p>The plans would completely destroy the character of the local area and would be out of keeping with the area.</p> <p>As far as I can see half of the high street has been taken out, with a vast reduction in the number of local shops. There is an enormous increase in the amount of housing. There clearly is not the local facilities - particularly housing, health services.</p> <p>My son lives in Lansdowne hill and such a large development would be a complete nightmare. There is already a shortage of parking and this development will make it worse.</p> <p>My son has seen the plans and is desperately worried. He has only recently moved into Lansdowne Hill, but is now considering selling his house and moving away.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0091	Other	I live 5 minutes from West Norwood and use it as my shopping centre, my son also goes to school there. This development will ruin one of the few remaining communities which remain more or less intact. It will look like Brixton, ie. A mess.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0092	Other	<p>When did this proposal get through planning? I object as it is completely out of keeping with the surroundings. There is a real community built up around Norwood Road. This massive 22 story tower block cannot just be plonked in a community. Every housing development must include schools, shops, doctor surgeries, parks etc support those that live in them. This massive high density tower block is in the centre of an already urban populated area. There is no space to build a park, schools etc to provide for all the extra families.</p> <p>I object in behalf of the people who live nearby, and those that would be put in there.</p> <p>Elephant and castle is carrying out these type of buildings, but they are also building the massive Elephant park, lots of shops and street space. This proposed development has none.</p> <p>This is a thoughtless development that does not include thinking about people's lives.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0093	Other	I am writing to object to the current proposed development of sites 18 and 19 in West Norwood. Whilst I do not object to the idea of developing additional residential properties in West Norwood, I do object to the current proposals.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>My objections are as follows:</p> <p>Both sites have plans for very high rise tower blocks. These would not be in keeping with the existing developments in West Norwood, and why should the West Norwood sites of 18 and 19 be the only sites out of the 12 proposed developments to have high rise towers.</p> <p>The local community has not been given sufficient time to review and comment on the proposals.</p> <p>The proposed changes will significantly change the look and feel of West Norwood in a negative way, spoiling the current aesthetics of our neighbourhood.</p> <p>The community wants to be involved in the development of our neighbourhood, and not simply to be subject to developers' ambitions. Where does B&Q sit within these plans. This store and it's parking is integral to the life and soul of West Norwood and would completely change the dynamic of the town if it were removed.</p> <p>As said above, I am a supporter of certain developments if done with the consultation and involvement of the local community and if done sensitively and in keeping with the existing environment. These plans do not do this, so I strongly object.</p>	
Individual	R0100	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>I write to register my objection to the proposed Site 18 and Site 19 developments in West Norwood, where I live.</p> <p>Both of the proposed developments threaten to hugely change and disrupt the area in which we have lived happily since 2012. Over the past ten years, my wife and I have had two children, and seen them grow up in West Norwood and attend one of the local primary schools in the area, Hitherfield. During our time here, we have seen West Norwood develop and grow into a far more community-focused, vibrant and independent neighbourhood with its own character and 'village' feel, despite being in the heart of our capital city. Both of these developments pose a clear and present danger to that community.</p> <p>The developments run completely counter to Lambeth's own 2017 Masterplan (A Manual for Delivery), as set out by Coun Jack Hopkins in April of that year. Mr Hopkins acknowledged in his foreword to that report that West Norwood had 'confirmed to us that this area truly has one of London's strongest communities'. The report also noted: 'It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.' However, these proposals seem to completely ignore the above. Indeed, they threaten the construction of huge, high-rise units in the heart of an entirely low-rise residential area. They will profoundly re-shape our blossoming High Street, looming over the area and dominating the skyline in a fashion entirely out of keeping with our community and existing architecture. The designs and proposals are deeply unambitious, with one tower block proposed at 22 storeys. As far as my family can see, there has been little or no attempt to engage the local community in these proposals. Sites 18 and 19 are major developments and no other area of Lambeth will be affected in the same way as these development plans. Out of the 14 sites mentioned in your development plans, these are the only two with recommendations for tall buildings. Surely after the Grenfell Tower disaster, Lambeth - a council keen to burnish its environmental and progressive credentials - would want to move away from high rise developments and look towards something altogether more suitable and in keeping with the 21st century?</p> <p>I would urge the council to reconsider both Sites' 18 and 19 inclusion in the process and ask you to remove them from consideration. Paving the way for such developments would destroy our local area and earn Lambeth the same kind of planning reputation that the likes of Birmingham City Council and Newcastle City Council both held, for prizing monstrous development over the local community. There is a real opportunity for careful, considered and ambitious development of this small suburb of London. I would urge you not to miss it.</p>	
Individual	R0110	Other	<p>I am a resident of [address redacted] West Norwood. I would like to strongly object to your plans to develop site 18 and 19. Site 18 and 19 will dramatically change the appearance of West Norwood High Street. It will destroy the strong sense of community at the heart of West Norwood. I do not believe that the community in West Norwood have been sufficiently engaged with this consultation and fully understand the changes these developments will bring. West Norwood has a diverse and vibrant local community, one of the last of these arguably in Lambeth. We have an engaged community which is borne out in the wealth and diversity of local business. It is celebrated every month at the volunteer led Feast. Whilst West Norwood welcomes investment, this must happen in stages along with</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>local people and businesses.</p> <p>Croydon Town Centre provides a model of what a community town centre should not look like - anonymous, utilitarian and devoid of a sense of community and life. High rise development taking up valuable green space has already begun blighting West Norwood on Knight's Hill. Site 18 and 19 will bring this to the very heart of West Norwood. Independent retailers will be driven out.</p> <p>I have lived in Lambeth for nearly 30 years and I have always maintained West Norwood is one of the last strong communities left. Please don't destroy it. Please talk to local residents and businesses and help us shape our future,</p>	
Individual	R0117	Other	<p>I wish to object to the inclusion of Sites 18 and 19 in the Lambeth Site Allocation Development Plans due to the major developments that will impact on both the retail and residential heart of West Norwood and Tulse Hill. The proposals include plans for high tower blocks which are totally unsuitable to the area - and these tower blocks are not proposed for any of the other sites in the Development Plan. Also there was minimal consultation with community groups in the area - a major development like the ones proposed for sites 18 and 19 need to be properly discussed and worked through in a collaborative manner with the local community.</p> <p>These two sites need to be removed from the SAPDP. I would like to object to the inclusion of sites 18 and 19 in the Lambeth Site Allocation Development Plans and have the following comment.</p> <p>I fully appreciate the desperate need for new, mixed accommodation for local people at affordable rents – but not at any cost. We should have local homes for local people which are designed in collaboration with local people. There has only been minimal consultation with local community groups on these proposals. I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0120	Other	<p>I am writing to express my concern and puzzlement about the proposed development in West Norwood. Whose idea is this? Sites 18 and 19 in particular looks as though they will completely change character of the place and there has been hardly any consultation. Where are the public meetings and explanations and dialogue. It cannot go ahead.</p> <p>We want affordable housing but there is no sign that this development would provide this. And in any case social housing must be well designed and thought through. There is no indication that this has happened. In terms of retaining and improving the the current character of West Norwood, there is no indication that this has been done. It is</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			vandalism, pure and simple. Also, I don't understand how you can be putting forward a plan which local councillors are not in favour of and would welcome and explanation for this. What is the point of democracy if unelected officials can ride roughshod over elected representatives and local residents? It's a disgrace.	
Individual	R0121	Other	<p>I am against the site 18 and 19 development plans for the following reasons:</p> <ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • These are the only two sites with recommendations for tall buildings. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact • This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes: It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. <p>I live on Knollys road and my autistic son already struggles with noise and traffic on this road, let alone a huge complex on our doorstep.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0122	Other	<p>I write as a resident of West Norwood, residing on Ullswater Road, very close to the proposed site 18.</p> <p>I am very concerned and upset to hear about the proposal for site 18. Since moving to the area 2 years ago I have consistently made use of the shops on the site, namely Greggs, Iceland and B&Q. Whenever I have visited these establishments, they always seem busy and well utilised. I do not understand why you would want to remove thriving businesses from our high street.</p> <p>I am not someone who usually campaigns or is involved in community consultations, but I strongly feel that tearing these buildings down and</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>replacing them with non retail buildings is a mistake. I feel that West Norwood has been building itself up to be a nice town centre, with shops, cafes and the new cinema at the library. It seems completely nonsensical to convert two whole blocks of prime high street in this way, and to deprive the community of its amenities.</p> <p>Here are a few ways we have made use of the shops on site 18:</p> <p>-My partner works in a busy London hospital, and has to travel early and at random times to and from work. He greatly appreciates having a Greggs nearby which is open in the early morning and throughout the day.</p> <p>-When it was Christmas 2020 and 2021 we had to stay at home and could not go to our families due to the pandemic, we bought our Christmas day meal supplies from Iceland. At some points, especially in 2020, it was impossible for us to get an online delivery from any supermarket, and having this store nearby meant that we still had access to food and essentials.</p> <p>-When we bought our first home in West Norwood a few months ago, we were in B&Q regularly buying supplies to paint and decorate. We don't have a car and so it was really helpful to be able to walk there and back with our supplies.</p> <p>Of course this is only the example of one household, but I am certain many households in the area have a similar story. Many people who rely on these shops on a daily basis. I have seen people queuing outside each of these stores at some point in the last 12 months. These are not empty stores, they are useful, popular, and their absence would be felt.</p> <p>I feel that removing these shops would mean that the area is a less attractive place to live, and could reduce the value of properties in the area, which would be ironic given the intention to build housing on the site. Therefore, this proposal would be bad for the community, the investors of this project, and the people who would live in such housing. I find it very hard to believe there are not other suitable areas which would not be detrimental to our high street.</p> <p>For the reasons mentioned above, I would ask that you remove site 18 from the proposals.</p>	
Individual	R0127	Other	<p>I am very concerned about the proposed plans for the heart of West Norwood. Please remove Site 18 & 19 from these plans – the incongruous nature of these sweeping schemes are totally unsuitable for this location. In addition I am very concerned at the lack of resident community consultation and therefore the long term impact on the neighbourhood in which I live. They completely destroy the local community environment and are pretty devastating in their scale. The</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>tall buildings are overwhelming, aesthetically unattractive and out of context to the local environment (e.g. residents, the range of independent retailers) and interesting history of this area. There are no high buildings in this locality and they will be a disfigurement to our environment.</p> <p>I would also point out the Building Safety Crisis https://buildingsafetycrisis.org/ has not been resolved and the implication is that the failure of Developers and manufactures of building products are culpable for the devastating loss of life at Grenfell https://www.grenfelltowerinquiry.org.uk/ . The Government has not initiated a route out of this crisis, nor have they resolved the problems with current Regulations. This problem extends and makes it quite clear from those past events that Developers and their business and construction partners are not altruistic in nature and, as with many other plans in the past, the unconvincing financial viability of Site 19 risks the Developers altering the ratio for the affordable housing allocation. I ask for these proposals to be reconsidered with Community Hub involvement (Residents and Businesses).</p> <p>No other Lambeth town centre is to be affected in the same way by these development plans, so any the consultation process must reflect this. Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood. It is clear that there has not been sufficient time to effectively engage the community in understanding the proposals and their long term impact on us and future generations. This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation.</p>	
Individual	R0132	Other	<p>Please remove sites 18 and 19 affecting West norwood from the plan. There has been almost no public consultation on these major and radical plans, more time is needed for public to understand and examine these plans. Also the high rise nature of the plans will profoundly and badly affect people's environment and lives. It is not right or fair for such radical plans to go unchallenged by those for whom the changes will affect most.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0133	Other	<p>I write to register a strong objection to the proposed development plans for Sites 18 and 19. Such development will adversely impact on the retail and residential heart of Tulse Hill and West Norwood. Proper consultation with the local community is required to seek ways forward. This has not so far been allowed. Please refocus.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0138	Other	<p>I wish to object strongly to the proposed developments at Sites 18 and 19. These would be major developments, profoundly damaging to the</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>character of the retail and residential heart of West Norwood and Tulse Hill. The present character of this area has developed organically over many years; future developments should respect this fact and not disfigure the area with multi-storey buildings that are completely out of keeping with it. There is nothing in the present proposals that respects or puts sufficient value on the sense of place that already exists.</p> <p><u>I hope you will reject these proposals.</u></p>	
Individual	R0139	Other	<p>I am writing to demand the removal of Site 18 and Site 19 from the consultation on Lambeth Site Allocation Development Plans - Draft (SADPD) for the following reason. These are the only two sites with recommendations for tall buildings. Unlike the other 12 sites, Site 18 and 19 are significant developments that will profoundly impact the retail and residential core of West Norwood and Tulse Hill Together these are one of the five town centres recognised by Lambeth.</p> <ul style="list-style-type: none"> • The Site 18 and Site 19 current plans as proposed would bring about substantial negative change to our neighbourhood and our way of life, right to the heart of our community • Instead of these tall towers representing nothing more than 'developer architecture', I would prefer to see ambitious incremental development with the community as an equal partner in an exemplary approach to town centre redesign. • I believe that such incremental development (within an outline Master Plan) is the only way forward as it enables the development to reflect change in the way we live our lives. <p>These are the only two sites in the whole plan with recommendations for tall buildings. At the same time current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes:</p> <p>It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.</p> <p>In this context, there has been insufficient time to adequately engage the community in understanding the proposals and their long term impact, especially the height of the buildings.</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0140	Other	<p>As a resident of west Norwood, I am writing to object to the proposed developments of site 18 and 19.</p> <p>I believe these high rise buildings will profoundly impact the residential heart of west Norwood. Such tall buildings will be an eye sore and will bring many more cars to an already congested area.</p> <p>This development will bring a substantial changes to our neighbourhood.</p> <p>I think low rise affordable homes for local people is the way forward.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0145	Other	<p>I am long time resident of West Norwood and wish to register my objections to the planning proposals for site 18.</p> <p>There is nothing positive about these proposals which are out of context with the community.</p> <p>The impact on air quality through increased traffic to service the proposed new homes is massive, let alone having to build a flyover to accommodate this traffic. The flyover will destroy the local community and create problems at York Hill where I live.</p> <p>Tall buildings will destroy a beautiful skyline and give nothing back in recompense. Social housing may be needed, however it should merge into the community not eradicate it.</p> <p>I could write a book about the negative impact of these plans, suffice to say they are all wrong, wrong, wrong.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0147	Other	<p>I am a long time resident of the Tulse Hill and now the West Norwood area.</p> <p>This development would be extremely damaging to the area and utterly inappropriate. Whilst increased housing is needed, to do so via such enormous and high rise blocks would ruin the spirit and amenity of the area. It would rob Norwood Road of light and any sense of community. It would also rob small businesses of valuable and increasingly scarce workshops. The only thing it would increase is traffic and noise - and the developer's profits, of course.</p> <p>I strongly object to these proposals and demand the removal of sites 18 and 19 from the consultation.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0151	Other	<p>I'm a resident of the borough of Lambeth, and I'm emailing to express my deepest concerns about the proposed developments site 18 and 19 in West Norwood, where I live.</p> <p>I'm very concerned that these sites will bring about undesirable and substantial change to the neighbourhood and to the heart of our community.</p> <p>I believe that incremental development is the only way forward as it enables the development to reflect change in the way we live our lives in the local area. What would be a much preferred approach is one that recognises and acknowledges West Norwood as an existing viable,</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>successful, neighbourhood, and embraces and supports our strong sense of community. An investment that sees the community as an equitable partner.</p> <p>Our 'high street' of independent retailers, with low vacancy rates, has proven resilience backed up by statistics.</p> <p>Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development.</p> <p>We recognise the desperate need for new, mixed accommodation for local people at affordable rents – but not at any cost. We want to see local homes for local people – designed in collaboration with local people.</p> <p>We must, of course, always push forward for change, but not if it is to the detriment of of local community.</p>	
Individual	R0152	Other	<p>This proposal to raze the frontage of West Norwood road between YorkHill and Lansdowne Hill and replace with high rise tower blocks is just unacceptable. It would change the character of this local shopping area: Added population would create more demand for local services, already stretched. Block the skyline, create air and noise pollution... such a development would effect the through traffic, Norwood Road is narrow, and buses already get held up along that stretch of road. There is no parallel road onto which traffic could be shunted, years of chaos would ensue, having an adverse effect on all who live and work in the neighbourhood.</p> <p>The very short consultation time allowed for proposals of this size and complexity is preposterous and unacceptable.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0153	Other	<p>Lambeth is trying to change the whole centre of West Norwood. We have lived in Lambeth for 61 years and in Tulsehll and west norwood, and had a certain Character about it. This will be totally destructive to this area. Young families have moved here thinking they have a forever homes. The local schools and structures cannot cope with this amount of people swamping the area.</p> <p>Traffic on West Norwood High Rd comes to a standstill in the rush hour now.</p> <p>NOPARKING NOW. STOP THIS HAPPENING. HOLD A MEETING AND SEE HOW PEOPLE FEEL ABOUT IT IF YOU DARE.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0156	Other	<p>I am writing to express my dismay and anger at the following proposed developments:</p> <p>'Site 18' - which is the area between Lansdowne Hill and York Hill and is proposed to include an approx. 11 storey tower block, and 'Site 19', the triangle of industrial land off Knollys Road between the railway lines where three tower blocks are proposed - the highest approx. 22 storeys.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>West Norwood is a thriving community which has been through many ups and downs but which is held together by a passionate community who care very deeply about our environs.</p> <p>There is a lot of architectural beauty in West Norwood which is really appreciated. Low rise developments in particular allow residents to appreciate the skyline and any new developments should be sensitive to this interesting mix of period properties.</p> <p>Additionally there are a number of independent businesses whose success is finely balanced between rents and customers these new developments put that balance at risk.</p> <p>B & Q is an important hub for the high street it also provides much needed car parking: which in turn allows the community to support the independent businesses that they cherish.</p> <p>West Norwood is a very special place full of people who are actively engaged in the area and the community. Whilst there is a need for additional housing any developments should be incremental allowing for the community, the businesses and the environs to adapt over time without losing its character - which is so highly prized by West Norwood residents and so important for their ongoing wellbeing and continued engagement with the neighbourhood.</p> <p>I strongly urge you to desist from this unsuitable plan.</p>	
Individual	R0158	Other	<p>I just wanted to share my views on sites 18 and 19 in Tulse Hill and West Norwood. I am extremely supportive of both proposals - especially building high density in both areas. The areas are both fairly near central London and should have much greater density/taller buildings to reflect this. I live very near to West Norwood and would love to see the redevelopment there to make it feel more of a real town centre. My only comment is that any developments like these need to be accompanied by improvements to public transport (e.g. more frequent services from local train stations/more frequent buses with dedicated lanes) and they should not come with any additional parking/new residents should not be able to get parking permits from Lambeth. Ideally they would also be accompanied by improvements to local cycling infrastructure.</p> <p>Please build more homes with taller buildings to tackle the housing crisis</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0161	Other	<p>I'm afraid that I would like to register an objection to your current neighbourhood plan proposals. I've watched WEst Norwood grow as a community during the lockdown, with so many people committed to shopping local, supporting local businesses. WE now order our food directly from local suppliers 7 we know many of our local shopkeepers. We particularly value & love traders such as wearabouts, the halal butcher's, Mr Francatelli, Sweet Carolina and many others. We also</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SAPDP Section	Comment	Officer Response
			<p>really benefit from having a B&Q in our neighbourhood. it's ver important to us that the high street is protected from homogenisation & the current atmosphere is maintained, even built upon.</p> <p>We know the area pretty well, and note that there is a proposal for a tall residential tower, to which I also object. THe majority of affordable housing in the area is in 4/5 storey blocks. Even the landmark Ujima development next to Tulse Hill is relatively low rise. It would therefore not be at all in keeping to introduce a big tower in the middle of York hill. This would ruin views along Lancaster Avenue & down York Hill, overshadowing nearby housing & breaking down the existing sense of community between close neighbours.</p> <p>I would be grateful if you could re think these proposals. This is a community that embraces greening & community initiatives. You need to build on this, not cut through it.</p>	
Individual	R0162	Other	<p>I am against plot 18 I think the pulling down of plenty of good buildings with business and homes, and will take away the unique character of west Norwood high street. I would like to see just the brown field sites developed like the old laundry and car wash areas</p> <p>I hope you take my comments into account</p>	Please refer to the general response to representations made by individuals and businesses.
Natural England	R0163	General	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	Noted.
Individual	R0164	Other	<p>I would like to register my concern about the proposed Lambeth SAPDP sites 18 and 19.</p> <p>Reason to remove</p> <ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • These are the only two sites with recommendations for tall buildings. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact • This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity 	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes:</p> <p>It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.</p>	
Individual	R0164	Other	<p>Suggestions</p> <ul style="list-style-type: none"> • We don't want to see a swath of 'developer architecture', but an ambitious incremental development with the community as an equal partner in an exemplary approach to town centre redesign. • We believe that incremental development (within an outline Master Plan) is the only way forward as it enables the development to reflect change in the way we live our lives. • Nothing in these proposals reflects the changes that Covid-19 has brought to every aspect of our lives. • We expect world class urban design that recognises West Norwood as an existing viable, successful, neighbourhood with an enviable strong sense of community. • We welcome investment that sees the community as a partner. • Our 'high street' of independent retailers, with low vacancy rates, has proven resilience backed up by statistics. • Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development. • We recognise the desperate need for new, mixed accommodation for local people at affordable rents – but not at any cost. We want to see local homes for local people – designed in collaboration with local people. • We expect ambitious environmental credentials for any development. • We have a strong identity that blends independent business with residential accommodation in heart of our community. We have reached this enviable position organically and nothing in these development proposals puts sufficient value on the sense of place that already exists. • These proposals do not provide adequate provision for our existing 'dirty' businesses - e.g. scaffolding companies and car repair workshops. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood. 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<ul style="list-style-type: none"> • B&Q is an anchor store in West Norwood, another reason we can call ourselves a 15min Neighbourhood, we can see no specific proposals to retain this important business along with its essential parking - that is also an important asset for the rest of the shopping area. 	
Individual	R0165	Other	The West Norwood Town Center would hugely benefit from a considered approach to densification and further development of homes and businesses, and there are many merits to Site 18 (West Norwood town centre) where the density can be managed in terms of massing and the need for better public space provision in the town centre with links to the local neighbourhoods.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0167	Other	<p>I am a Lambeth resident I live on Norwood Road and I would like Site 18 and 19 removed from consultation and a community wide consultation on the building of any new housing developments organised. I object to the proposals of these two sites. We need housing for local people. Social housing and affordable housing - real affordable housing.</p> <p>These plans will affect local businesses who will be forced to close. These are much needed local small businesses and bars and garage all part of the local community.</p> <p>These developments will be bringing even more traffic to an already congested area. Both in terms of large vehicles during the building of the development Where will all of these new residents park? The knock on effects is even more traffic bringing pollution and congestion to an already congested road.</p> <p>Any consultation on a development should be addressed as a community wide consultation. Asking local people what is needed. We want a full consultation on the development working in partnership with the local community, both residents and businesses and this should include businesses and residents in the whole area and working towards a working solution to benefit all. We want to see great design that makes West Norwood an enviable place to live for the community and newcomers. The businesses should also have their say. These are independent retailers and business who are part of the community. The local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development. Of course new, mixed accommodation for local people at affordable rents are what are ultimately needed but what is the point of bringing new residents into the area if there are not facilities, pubs, shops etc. We want to see local homes for local people – designed in collaboration with local people We expect ambitious environmental credentials for any development.</p> <p>These proposals do not provide adequate provision for our existing</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			'dirty' businesses - e.g. scaffolding companies and car repair workshops. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood. B&Q is an anchor store in West Norwood, another reason we can call ourselves a 15min Neighbourhood, we can see no specific proposals to retain this important business along with its essential parking - that is also an important asset for the rest of the shopping area. We look forward to the in depth public consultation that allows local people to get involved and be part of their own destiny.	
Individual	R0169	Other	This vast development in West Norwood is a massive problem: <ul style="list-style-type: none"> • No adequate public consultation • Destroys the character of the local area • Threatens local home and businesses • Nothing about Lambeth's Net - Zero target for 2030 • No vision for town centre fit for 2050 and beyond My neighbours and I object and we demand that the proposals for site 18 & 19 are removed from consultation and new plans should be developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0172	Other	This vast development in West Norwood is a massive problem: <ul style="list-style-type: none"> • No adequate public consultation • Destroys the character of the local area • Threatens local home and businesses • Nothing about Lambeth's Net - Zero target for 2030 • No vision for town centre fit for 2050 and beyond My neighbours and I object and we demand that the proposals for site 18 & 19 are removed from consultation and new plans should be developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0174	Other	I demand the removal of site 18 and 19 from this consultation as per the reason below: <ul style="list-style-type: none"> • Building high rise flats is a disservice to the area. We moved back to the area in June because of how much we liked the independent businesses and community feel of the area. We are a close knit community, welcoming of all and impersonal developer owned properties (which they will end up being) will completely shatter this. This just opens the doors to Starbucks and other large cooperations to move in- which is not why we love our town. These proposals feel like you're only looking at short term gain and not about the legacy you will be leaving in an area. • We are not commenting on detailed planning applications so issues of construction traffic, business disruption compensation, etc, whilst relevant in the longer term, are not quite so important now. • We don't want to see a swath of 'developer architecture', but an 	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>ambitious incremental development with the community as an equal partner in an exemplary approach to town centre redesign.</p> <ul style="list-style-type: none"> • We believe that incremental development (within an outline Master Plan) is the only way forward as it enables the development to reflect change in the way we live our lives. • Nothing in these proposals reflects the changes that Covid-19 has brought to every aspect of our lives. • We expect world class urban design that recognises West Norwood as an existing viable, successful, neighbourhood with an enviable strong sense of community. • We welcome investment that sees the community as a partner. • Our 'high street' of independent retailers, with low vacancy rates, has proven resilience backed up by statistics. • Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development. • We recognise the desperate need for new, mixed accommodation for local people at affordable rents – but not at any cost. We want to see local homes for local people – designed in collaboration with local people. • We expect ambitious environmental credentials for any development. • We have a strong identity that blends independent business with residential accommodation in heart of our community. We have reached this enviable position organically and nothing in these development proposals puts sufficient value on the sense of place that already exists. • These proposals do not provide adequate provision for our existing 'dirty' businesses - e.g. scaffolding companies and car repair workshops. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood. • B&Q is an anchor store in West Norwood, another reason we can call ourselves a 15min Neighbourhood, we can see no specific proposals to retain this important business along with its essential parking - that is also an important asset for the rest of the shopping area. 	
Individual	R0177	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>I would like to comment on the proposed site 18 & 19 in West Norwood. I am concerned that the architecture is 'developer architecture' and has been designed without the community as an equal partner. The designs will bring a huge change to the neighbourhood, which has a strong community and sense of identity, which is not currently reflected in the designs or proposals.</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0178	Other	As residents local to Sites 18 and 19 in the SADPD Plans we would like to add our voices to those objecting to the proposals. We agree with detailed objections set out by others but specifically feel the development heights proposed are bizarrely out of scale and inappropriate. We would also stress what we anticipate will be severe negative affects on local traffic, infrastructure provision and destruction of the low rise, outer suburban neighbourhood atmosphere of West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0184	Other	I demand the proposals for Site 19 and Site 18 are removed from this consultation and new plans developed with the local community input. These plans will only cause further congestion and pollution to an already highly populated area and destruction of community spirit. It will destroy the character of the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0185	Other	these huge proposed developments demand a full and extensive consultation with the affected local communities. Please don't turn West Norwood into Lewisham! Are you looking to fulfil a Thatcherite vision of a "property owning democracy" with no provision for those who cannot afford ownership? (I am not in this category). I say this as a life-long Labour voter (also member) who, currently, sees no reason not to vote Green henceforth (starting this May).	Please refer to the general response to representations made by individuals and businesses.
Individual	R0186	Other	I am writing to express my deep concern over these plans. I have been living in West Norwood for 50 years and have seen the area develop into a thriving multi-cultural community with a safe, friendly high street containing all the shops, eating places, entertainment and sports facilities I need without having to leave the area. I am glad that a lot of the shops and cafes are small businesses and that we do not have too many big, impersonal brands like Costa Coffee which I am pleased to see has closed down. The fairly recent development of the Feast has made a big contribution. I am dismayed that plans for such a vast development have been made, that there is such a short period available for consultation and that the consultation has not be adequately advertised. I was informed about the consultation by the Norwood Forum – why hasn't the Council put leaflets through our doors, posters in the library etc, to make sure that people know what is happening? This development will destroy the local character of the area and threaten lots of little businesses which have done so well to survive the lockdown. I wonder too, what the impact of such a development will be on the environment and how it will contribute to Lambeth's Net-Zero target for 2030. Lambeth has severely cut its services to youth and under-fives and its	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>support for people needing care is very poor. We are told that this is due to lack of funding and cuts from central government. Why can't the Council use some of the funds it plans to pour into this kind of development (funds such as the ones which were used to totally and unnecessarily re-pave Chestnut Road) and spend them on people with support needs and children and young people.</p> <p>This is my contribution to the consultation. Please let me know if there are any other ways in which I can let my views be known and as you have not done so so far.</p>	
Individual	R0190	Other	<p>We are residents of West Norwood and demand that proposals for Sites 18 and 19 are removed from this consultation and new plans developed with the local community.</p> <p>We are appalled that so little regard is being shown for the views of what has been an increasingly active and interested community over recent years, with the aim of improving this area. We are writing to express our objections to the proposals for the development of these sites in West Norwood. As with the recently proposed waste site, Lambeth's "vision" for West Norwood seems to include only what is going to make an area in need of serious improvement less attractive, more congested and polluted, and more stressed terms of traffic, parking, and the viability of local services and businesses. Local people have tried hard in recent years to make this area a better place to live - we would be interested to know which local councillors think that this is a good way forward for us - the impression is that West Norwood is only seen as a dumping ground for unattractive developments that no one else wants.</p> <p>We were surprised to hear that this proposal is to be decided so soon - it has obviously not been adequately consulted on and we would like the proposals for these two sites to be removed from this consultation and reconsidered with input from a local community which has shown itself to be concerned and interested in improving the local area, not destroying what character and amenities it has been allowed to retain this far.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0192	Other	<p>I am a local resident in Norwood and I am writing to lodge my objection to the ill conceived gargantuan redevelopment planned on site 18 & 19.</p> <p>The tall block in particular is egregious given the scale of it, and also the plan to tear down the Victorian high street buildings in favour of this awful new development. This will ruin the high street. Please take the local objections into consideration with planning.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0195	Other	<p>I have known through the Norwood Forum of your plan of constructing Site 18 in West Norwood, and would like to express my disagreement to</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>it and join my voice to many other residents that oppose to the project. I understand the need for affordable housing in London, but doing that at the expense of the character and sense of community of the area does not seem the best way to approach the problem. West Norwood is a nice place to live because houses are made to human scale, not much higher than the beautiful trees on the side of the road.</p> <p>Please, let's not make the same mistake over and over, and destroy what is left of a quality lifestyle in the heart of the city. Let's not store people in compartment blocks like in a cabinet...let's create a better space, stylish, respectful of the surrounding homes, kinder to people.</p>	
Friends Group for Hillside Gardens Park	R0197	Other	<p>I am writing on behalf of the Friends Group for Hillside Gardens Park. Having seen Lambeth's Development Final Plan for site 18 and site 19, we have reservations about the plans being developed for Knolly's Yard and for a significant part of West Norwood on the following basis:</p> <p>1. That you have not followed guidance for neighbourhood planning.</p> <p>We are for development of affordable and sustainable housing but want the local community to be involved in development of plans.</p> <p>Consultation has been woefully inadequate.</p>	<p>Neighbourhood forums are encouraged to develop neighbourhood plans. The designation of the Norwood Planning Assembly Neighbourhood Forum was approved by the Cabinet of the Council in July 2017. However, these designations expire after five years, meaning that the designation of the Norwood Planning Assembly Neighbourhood Forum has expired before the forum has been able to produce a neighbourhood plan for the area.</p> <p>The purpose of the SADPD is to set a vision for Site 18 which outlines the basic parameters that should guide any future development of the site. Such parameters include land uses and their quantum as well as indicative heights of buildings. The SADPD is not a development proposal for the site. Development proposals on any of the parcels within the site will be put forward by applicants in due course and follow the standard planning application process.</p> <p>Previous pieces of work and other consultation work in West Norwood, have provided an extensive and valuable insight on local community aspirations and priorities, such as a desire to support the growth of the town centre and local businesses, to provide new mixed tenure housing, to improve public realm, pedestrian and cyclist permeability and public transport accessibility. This intelligence has informed the content of the SADPD for Site 18.</p> <p>Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.</p> <p>After the end of the consultation period, the council organised three targeted stakeholder engagement workshops with representatives of the community stakeholder groups that had submitted responses to the Regulation 18 consultation on draft sites 18 and 19 in West Norwood/Tulse</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				Hill. These were held over a six-week period in October and November 2022. These workshops provided an opportunity for Council officers and members to explore further the points raised in the Regulation 18 representations with local representatives. These workshops have helped inform the Council's consideration of the Regulation 18 consultation responses received and the resulting content of the Proposed Submission Version SADPD for Site 18.
Friends Group for Hillside Gardens Park	R0197	Other	2. That these plans will change the character of the neighbourhood and set a precedent for this area.	The approach to the site has been revisited following the Regulation 18 consultation and new massing scenarios have been tested. The townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.
Friends Group for Hillside Gardens Park	R0197	Other	3. That the development plan and the number of new households will put the local infrastructure under serious strain, including water, health and leisure facilities such as the parks, playgrounds and sports courts without proper provision for new and additional facilities.	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the evidence for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> - necessary to make the development acceptable in planning terms; - directly related to the development; and - fairly and reasonably related in scale and kind to the development. <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 residential units. This would assess the impact of the proposal on existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.</p> <p>London Plan SI 5 and Local Plan Policy EN6 specifically address the impacts of development on water/wastewater infrastructure. They seek to ensure that local water supply and public sewerage networks have adequate capacity both on and off-site to serve a proposed development for its lifetime or can be upgraded, where required. Where a capacity constraint is identified, Policy EN6 sets out that a development must be phased to ensure that any necessary infrastructure upgrades are delivered ahead of occupation.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Friends Group for Hillside Gardens Park	R0197	Other	4. That the plan will result in changing the nature of West Norwood which has managed to retain a large proportion of independent retailers, cafes and suppliers.	It is not expected the site will be developed at once. Instead, the most likely scenario is that where separate planning applications affecting each of the existing parcels within the site are submitted independently by separate applicants at different times. It is therefore expected that the site will be developed gradually allowing existing businesses to adapt. Plans for the re-provision of existing business or their relocation on site will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local opportunities for any business likely to be directly affected.
Friends Group for Hillside Gardens Park	R0197	Other	5. That there is no reference to sustainability or net zero and that there is contradiction in the documents about the level of additional traffic being added to already congested roads.	Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making. There is considerable existing Development Plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy. Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected impacts on the local road and public transport networks. In line with London Plan policy T6 the development would be car-free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street if a Controlled Parking Zone (CPZ) were introduced. The number of vehicular trips generated by development on site would therefore be limited, helping to minimise impacts on parking, congestion and air quality.
Friends Group for Hillside Gardens Park	R0197	Other	We are in favour of development but believe it should be considered and in partnership with the local community.	Noted.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0198	Other	<p>I strongly oppose to the proposed development of site 18 & 19 in West Norwood for the following reasons:</p> <ul style="list-style-type: none"> • There has been no adequate public consultation. • The site is not viable for affordable housing. • Reduced air quality. • Where's the information regarding Lambeth's Net-Zero target for 2037? • No vision for a town centre fit for 2050 and beyond. • Local businesses will be affected including some independent businesses who have against all odds, survived the pandemic and are valuable to residents and non-residents. • Local jobs will be lost. • Many residents enjoy the skyline, views and light which will be obscured by the proposed development of the mega blocks. • They will destroy the character of the local area. • Traffic will become chaotic not only during the build, but once completed with less available parking. • Loss of trees and therefore wildlife at a time when we should be doing everything in our power to conserve nature. <p>I demand that the proposals for sites 18 & 19 are removed from the consultation and new plans developed WITH the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0199	Other	<p>I would like to object to the plans for site 18 and site 19 in West Norwood. There has been no public consultation and it goes against Lambeth's plans for the area. It will destroy the character of the area and cause local businesses to close. These plans need to be removed and new plans for the area developed with consultation with the community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0200	Other	<p>As local residents and the impact this development will have on traffic, congestion, loss of local jobs and amenities, pollution and having a huge impact on the existing community. We strongly urge that proposals are removed from this consultation and NEW plans are developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0201	Other	<p>I'm writing to ask that site 18/19 are removed from consultation due to the fact that insufficient consultation has occurred with the community. Only a 1 hour meeting and as a member of the general public I have only just been made aware of these developments.</p> <p>As a resident in this area for 35 years, I would like more consultation on the proposals about how it will affect the neighbourhood. I'm deeply concerned about the proposed housing developments at site 18-19 in Norwood.</p> <p>It appears to significantly impact the high street which I feel as improved greatly in recent years with a good blend of independent and chain retailers. I would be concerned about the impacts these businesses would feel and the changes that would be made to the high street both</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>in terms of the architecture and community feel. Inevitably large blocks of flats will change the architectural style of the neighbourhood and I would worry about its juxtaposition with the Victorian housing.</p> <p>I'm not against the creation of affordable housing but I'm not sure that it's necessary to build tower blocks here. Adding over 400 properties to the area would have further impacts on infrastructure and transport, which unless we are properly consulted -how do we know what considerations have been made.</p>	
Individual	R0202	Other	<p>Site 18 should also be put out to tender. A development of such magnitude should not be rushed through by a planning team who clearly have no idea about what the community either wants or needs and who have zero understanding of aesthetics.</p> <p>Neither of these site proposals take into consideration previous community consultations. This is an obscene waste of money.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0203	Other	i have not been consulted about this huge plan	Please refer to the general response to representations made by individuals and businesses.
Individual	R0206	Other	<p>I am writing to express my heartfelt view that Sites 18 and 19 be removed from the Lambeth Plan.</p> <p>In your very own 2017 Master Plan you stated :</p> <p>It is vital that principles of collective action, collaboration and partnerships are at the heart of efforts to towards agreed objectives and aspirations for the area. The strength and willingness to engage with the West Norwood and Tulse Hill community has been instrumental delivering numerous successes for the area in recent years. The area is home to a high number of organisations which have the capacity and experience to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.</p> <p>Your current imposition without any time for meaningful consultation is in direct contradiction to what I thought were the ideals and principles of Lambeth as a Co-operative Council with a green agenda. I cannot understand why you have not worked alongside the Norwood Planning Assembly and their initial ideas and plans for a human scale, greener and more aesthetically pleasing design for the centre of West Norwood.</p> <p>Other arguments for the removal of sites 18 and 19 have been well documented and commented on by a huge number of local organisations and residents. These relate to:</p> <ul style="list-style-type: none"> • Huge impact on retail and residential heart of West Norwood • Difference between the scale of these sites in relation to other areas in the plan • Tall buildings that are totally out of character with the area. • Lack of time for serious public consultation 	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<ul style="list-style-type: none"> • Reduction in air quality without consideration for your own net Zero targets • Site 19 not viable for much needed Social Housing in the area • Huge increase and pressure on services already stretched: schools, doctor's surgeries, nurseries etc • Breaking you own planning rules about height of buildings in the south of the South Circular <p>I could go on, but I am sure you are aware of all the reasons that the residents of West Norwood are so angry. It feels developer rather than local resident driven, and imposed on residents in a non collaborative way.</p> <p>There is of course, a positive way forward which is what we would all like.</p> <ul style="list-style-type: none"> • We would like to see Lambeth holding to its 2017 vision of working together with the community and in particular with the Norwood Planning Assembly. • We know that Covid 19 has changed the way people live and work and want a town centre that reflects a human scale for both • We want an increase of much needed good quality mixed social and affordable housing that reflects the needs and diversity of the neighbourhood • We want new local homes and spaces designed in collaboration with local people. • We do not want to lose our independent retailers and larger stores such as B and Q • We want the possibility for start up companies and small enterprises to thrive • We need to keep some of the small industrial grade/workshop units <p>We want all these of the above, and to use good, green and aesthetically pleasing design that allows residents to feel part of a community and not isolated by architecture that does not facilitate community cohesion and spirit</p> <p>To sum up:</p> <ol style="list-style-type: none"> 1) Please remove sites 19 and 19 from the Lambeth Plan. They are not wanted. 2) Please work with the local community to achieve our mutual objective to improve the town centre of West Norwood and to provide well designed, green, good quality homes, businesses and spaces on a human scale and fit for purpose for decades to come. We are willing and able to be involved. 	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0207	Other	<p>As a West Norwood resident, I am emailing to express my astonishment and dismay at the proposals for Site 18 and Site 19 coming from a small group of councillors in the relevant local government 'cabinet'. This is an undemocratic move, totally at odds with the Lambeth plans which have been produced in collaboration with the local community and businesses over the years. The Lambeth plan of 2021 made no mention of this plan, yet within months we are being given these appalling plans with minimal time to object. If any plan for these sites progress without full community input - and the input of all councillors - rest assured that I will never vote for a Labour councillor again, which is very sad given the very positive impact they have made over the decades. Please note my objection and outrage.</p> <p>I want to give my reasons for objecting to the recently revealed plans for sites 18 and 19 in West Norwood.</p> <p>Lambeth plans have been produced over the years with input from the local community and businesses and even in 2021 there was no suggestion in the 5 year plan that these sites would be for high rise developments.</p> <ul style="list-style-type: none"> • This would be a monster - and monstrous - development of high rise buildings. In 2013 it was agreed to limit developments to 4 stories except in 'exceptional circumstances' • there are exceptional circumstances following Covid - but not ones that indicates that high rise accommodation is the answer. • More outside space is needed for families. High rise flats are not suitable for families, so who would be living in them? Not local families in need of better housing. • where is local housing need matched to these developments? Do we need huge developments for people without children? • these developments would destroy the character of the local area. An area with one of the 'magnificent 7' cemeteries, one of the 4 Waterloo churches which is a grade 2 listed building and many more recent developments which has made West Norwood a place to visit • the development would mean loss of light, amenity and visual skyline for residents • a loss of wildlife and protected trees • increased pressure on local amenities - travel, traffic, schools, GPs • a further deterioration in air quality and traffic chaos <p>I have no objection to further development in West Norwood for necessary housing. I do, however, have an objection to undemocratic plans that do not address the needs of the people of West Norwood and those wishing to move here and totally ignore previously agreed Local Plans. These are not plans for affordable social housing - families</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>should not be forced to live in high rise buildings. We should be proud of our surroundings and not decimate the area. Look at Lewisham town centre, it's a mass of high rise buildings unsuitable for much of the demographic in housing need.</p> <p>Norwood Planning Assembly are offering to work with Lambeth to achieve Lambeth's objectives for more housing, but in an environmentally friendly way and more sympathetically with regard to the community. I appeal to all councillors to rethink this plan, scrap any proposal for high rise developments and go for a democratic option for achieving housing for those in need.</p> <p>I am sending a further email as my previous one I realise was concerned more with Site 19. This is evidence of how difficult it is to navigate around in order to get objections to the right place.</p> <p>I now realise that site 18 proposals would literally rip the heart out of West Norwood town centre. This is appalling - I can only presume it comes from Councillors who don't know, still less care about, the area. Anyone who does know it couldn't possibly think this is a viable option. Development and the town centre can co-exist. This plan being put forward is a travesty.</p> <p>New plans need developing with the local community and then kept to. We had a 5 year plan in 2021 - let's go back to that and develop it further together. Local democracy rather than Stalinist central control!</p>	
Individual	R0211	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. It is with extreme disappointment that I write this email.</p> <p>Why are these plan for development being proposed without proper consultation with the local community? Do you know the area better than we do? We should be properly consulted. There seem to be so many problems with the proposals as they stand. Where is the ambition? Why are we being sold such a second rate half-baked concept? Do these proposals properly address the changes to work practices that covid has brought forward? For instance, are these homes suitable and large enough for people to work from? Surely the density should be lower and the flats larger? The parking provision should be obvious and the green credentials should be championed. The design should be world class.</p> <p>Has the impact the additional traffic this massive development will produce been factored into the awful congestion that already exists on Norwood Road during peak hours? It is grid-locked between 7am and 9am and again between 4pm and 6pm. More and more locals are pushing for residential road closures that will cause even more traffic</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			displacement and this development will make matters even worse. Is the thinking around this development properly joined up? Where is the master plan for the whole area? Where are the impact statements that prove local services will be able to cope?	
Individual	R0213	Other	<p>This is my personal appeal to you to remove Sites 18 and 19 from this current consultation.</p> <p>These are massive development plans that will radically alter the character of West Norwood. Yet the community has not been properly consulted.</p> <p>You micro-manage consultations about changes to traffic - but then you surreptitiously threaten to dump this vast development on us without attempting to win public support or approval.</p> <p>This kind of high-handed disregard completely undermines the good work the Council and Councillors have done to consult residents on other projects that affect them.</p> <p>We expect better of you!</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0220	Other	<p>I am a resident of West Norwood, on Lancaster Avenue and writing with regards to the above proposed developments.</p> <p>I am generally supportive of developments that result in positive benefits to the local community but there hasn't been much time in the recent consultation to give the proposed developments due consideration. I would therefore kindly request that the above be removed from the current draft in order to facilitate a broader engagement with the local community. I have separately written to you to request that the above proposals be removed from the current consultation.</p> <p>In addition, I would like to raise the following points.</p> <ol style="list-style-type: none"> 1. Both sites but Knolly's yard in particular can do with a redevelopment. In general, therefore this is a positive direction of travel. 2. However, given the scale of each development, it is important to consider the wider issues 3. Both developments appear very cramped as well as tall. It is therefore difficult to imagine how the local infrastructure can support them. 4. The very high density would appear to contradict the London Plan 5. The design considerations have not been disclosed, including size of dwelling, expected increase in local populations etc 6. The design is out of character with the local area 7. In particular, the height of the proposed buildings will cause the developments to stand out in a brutalistic manner <p>Appreciate your consideration of the above points and I look forward to hearing from you.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0221	Other	<p>I am writing regarding site 18, I am the business owner and lease-holder of [address redacted] As a lease holder my concern is regarding loosing my income, as I have 12 years left of my on the shop. Question: When will the demolition of the site being? Will lease holders have to make deals with the landlords regarding negotiations? Would lease holder receive options to relocate to another commercial property? Would a cash settlement to move out lease holders, would it be fixed or if not, what factors would be considered? How will the council compensate for loss of business by the proposal, as people and our customers move out of the area? Will business like mine receive tax relief due to offset loss of future business? How long will I receive to move out with my business equipment and stock? Will the cash settlement be taxed, and if so would this be compensated for? After the construction of the new site would I as a previous lease holder receive the same lease rate and priority to relocate back?</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0224	Other	I am writing to object to the proposals for Site 18 and 19 in West Norwood. Please develop new plans in consultation with us that are in keeping with the local area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0226	Other	<p>I demand that sites 18 & 19 are removed from this consultation and that new plans are developed with the local community. I object to site 18 because</p> <ul style="list-style-type: none"> - No adequate public consultation. - Destroys the character of the local area. - Threatens local homes and businesses. - There is nothing about Lambeth's net zero target for 2030. - This includes an 11 storey tower, which breaks Lambeth's own planning rules. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R0227	Other	First, decisions of this magnitude should not be made without public consultation. Local views are referred to on your site, but very few people know about these proposed development sites. I only found out yesterday; one of my sons was alerted today because he received a flier from a local action group and a lady who lives on York Hill Estate was also unaware of the proposals until I told her and this proposed development is almost literally on her doorstep. It flies in the face of the aims of the Localism Act 2011 that local people, those effected by the	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>proposals, are not canvassed for their views before a decision is made. Second, it is stated in the Vision document and elsewhere that Site 18 “is appropriate for tall buildings”. A tall building is 35 meters, so 115 feet and 11 storeys high. The vast majority of Norwood Road is 3-4 storeys high. The vision is for buildings of 5-6 storeys on Norwood Road and for the 12 storey block to be hidden in the middle. 5-6 storeys is about twice the height of the buildings that will remain on the other side of Norwood Road. This will result in a very lop sided looking high street. The vast majority of the houses in West Norwood are Victorian or Edwardian 3 storey, so tall buildings will be out of place. I do not think that West Norwood is the right neighbourhood for tall buildings.</p> <p>Third, while the visual impact has been considered from the Heritage sites and Conservation areas, it has not been considered from either the higher or lower ground. The 12 storey block will be far from hidden from Chatsworth Way and those roads parallel to it, it will dominate, as it will from the Royal Circus and the roads overlooking West Norwood. The visual impact will be significant and completely out of character with the rest of the neighbourhood.</p> <p>Last, Norwood Road is a lively shopping street serving quite a large area. We need those facilities because of the distance to other retail facilities, especially for those who rely on public transport. It is currently envisaged that the whole existing site will be demolished and that when rebuilt, that at least 50% will be shop use. The current usage is almost 100% retail, with the exception of Effes, the garage and Knowles. 50% is not enough. The local community needs fishmongers, B&Q, opticians etc. Design led optimism of development capacity is said to mean to ensure developments achieve the best outcome and benefit for local places and communities. Our community should be part of this process. How else will it be known what benefits us?</p> <p>The present plan will mean the loss of many businesses on which the local community relies. They served us well during the shop local campaigns and continue to do so. Once they go, they will not come back. Not a great reward after being battered by Covid but surviving. We also need the other businesses on the site, the car repairers and scaffolding businesses.</p> <p>Granted, the B&Q building would not win a design contest, but using that criteria, vast swathes of London should be demolished. Demolishing the whole shop frontage will destroy the ambiance of the town centre and a number of Victorian buildings with it. The Elephant and Castle is being re-developed on grounds of aesthetics, but the current proposal is for a huge chunk of architecture to be put in the middle of our town centre.</p>	

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			There is scope for the provision of low rise housing within the site, but the present proposals will rip the heart out of our shopping centre. West Norwood has a strong sense of community and has the ambiance of a market town. Part of its character is the mix of businesses and architecture. I have seen shops come and go, but they are always replaced because they are needed. We neither want nor need to be reconfigured, so this site should not be designated as a SAPDP.	
Norwood Society	R0228	Vision	<p>We object the draft proposals for the SADPD for Site 18 for the reasons set out below.</p> <p>The vision for Site 18 “This key town centre site provides significant opportunity for sustainable, mixed-use redevelopment to include new housing and affordable housing, flexible workspace, and shops and food and drink uses that contribute to the renewal of the shopping frontage on Norwood Road, helping to contribute to the ‘fifteen-minute neighbourhood’ this area provides for local people”. Also included is improvements to public realm including increased permeability for pedestrian and cyclists, and a new town centre space.</p>	Noted.
Norwood Society	R0228	Vision	<p>Whilst accepting there are opportunities within Site 18 to incorporate the Vision as set out above the reality of these proposals are different. If approved the site allocation policy would allow for demolition of all the buildings within the site boundary, this includes the oldest shopping parade in West Norwood circa 1870. It is a nonsense to “provide a clearly defined parapet line to Norwood Road to respect context and create a balanced townscape with the Victorian frontage opposite” when not addressing the importance of the Victorian buildings on Site 18. The central part of the site is considered appropriate for a tall building of 36m, more than twice the height of the existing buildings. Allowing tall buildings on this site is totally inappropriate especially one 36m which would stick out like a sore thumb and dominate the town centre. Although we would welcome investment in new homes and improvements to retail the wholesale redevelopment of this site would impact on the retail heart of West Norwood that consists of predominantly independent retailers with low vacancy rates.</p>	<p>Following the recent consultation and in response to the representations received, the boundary of the site and the indicative massing of the buildings proposed have been revised. The revised site allocation for Site 18 is included in the SADPD Proposed Submission Version. The revised boundary excludes some of the retail and food premisses previously included. As a result, only the section of Victorian shopping parade located between 300 and 346 Norwood Road will be affected.</p> <p>Victorian shopping parades are exceptionally common across London. Having revisited all the existing buildings for their heritage interest, officers have concluded the examples within the revised site boundary exhibit no characteristics which might deem them to be treated as heritage assets. Given that the properties are not considered heritage assets there is no policy presumption in favour of their retention. The public benefits of their replacement are considered sufficient to justify redevelopment.</p> <p>The general height the revised SADPD Proposed Submission Version proposes for the tall building located at the centre of Site 18 is 75m AOD, approximately 31 m above ground level in that location given the sloping nature of the site. This is six metres (approximately two storeys) lower than the tall building indicated in the Draft SADPD. As per Local Plan Policy Q26, a building 31 meters in height (between 9 and 10 storeys) is considered a ‘tall building’ for this part of the borough.</p> <p>The new massing scenarios have been tested through a townscape and visual impact assessment, which has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Norwood Society	R0228	Vision	B&Q is an important anchor store in the town centre and also provides essential parking for those buying bulky goods. It adds to the reason why West Norwood can be called a 15min Neighbourhood.	<p>Following the changes to the site boundary introduced in the SADPD Proposed Submission Version, the quantum of existing floorspace in commercial and community use within the site amounts to 4,316 sqm GIA, of which 1,123 sqm GIA are identified as light industrial floorspace. The SADPD PSV revised 'Land Use' section proposes between 3,000 and 4,000 sqm GIA of commercial/community space, of which at least 1,123 sqm GIA are to be re-provided as light industrial workspace.</p> <p>The amount of commercial floorspace proposed as part of the SADPD PSV would allow for the provision of large-scale commercial units such as the existing B&Q. It would also allow for the relocation of this particular unit within the Site 18 boundary.</p> <p>Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected.</p> <p>Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected impacts on the local road and public transport networks. The Transport Assessment would also include a parking assessment incorporating parking surveys and an analysis of the parking impacts of the development.</p>
Norwood Society	R0228	Vision Map	The Vision Maps for Site 18 and 19 are very misleading as they should be accompanied by a topographical survey showing ground levels relative to OD level.	<p>Noted. The map is intended to give a high-level indication of the vision for the site. Giving the sloping character of the site, referring to heights above sea level (Above Ordnance Datum, or AOD) is considered the most appropriate approach. This allows to compare the heights of the existing properties along Norwood Road, which range between 47m AOD and 55m AOD in height, with for example, buildings on the York Hill Estate side, which range between 68m AOD and 70m AOD in height. Therefore, it is not considered necessary to include topographical information in the Vision Map.</p>
Norwood Society	R0228	Other	No other Lambeth town centre sites are to be affected in the same way by these proposed policies for Site 18 and 19, we therefore believe that the consultation process must also be treated differently to reflect this. There is an established community volunteer led Neighbourhood Planning Assembly who are writing a Neighbourhood Plan. This forum should be used to develop genuinely collaborative and community driven proposals for these two sites.	<p>The scale of change proposed at Site 18 is not considered to be different to the other draft site allocations in the document. All 14 of the sites allocated in the Draft SADPD are considered to have significant regeneration potential and have been guided by the design-led approach set out in London Plan Policies D1B(3) and D3, which seeks to ensure that the development capacity on the sites is optimised.</p> <p>This approach takes into account the unique context and characteristics of each site. The opportunity for extensive redevelopment on Site 18 has been signalled in planning policy since the adoption of the Unitary</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>Development Plan in 2007. This has been carried forward through to the Local Plan 2021, where the site is allocated for mixed use development. Local Plan Policy PN7 F(i) further echoes that 'In order to incentivise land assembly and comprehensive redevelopment opportunities the density of new development should be optimised' on Site 18. Policy in the London Plan and Local Plan have been subject to multiple rounds of consultation and a public examination. The Draft SADPD must therefore follow an approach consistent with adopted Development Plan policy. Neighbourhood forums are encouraged to develop neighbourhood plans. The designation of the Norwood Planning Assembly Neighbourhood Forum was approved by the Cabinet of the Council in July 2017. However, these designations expire after five years, meaning that the designation of the Norwood Planning Assembly Neighbourhood Forum has expired before the forum has been able to produce a neighbourhood plan for the area. The council's policy on giving advice and assistance to local groups at the different stages of the neighbourhood planning process are set out in the Statement of Community Involvement.</p>
Individual	R0230	Other	<p>I am really concerned about your plans for sites 18 and 19 in West Norwood and Tulse Hill. We need to have good local consultation before making changes in our locality on a scale such as this, especially where buildings (at Site 19) would be - at 22 storeys high - hugely out of scale with its surroundings.</p> <p>Site 18 would completely change the entirety of West Norwood. Why aren't you doing a lot of consultation with local businesses, residents and stakeholder groups? You serve the public, but it feels like you are imposing a solution, with far-reaching consequences, on a locality without really doing the engagement necessary for a change of this nature. I only heard about it via an email from a neighbour, for example. I understand that you are destroying 80 homes to build site 18. The computer-generated pictures of site 18 look especially grim. Given its size, scale and likely permanence, could you not pay attention to building something that would add to the locality's beauty?</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>
Individual	R0231	Other	<p>I would like to register my strong objection to proposals for site 18. It is absolutely unbelievable that towers blocks of 11 and 22 storeys are being considered for this area. They would be an absolute eyesore and totally out of keeping with the area and low rise high street. There is plenty of opportunity to develop and improve the local area, in consultation with the community, but there has been no consultation and the whole community is very distressed that such proposals could even be considered. The proposal must be scrapped immediately and totally re-designed.</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0232	Other	I object very strongly to these proposals. High rise buildings are not good for families to live in. They are usually poorly designed, have no architectural merit & quickly fall into disrepair. I do not want to see high rise blocks in West Norwood, they will change the nature of the area for the worse.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0233	Other	I am writing to express my serious concern for the future of the community of West Norwood if the above proposed building projects (SADPD 18 and 19) are allowed to go ahead. Such vast buildings in this proposal will completely undermine the close community atmosphere that West Norwood rejoices in, and this short sighted plan will destroy the delicate nature of our neighborhood. Please listen to those who live here and do not let this planned building happen.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0235	Other	I need to add my absolute opposition to sites 18&19 especially as someone who grew up in areas of high rise council buildings now demolished I saw the absolute dire way of life of everyone nearby & living in this way. You must scrap this and reconsider all plans. Thank you for understanding	Please refer to the general response to representations made by individuals and businesses.
Individual	R0236	Other	I am writing to object to the proposals for site 18 in West Norwood. I support the principle of redeveloping this site with housing and commercial property, but I object to the height of the proposed buildings, which are not appropriate for a suburban town centre. Please revise your plans by working with local people and reducing the height of the buildings by half. This would be much more in keeping with the character of the area.	Please refer to the general response to representations made by individuals and businesses.
Individual R0237	R0237	Other	Having had the 'Site 19' plan for Knolly's Yard brought to my notice, reference was also made to Site 18 - West Norwood Town Centre. I have now had a chance to see with dismay the limited information provided on the Site 18 proposals and finding myself scrambling to respond in time. I have to ask why this very restricted time 'consultation' has not been communicated to the people of West Norwood by all possible means including through visible displays across West Norwood including hoardings, lamp-post/railing poster boards, notices in public places etc. Also why such a short time for consultation. I am writing to request that Lambeth remove 'Site 18' plan from the SADPD, due to the: <ul style="list-style-type: none"> • Profound impact on the heart of West Norwood. • No other Lambeth town centre will be affected in the same way by these development plans and tall buildings - which has to be reflected in the the consultation process. • There is insufficient time to adequately engage the community in 	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			understanding the proposals and their long-term impact. • Lambeth's current approach ignores all previous community consultations.	
Individual	R0238	Other	I am writing to comment on the site allocation proposals for Site 18 in West Norwood. I agree the site has huge potential and represents a significant opportunity to improve the built environment in the centre of the town. The site is however located in an established context with historic significance it therefore requires a high degree of sensitivity in the design and planning of this new quarter. The proposals presented propose a definitive approach for the design encouraging developers towards a particular solution which may restrict more creative design led proposals being submitted. I strongly recommend the council reconsiders their current design approach and draft more carefully worded guidance to ensure the highest quality and best practice in an urban design process can be followed.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0238	Context	The following policy documents and professional planning studies have been carried out relative to the development site. No reference is made of these documents which represent important planning thinking specific to the site. • West Norwood Town Centre Master Plan 2009 • A Plan for West Norwood and Tulse Hill: Community Evidence Base Report 2016 • West Norwood and Tulse Hill: A Manual for Delivery 2017 • Norwood Design Support NPA 2019 The Manual for Delivery represents the most comprehensive study of the area and how the site could be brought forward for redevelopment. An extensive public consultation was carried out with definitive recommendations for how the site could be brought forward for development. The Draft Site Allocation should incorporate reference to this document with evidence to support the proposed changes. No identification or background to the designers of the current proposals are given, this contrasts to previous council led studies and would help understand direction of travel of the scheme. The use of case studies to demonstrate comparable excellence in urban design would assist the public in visualising how this new development could transform the area. Developments such as Hackney Wick and Deptford Town Centre regeneration are two such examples.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0238	Site Allocation Policy	The current shop frontage at ground level is fully let and operating with a variety of businesses. The suggestion 'provide a strong active frontage on the high street' suggests the current retail offer is not strong. It is important for the policy to define the	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>nature of what type of retail offer and commercial use if envisaged, national chains or locally owned business?</p> <p>* No reference is made of the importance of Chatsworth Way in the context description.</p> <p>* Chatsworth Way is highlighted as an important axis and view point in the proposal although it is not clear why?</p> <p>* No mention is made of the state of existing wayfinding, legibility and accessibility for pedestrians, cyclists and vehicles on site.</p> <p>* Parking capacity is not referenced and yet is proposed to be significantly reduced.</p>	
Individual	R0238	Context Map	<p>The context map does not fairly represent the complexities of planning issues relating to the site. Items missing include: -</p> <p>* No land ownership is indicated.</p> <p>* No existing businesses are referenced.</p> <p>* Current land uses are not shown.</p> <p>* Current planning consents are not indicated.</p> <p>* No site photographs are referenced on the map.</p> <p>* Building names are not indicated.</p> <p>* Orientation relative to neighbouring areas or destinations are not identified.</p> <p>* Topography is not shown.</p> <p>* Existing landscaping and trees are not indicated.</p> <p>* No existing densities are indicated.</p> <p>* Scale of current buildings not represented.</p> <p>* Key views not indicated.</p> <p>* Existing parking not identified.</p> <p>* Existing pedestrian routes not shown.</p> <p>* Existing vehicular routes not identified.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	<p>Firstly, the documents produced for the consultation can only be described as obscure, opaque, difficult to fathom, laden with jargon and phrases requiring deciphering and translating - commentators particularly noted 'fifteen minute neighbourhood' - how is this to be understood. Some pictorial views appear out of date and the written documentation contains frequent references to 'no harm'. This is not credible, particularly as the document is difficult to comprehend and lacks detail - which is harmful in itself. Reliance is also made of 'glimpses through trees' - indeed readers of the documents to glean any sense have to latch on to some recognisable words to make any response.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	<p>Local Impact</p> <p>1. Local and community impact: The development would be absolutely</p>	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			huge, with the very high density and tall buildings including a proposed tower block - completely out of context with the town centre and suburb area, and destroying the character and low-rise nature of West Norwood centre and its surrounding neighbourhood and heritage, along with the destruction of the current shopping amenity.	
Individual	R0237	Other	2. The visuals provided in the documentation show an aspect depicting cold, bleak looking blocks with St Luke's Church glimpsed at the peak of the corridor. Unfortunately, the layout diagram with the proposed structures does not provide any uplifting inspiration that the development will be an enhancement or benefit to the area. The development layout looks austere, uninviting and without any architectural character or merit.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	3. The proposed development, especially with any tower block, would be visible in all directions and have a harmful impact on the views of West Norwood residents as well as having an overbearing impact on the whole surrounding area and the recognised Conservation Areas and listed buildings	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	4. The high buildings and towers would impact on the daylight and sunlight of existing homes closest to the development and would entail the rehousing of existing inhabitants of properties above the existing shops. What provision will be made for their rehousing.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	5. The development as proposed may take years to come to fruition - blighting the area concerned, particularly as noted there are existing difficulties over ownership which will take time to resolve. In the meantime other wider changes may make such a development outdated.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	6. The development will fundamentally impact on the shopping amenity of the area, relevant to all West Norwood residents. The documentation appears to give no indication of how such provision will be effectively improved or how this will be achieved in maintaining existing amenity and providing an attraction for new businesses. It is difficult to see with the development proposed that businesses would be attracted or able to afford to take up commercial space and whether after a period of potential blight the custom will necessarily be forthcoming. There is a risk of derelict shops and deterioration	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	Social Impact 7. The proposed densities on the site would require enhanced infrastructure and facilities in the community - health, education and other amenities. The claim to seek 'affordable' housing - whatever that means, especially at a time of increasing inflation, appears misleading. Indeed the cost of such a development in terms of construction,	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			extensive safety checks and verification, plus access and building issues questions such viability.	
Individual	R0237	Other	8. Most people would appreciate the requirement for suitable housing, but would look to developments to provide quality 'homes' , at an acceptable height, with sufficient space for their residents and fitting in to the local environment. The area behind the shopping area on the site of the former laundry is suitable for possible housing but with the roof lines being in line with the slope of the hill without impinging on the housing estate behind. The mention and seeming justification in the documentation for the height of the proposed buildings being compared to the height of the buildings on the York Hill estate are spurious and unacceptable comparisons.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	9. The view of gentrification of such a development has been suggested. The density and reference to one and two bedroom accommodation suggests that the proposed development is mainly designed for couples, single people, or possibly one child families. The development proposal along with the affordable tag, appears therefore to fall short on the mix of accommodation and not to have scope for much needed social housing.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	10. There is an indication of the provision of business units and office space. This is welcome if suitably placed within a development, and not obtrusive and disturbing to residents. However, this also has to be balanced against existing provision within the area, particularly if this is not being fully utilised.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	11. The shopping area forms a main focus of the town centre. It may not be perfect, but that is true for most centres, and there seems to be no reasonable case for it to be subject to major redevelopment, causing major disruption to the town centre and the people living in West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	12. Some commentators have welcomed the prospect of modernisation of the shopping area, but mainly focusing on the dislike of certain shops, and looking to the introduction of certain chain stores. However, others have recognised the improvements that have already taken place and the organic development of the shopping area, which over time may give scope for more up-dated shopping provision. Indeed pragmatically certain commercial outlets such as the petrol forecourt remain a necessity for many, until such time as eco-fuels and the manner of their distribution make such places redundant. Comments have also favoured the B&Q building and pointed to the significance of its parking space for a necessary air ambulance landing. Council decisions through change of use and licensing can also now and in the future contribute to the favourable shape of future shopping	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0237	Other	13. The development plan proposes a town square area amongst the proposed structures, however its presence within the plans is unclear. The necessity for such an open space is a concern, unless it is of sufficient spacial size and easily policed, as enclaves for anti-social behaviour and criminal activity would be unwelcome.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	Transport and Traffic Impact 14. The proposed development will have a massive impact on local parking, traffic and air quality. For a development proposing so many dwellings there will be a huge increase in the numbers of cars, delivery vans and service vehicles. The provision for parking spaces does not appear to be properly addressed. The surrounding roads and housing estates do not have the capacity to absorb additional parking. Therefore parking would be an issue in an already very congested area. At present the current lay out of the town centre behind the shops provides very limited parking spaces, and would benefit from more.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	15. The proposal suggests a roadway linking York Hill and Lansdowne Hill which might help relieve congestion in the main road. Both roads are hilly and relatively narrow and in no way could support additional link road traffic. Any such attempt would create excessive congestion and high road maintenance costs and need for pedestrian safety infrastructure.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	16. The development in both its construction and completion would pose greater traffic congestion and inevitable increased pollution and reduction in air quality posing a threat to the health of people in the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	17. A cycle lane is suggested within the proposal - although this may be a favourable contribution to encouraging exercise and green based transport, the location and routeway of such a lane is unclear. It is difficult to see how a cycle lane could be easily introduced, in such a congested area, other than possible patches of cycle lane, which retains the risks of cycling on the congested parts. Even with cycle lanes their design needs to be sympathetic to the safety of pedestrians.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	Economic Impact 18. A vibrant and functioning commercial town centre is significant for the economy and the spirit of an area. The present town centre may not have all the outlets that people would desire, but it does possess its own character and community feel. The proposal with its bleak design and uninspiring visions looks as though any economic and community sense would be compromised, especially with potential blighting over many years.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	19. The development indicates the scope for business and office provision, although this is somewhat vague. Any employment facilities,	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			provided suitable and sympathetic to the area and providing for locally based employees are welcome, particularly in current places suitable for such development. This does not include the destruction of the town centre to gain such places,	
Individual	R0237	Other	20. Any such plans raise questions of how such developments are to be afforded and where does the accountability lie. Mention is made of 'affordable' homes with no indication of how such homes are to be financed in a time of inflation and when social housing is needed. Aside from the horrors of Grenfell, the aftermath has uncovered negligence, poor construction, the use of inappropriate and unsafe materials. Responsibility has been dodged, along with problems locating those liable and responsible. This impacts on all those affected economically and socially. Currently the documentation acknowledges ownership issues on the site. What assurances can West Norwood residents be given that those responsible for the development will be properly accountable and financially responsible. Also that investment in the development is covered by 'clean' money and ownership and any relevant interests are not hidden by shell companies.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	Environmental impact 21. The proposal's limited information alludes to the introduction of trees, a square space, and cycle lane, but give little indication of how they benefit the development. The increased congestion, pollution and increased carbon footprint associated with the development are not addressed.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	22. One of the proposed blocks is so tall that as well as being out of keeping with the area, it will be particularly exposed to all the environmental/climatic elements - including the possible risks to birds, helicopters and drones, particularly in strong winds.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	23. Limited mention is made in relation to flooding, but the matter of sewage with such a large development appears to have been overlooked. Water board works are a constant feature in the area and utility factors should be considered in any proposal.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	24. The environment in which people live is important for their health, including their mental health and well-being. The proposal as it stands with it bleak vision suggests that the Council and NHS will have to invest in increased mental and social service provision for West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	Overview/Points 25. The proposed Site 18 plan is totally unsuitable and out of context, for the character and heritage of West Norwood. Please remove it from the SADPD.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0237	Other	26. A commentator has very aptly made the point about West Norwood:- 'others may look on with envy at our community, it's mix of business big and small, with independence growing. We have an industrial area too, making it a working community. I do not want to loose this with thoughtless development which doesn't take into account the needs and wishes of the people who live here. Growth isn't always about money, wealth is in people and healthy thriving communities who support each other. We need to continue to grow in our own way, not silenced and marginalised by outside organisations just wanting to plunder our rich community for their greed. '	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	27. There appears to have been no serious attempt by Lambeth Council to inform local residents and businesses of the seriousness of the developments proposed for West Norwood. The information on the website, for which not everyone may have access, is inadequate and couched in terms suggesting no discord or harm to give the impression there is no difficulties with the proposals.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	28. Please can copies of all documentation, with any amendments/corrections where appropriate, be deposited at West Norwood Library in a place that can be viewed by residents of West Norwood, and supplemented as and when there is more information.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	29. Please can residents of West Norwood also be notified by mail of consultations the Council representatives propose to make on the West Norwood Site 18 and Site 19.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0237	Other	30. Comments made by others suggest that the proposals presented involved no input from elected representatives for West Norwood. What can be deciphered from the proposal shows a lack of understanding of the layout, strengths and weaknesses within the area, and most importantly the people that live in West Norwood. Autocracy maybe in vogue, but democracy supposedly still prevails, and the voice of the people should be heard. Elected representatives for West Norwood should press for those responsible for an essentially jargon loaded/nonsense plan and lack of communication strategy to be held to account. West Norwood residents also deserve a public apology from Lambeth Council. Thank you	Please refer to the general response to representations made by individuals and businesses.
Individual	R0238	Other	The evidence and recommendations proposed for Site 18 to justify the 'design-led optimisation of the site' is a missed opportunity to ensure a new development of this scale and significance is developed with the correct balance between commercial opportunity, community cohesion and excellence in urban design and architecture. This site, located close to the historic centre of West Norwood's, is unique in the borough and should be afforded a coherent vision and approach for its future legacy.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			The design proposals the evidence purports to understand have not been clearly presented. Based on the 'Vision' statement and 'Site Allocation Policy' the proposed design makes an unconvincing assessment of existing infrastructure and historic context or argument for justification of use, scale and massing, impact on amenity and townscape. The recommendations proposed appear to water down the standard set in the Local Plan and omit key issues of use, community engagement and sustainability.	
Individual	R0238	Evidence	Para 2.24: Routes, Access, Servicing and public realm Existing servicing, commercial and retail access is far more complex as suggested. There is currently a one way vehicular access to B&Q roof level carpark and around Waylett Place. Waylett Place car park provides valuable public realm, currently used for Covid testing. This sits on the site of the former Thomas Place indicated on the 1870's map. Therefore this current public open space forms an important part of the historical grain of the area. No justification is given for the loss of this public realm.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0238	Evidence	Para 3.1: Key Principals The following items should be added as 'site -specific design drivers': - *All relevant Heritage Assets including the setting of the St. Luke's church, West Norwood Cemetery, West Norwood and Lancaster Avenue Conservation Areas. * The pedestrian experience within the site only along Norwood Road should be clearly identified. * The retention of existing businesses and active encouragement for new local start-up businesses with the provision of affordable workspace and commercial units. * Community engagement.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0238	Evidence	Para 4.2-4.3 Plans * The 'conventional' commercial blocks at ground level provide deep plan sizable units suitable for larger retail operators requiring anchor stores. This type of retail unit does not seem suitable set against the current collapse of conventional retailing on the high street. This could lead to large unused commercial spaces undermining passive surveillance, safety and vibrancy in the area. * The scale of the block plans appear suitable for larger vehicular traffic. As the development is residential led more attention could be placed on pedestrian access and priority. The encouragement of a more creative	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			approach to the types of dwellings and businesses could help generate a more innovative design approach.	
Individual	R0238	Evidence	Para 4.4 Building Heights and Massing The 12 storey tower in the centre of the site overshadows the proposed residential amenity space directly to the north of the tower.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0238	Site Allocation Policy	Para 4.6 Plans *The introduction of a secondary circulation route is preferable in Option 2. * Alternative layout proposals should be encouraged by the policy to explore the incorporation of pedestrianised routes and a finer urban grain.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0238	Evidence	4.8 Daylight and Sunlight The use of BRE guidelines in the site layout and planning is already established within the Local Plan. There is no evidence provided that the proposed layouts have been assessed under 'Site layout planning for daylight and sunlight: a guide to good practice (BR209)'. This document discourages courtyards or L shaped blocks where the vertical sky components drop rapidly along the façade towards the internal corners. The introduction of the larger tower massing overshadows the residential amenity space to the north.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0238	Evidence	Townscape and Visual Impact Assessment (TVIA) Summary 5.1 Principal Objectives * The impact of the proposed design is unacceptable in relation to the view composition and appreciation. * The proposed townscape change is discordant and unduly dominant in its context * There is significant harm to the urban settings of the heritage assets. 5.3 The indicative approach is considered to be the optimum level of development for the site. It is not clear what this is based on, have there been alternative study's produced for the site for comparison? 5.4 Effect on Heritage Assets Image 4- Lambeth Local view and Panorama view (iv) from Knights Hill * Map not displayed * Both the local view toward towards St. Luke's church and the wider panorama of the city are protected in the council's guidance although only the cone view of the church is referenced in the assessment of both options. No mention is made of the relationship between the landmark tower of St. Luke's in the middle ground and the distant tall building cluster. The panorama guidance, which is not restricted by the viewing cone states: - 'The Development between St Luke's Church and the city cluster	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>should not diminish the viewer's ability to appreciate the contrast between the two.'</p> <p>Therefore any introduction of a tall building between the two would need to be carefully assessed, this does not appear to have been the case.</p> <p>* Images 5-14: all clearly indicate the visual impact of the taller 12 storey building. It is subjective to conclude the massing is beneficial to the townscape. It could be argued the taller massing is detrimental and harmful to the setting of the heritage assets including: St. Lukes Church, West Norwood Cemetery; West Norwood and Lancaster Avenue Conservation Areas.</p> <p>* Image 10: Why does the building need to terminate views towards it the 12 storey building when Norwood Road is the main vista not building behind the street frontage?</p> <p>* Why does the tall building announce the heart of the town centre when that is located elsewhere, it appears to propose to create a new commercial/ residential hub and draw attention to itself.</p> <p>* Image 11: The tall building is visible well above the predominate massing and therefore could be argued that it impacted harmfully on the setting of West Norwood Conservation Area.</p> <p>* Image 12: 'the tall building is clearly noticeable but not discordant with the breadth of Chatsworth Road' The change of scale is clearly significant from this view, it is not clear why pathfinding is important to the town centre as the building massing increase here in any case signifying the shopping parade?</p> <p>* Image 14: 'The highest part of the indicative approach is glimpsed from the backdrop' - it would be useful to compare this against a lower massing to assess which option is more suited to the setting.</p> <p>* Image 15: The image depicts the view of a full development, has the impact of the tall building been assessed relative to the existing buildings on the corner of York Hill and Norwood Road being retained?</p> <p>* Image 16: The tall building 'announces the presence of the town centre at the end of the vista', is this appropriate within the Lancaster Road Conservation Area, the proposed massing could be interpreted as harmful to the heritage asset.</p> <p>* (Image 9 label incorrect)</p>	
Individual	R0238	Evidence	<p>In conclusion the evidence presented does not adequately justify the site allocations design proposal and potentially restricts the potential of a new development by leading a developer into prescriptively following the proposed design. The Townscape and Visual Impact Assessment is highly subjective and prematurely assesses an undeveloped design proposal. The site recommendations suggested could be improved with more clarity of what a new development might bring to the area. The</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			principal of the site allocation is very ambitious it is of critical importance that the aspirations of the community and best design process be sought for this important urban development.	
Individual	R0239	Other	<p>I wish to request that Sites 18 and 19 are removed from Lambeth's current high density plan and that new plans are formulated in conjunction with the local community.</p> <p>I live in Lancaster Avenue and the plans for Site 18 remove a substantial number of shops that I use on a daily basis, as well as one of the best pubs in South London - Knowles of Norwood. The proposed building heights also appear completely out of character with the area. I am extremely unhappy about these site plans. Please remove these current plans from the consultation and produce more reasonable ones backed by local residents. I welcome redevelopment of unused land and provision of more residential properties but these plans have not been formulated on any sensible basis. Even trying to look at the plans online sends me a message that the online site is not secure and my PC could be hacked - which is a disgrace.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0240	Other	<p>i am a business tenant and resident. i am concerned that plans to develop the area may result in a missed opportunity to create a unique and very special zone for the people who live and work here and of course the visitors</p> <p>we really need make it attractive for people as a destination to meet and greet and be industrious</p> <p>we have a note in the lambeth plan that a creative zone is being promoted in norwood high st</p> <p>we have the plan to preserve the industrial zone near the bus garage sadly things have happened recently that will blight the area around tulse hill traffic junction no consideration has been given to peoples opportunity to build a hub for small business in tulse hill</p> <p>i am very sad that the two keys sites have been allocated as housing without any consideration for affordable economic space</p> <p>times are such that commuting is expensive for working people so why is it that we offer nothing locally for people to expand their creative and networking aspects of their lives</p> <p>we are seeing similar concepts of accomodation only in and around brixton rail junction</p> <p>so where are people to go</p> <p>what is happening with the site behind tulse hill station</p> <p>what on earth is going on around here these days</p> <p>there is love and energy in every street of our community</p> <p>but by withdrawing hope from our life equation what have we left</p> <p>traditional views and expectations are simply not good enough</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>why should people feel they have to trek down to brixton or go over to peckham to have fun and meet and be with like minded people when we can easily adapt what we have here and bring it to life</p> <p>give us value in our lives by giving us a multifaceted balanced hub or satellite which will permit people to meet and greet in an affordable manner and avoid wasted time trekking around town in cars and public transport leading to time consuming drains on our energy when we can have everything on our doorstep</p> <p>who is leading the charge to adapt</p> <p>does not lambeth have a duty to their brethren to give them everyday joy in their communities</p> <p>every flat and housing development of overdevelopment will blight the areas look and feel if there is nothing to go there to do other than eat and sleep and watch telly</p> <p>what is the point of boxing people up in their homes when we can give them so much more</p> <p>give us the variety and economic tools to fulfil our lifestyle dreams on our doorsteps</p> <p>we are here to make a future and the plans for area 18 only cater for the few that will live in the homes which in effect denies everyone else the enjoyment of those spaces</p> <p>the theme here is like the victorian times build homes home homes</p> <p>we had the glorious crystal palace as a hub in those days</p> <p>planners thought about what people needed - shops, food, open spaces</p> <p>parks are such amazing places</p> <p>we need to see the authorities paying regard to what we need</p> <p>technology requires us to be sat at a screen every day and have a phone on the go</p> <p>carrying laptops and phones with no where local to go</p> <p>give us open format workspaces, purpose built</p> <p>here are some notes i sent to station to station business team</p> <p>.....</p> <p>i would like to say that it is indeed inevitable that the sites get developed. we must team up with all those concerns to make sure there are</p> <ul style="list-style-type: none"> * Affordable homes for key workers * Affordable workspaces for startups and creatives * Affordable retail for social meets and consumption of food and drink <p>so its likely they will fall under three categories</p> <ul style="list-style-type: none"> * flats and studio living spaces * class E workshops * retail 	

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>i know this is a repetition of what you are saying but i think it's important to say that although we can moan about the impact which we will of course manage as best we can but it's the style of the outcome that is most important</p> <p>affordable spaces to live in, to create and produce, to meet and greet hope this helps. let's break the thread of selfless spaces and isolationist ideals. set us free by giving us something to relish. something for everyone. not a library or community hub. something more. something unique that meets the demand. i can't say what exactly but i do think we have to take the view that micro communities or villages have better quality of life and offer more sociability. can we please have that concept tabled at the planning stage. the heart of the high street could become a hub for social and economic wellbeing</p> <p>may i also inform you that the pop star Adele had a flat in the block where knowles bar exists. she has a love for the area. maybe she will write in to you</p> <p>we love west norwood</p> <p>it's a great community</p> <p>help us please</p>	
Individual	R0242	Other	I am writing to oppose plans to build up mega blocks in Lambeth. It is a monstrosity that should never happen.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0243	Other	<p>As a home owner of SE27 I must strongly request the removal of the above from the current consultation.</p> <p>The grounds for this objection are as follows:</p> <ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • These are the only two sites with recommendations for tall buildings. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact • This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. • As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes: • It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. The sites will dwarf the local area destroying the character of this community. It will add to already unsustainable levels of noise and traffic air pollution and place un due pressure on local public services. The sites as I understand it are not viable for affordable housing so go against the very great needs that London and our borough in particular need.</p> <p>I would therefore like to be kept appraised of why Lambeth are considering this.</p>	
Individual	R0244	Other	<p>I am writing to voice my strong opposition to the huge developments proposed for West Norwood high street.</p> <p>I am angered that there has been no public consultation about this development with the local community, and as a long-term resident of West Norwood bringing up my family here what you are proposing affects us all. The proposals will ruin the character of the local area, dominate the skyline, will destroy protected trees, wildlife, light and local amenities. There has been nothing heard about Lambeth's Net-Zero target for 2030 with these proposals and no vision for a town centre fit for 2050 and beyond. This is our area and our children's area and their future and none of this has been considered or been put out to consultation.</p> <p>I demand that the proposals for Site 18 and Site 19 are removed from this consultation and new plans are developed along with the local community and our future sustainable environment.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0245	Other	<p>I strongly oppose the proposed plan for “ developing “ the areas above. The plan contradicts all current values and trends and the recognised needs of human beings to bring about balance between Nature and our requirements of the environment. Our need is green space, breathing space for us, our families and descendants, not more invasive damage to our home, the Earth, with mega structures that isolate us from the elements that are utterly essential to our health and well being.</p> <p>Small is Beautiful.</p> <p>NO MEGA CONCRETE BLOCKS IN WEST NORWOOD AND TULSE HILL</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0246	Other	<p>I'm writing to object to the new site 18&19 plans in west Norwood. It's going to completely ruin the high street and as a resident and member of the community I am asking that the proposed plans get amended with sign off and input from the community.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0247	Other	<p>I moved to West Norwood from Crystal Palace seven years ago. I love it here. I, like many others, walk up to the High Street and shop there every day. I use many of the stores on the North side of the street. West Norwood is a lovely community - we are keen to use our local shops and amenities - we want them to thrive. We now have the cinema/ library/ community complex, The Feast, and the High street plays a large role in that. Please do not take our High Street away from us - it is our focal point and we need it. Please do not dismantle an important place to us, but nothing to you.</p> <p>Are you imposing this on us because we do not seem to be a strong and salubrious community, as are Herne Hill and Dulwich? Do you feel that you can impose your plans regardless of the lives and views of the people who live here?</p> <p>You have made these proposals from a distance - with no understanding of our community at all.</p> <p>Could we please have a meeting between your Council and the people who live in and love, West Norwood. Please reconsider your plans. We love our High Street and need it.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0248	Other	<p>I have just become aware of the proposals for the hideous developments at what are with disingenuous simplicity called Site 18 and Site 19. These proposals will have a hugely harmful impact on the area. Why has there not been wider consultation about them? They will grossly transform the character of the area. They will make West Norwood look like a replica of Croydon, and that is most emphatically not a compliment. They must not go ahead.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0250	Other	<p>I strongly oppose this proposed development.</p> <p>It will completely destroy the proportions of existing buildings in the high street.</p> <p>It will greatly increase traffic and congestion.</p> <p>Somebody has seen fit to create flowerbeds down the road which will greatly enhance the environment.</p> <p>These proposed buildings will tower over and take light from a busy community.</p> <p>It appears to be a plan to make a lot of money for someone with no regard to the effect it will have on the high street.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0251	Other	<p>I write to object in the strongest terms against the above plans, and the ludicrously short consultation period. These two proposed developments are:</p> <ol style="list-style-type: none"> (1) against the previous commitments given by the Council, (2) inappropriate to the history and community of Tulse Hill and West Norwood, (3) they are on a scale and in a form that puts unsustainable strain on 	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			our services and infrastructure, (4) they will drive out local small industry employers through loss of workspace, and (5) the local community has repeatedly said it is against this type of development in the area. Time and again Lambeth has shown itself to be incapable of coherent joined-up thinking, and this has to stop now. Our local community must be involved in discussions about our future!	
Individual	R0252	Other	Having seen the new development plans for site 18 & 19 I join the local community in demanding the removal of the proposals from this consultation and new plans developed with the local community and residents.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0253	Other	Remove site 18 from your planning consultation.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0255	Other	I object to the proposed development site 18 and 19 in West Norwood. They would have a terrible effect on the town centre and the local community. Nor fit for the area	Please refer to the general response to representations made by individuals and businesses.
Individual	R0256	Other	Remove from consultation new plans with local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0257	Other	This proposal beggars belief and would be laughable if wasn't true. What genius came up with this horrendous plan and where do I start? Site 18 tower blocks visible for miles, an eye sore and out of keeping with the area's character. Is this Lambeth's version of a Corbusier type cities in the sky, I think not. Which type of purchaser would be interested? Social housing or luxury flats – there are already thousands of private units like this on Southbank which are unsold. Highly unlikely any of the major developers would be interested in these schemes in the current inflationary climate and drop in living standards so where are the development funds coming from. This huge development will put incredible pressure on public and transport services let alone pollution, I would hate to live here if this development took place. What happened to Lambeth's carbon neutral/green policies. There would also be a big loss of businesses and jobs to create this development. The thought of this huge development is absolutely terrifying and absolutely oppose this development.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0259	Other	I demand the proposals for Site 19 and Site 18 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0260	Other	Today I was left gobsmacked learning about the proposed development of tightly packed residential units and huge towers in the heart of West Norwood. I've moved here recently, after years in North London,	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>charmed by the sense of community and authenticity this neighbourhood has. I've met like minded people and started a family here. There couldn't be a place I'm more fond of.</p> <p>It feels like in these proposals the community is completely forgotten. Seems like an afterthought that in this planned scenario we'll lose independent retailers from our high streets, or that the historical houses and flats on our hills will lose completely or have their views of the city dramatically limited.</p> <p>I'm appalled at the proposal. Please do the right thing and remove those two sites from the current consultation. Come back to the community with a plan that will invest in the neighbourhood and its community, that will transform wasted spaces in eco-friendly spaces, green spaces, community spaces and safe and affordable new retail spaces for independent businesses as well as affordable housing.</p> <p>There are plans and suggestions being drafted in constant dialogue with community representatives.</p> <p>This isn't a mindless opposition for the sake of opposition, it's the willingness to see value added into the neighbourhood and it's community and to see a development initiative that it's sympathetic to the neighbourhood identity.</p>	
Individual	R0261	Other	<p>These disgusting plans must be withdrawn immediately.</p> <p>There has been no consultation that I am aware of within the local community.</p> <p>This development, if allowed, will totally and completely destroy West Norwood turning us into just another soul-less and characterless urban jungle.</p> <p>There is a real community feel about West Norwood which large swathes of London does not have, something which should be treasured, not just thrown away like rubbish.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0262	Other	<p>I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.</p> <p>Furthermore I have been made aware that Lambeth's consultation process excluded residents that are not online and don't have access to the Internet.</p> <p>This is NOT a public consultation but a state diktat comrades</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0263	Other	<p>It is with great anger and disappointment that we write to you regarding the proposals for the development for Site 18 and 19 in the West Norwood / Tulse Hill area.</p> <p>We have lived in West Norwood for 30 years and have seen many changes, however our area currently retains it's essential character with its mix of local businesses and low rise buildings which has clearly attracted a vast number of new people to the area.</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Our objections are as follows:</p> <ol style="list-style-type: none"> 1. The proposals as they stand will change the character of our area beyond redemption including, as it does, a high density plan that will replace 25% of our town centre with a plethora of high rise buildings including an 11 storey tower which breaks Lambeth's own planning rules. 2. We are concerned about increased pressure on local services 3. We are concerned about increased traffic and therefore worsened air quality, and the likelihood of further parking problems. 4. We have concerns about the closure of our mix of local and independently owned businesses and subsequent job losses. 5. We are concerned that our visual skyline will be adversely affected due to the height of the proposed buildings and the village feel that we enjoy will be destroyed. <p>We demand the proposals for Site 18 and 19 be removed from the current 'consultation' and new plans be developed with proper public consultation with the local community, over an appropriate and legal time frame, in order to create a plan which will be in line with the character of our area and reflect the needs and wishes of local residents.</p> <p>As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes:</p> <p>It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.</p> <p>We would like to know why the 2017 Masterplan has been thrown out and how Lambeth can go forward with plans that have had no time for proper public consultation with the local community.</p>	
Individual	R0264	Other	please remove these from the consultation	Please refer to the general response to representations made by individuals and businesses.
Individual	R0265	Other	Please think again about the proposed developments, Sites 18 and 19. These would change the heart of the town centre, permanently and to its detriment, after little or no community consultation. We need affordable housing, but local people should be involved in its planning - with the possibility of organic development within an overall plan - and very serious thought should be given to the introduction of such tall buildings, out of keeping with the rest of the area.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0268	Other	<p>I am writing to request that proposals for Site 18 and Site 19 are removed from this consultation and new plans are developed. There has not been adequate public consultation and part of the plan actually breaks Lambeth's own planning rules.</p> <p>What this does is destroy the character of the area, businesses will close, local jobs will be lost, cause traffic chaos, reduce air quality, loss of light and visual skyline for residents. The list continues....</p> <p>It would be good if Lambeth listened to the concerns of their residents instead of bulldozing plans through without thought for those who have to live with it!</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0270	Other	<p>In response to the Site 19 and site 18 developments. I demand the proposal for Site 19 and Site 18 are removed from the SADPD. These developments are huge with a very high density, akin to central London, not a suburb. And with a 22 storey tower would have a profound effect on the heart of West Norwood and Tulse Hill. As well as wrecking views and the skyline.</p> <p>The scale of the development is totally out of context and would destroy the quiet, low rise nature of the west Norwood neighbourhood. No other Lambeth town centre will be effected in the same way. The transport, parking and air quality impact would also be massive along with removing specially protected trees and valuable wildlife.</p> <p>I demand the proposal for Site 19 and Site 18 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0271	Other	<p>I am writing this email as I am opposed to the developments (site 18 and 19). The local community ought to be consulted.</p> <p>How are we going to reduce air pollution if there is an increase in traffic ??</p> <p>Public consultation please</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0273	Other	<p>We, the residents of [address redacted], demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0274	Other	<p>I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community. I am writing to express my complete opposition to Lambeth's plans for Sites 18&19 in West Norwood.</p> <p>This proposed plan will completely destroy the heart of West Norwood, our high street and our businesses. West Norwood is a very tight community, which supports local community incentives like Feast, as well as independent retailers. The town centre (site 18) would be completely demolished at the expense of more than 80 families and the loss of more than 20 existing businesses, not to mention the destruction</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>of our low rise high street to be replaced by a completely out of place high rise building (or buildings).</p> <p>Why does Lambeth think that Tulse Hill and West Norwood are easy targets to steam roll this type of initiative which is lazy and shows no consideration for the local community. Has anyone thought of the massive impact this level of new housing will have in local schools, GPs, transport, traffic....etc??</p> <p>I think we deserve a proper consultation on what to do with the development of our high street. This should be a considered plan that takes into account the needs of the local community, not just financial gains for the council. We want to retain our vibrant community and thriving businesses.</p>	
Individual	R0275	Other	<p>This looks like a great improvement self-serving groups like NAG do not represent all but a minority view of self-serving freaks.</p> <p>Don't forget safe cycling facilities.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0277	Other	<p>So many issues here - height, servicing, mix of uses, protection of existing businesses (are you going to bin B&Q?) parking for the residential, destruction of our victorian heriage buildings fronting the high street. So many issues - that this site MUST be removed from the draft site allocations plan until proper wide-ranging local consultation is carried out. I am not a NIMBY, but it is not good to find these impoartant matters being decided in what appears to be a vacuum.</p> <p>This seems to be a thing with Lambeth - no proper consultation, though you seem to be ticking the boxes. What's wrong with some kind of masterplan, rather than a developer's charter, in which particualr futures schems will be impossible to object against because "its in the plan."</p> <p>Seriously, guys, this is not the way to go about this. Everyone I have spoken to in the last few days, since I became aware of it, is up in arms. I find it surprsing that, as a resident in this area for over 20 years, and hardly with my head in the sand, I am only now now aware of these two huge proposals, hidden away as "site allocations.". Where are the letters from you, coming through my door? Nowhere, that's were.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0279	Other	<p>As a local resident, I demand the proposals for site18 and site19 are removed from this consultation and new plans developed with local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0280	Other	<p>I have the following concerns about the plans for sites 18 and 19 in West Norwood:</p> <ol style="list-style-type: none"> 1.It is an overdevelopment of the sites on both regulatory and local grounds; 2. The height and density are excessive in the context of the neighbourhood; not enough qulity and too much quantity 3. The overall architectural merit falls beneath the standard required for 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			new developments and is unsuited to the neighbourhood 4. Children's provision: play space is totally unsuitable and inadequate; local schools over-subscribed. 5. Communal garden areas are too small 6. There should be more trees	
Individual	R0281	Other	I wish to register strong opposition to the proposed developments at sites 18 and 19 in West Norwood town centre. I live in West Norwood (and have lived here for over 30 years) but have only just heard about these proposals. Has there been any meaningful consultation? I have not received any contact on this from Lambeth Council, either by mail or email. As I understand, the proposals would turn West Norwood into a mini-Croydon, with a high rise block and several other very large blocks. Ours is a relatively low-rise suburban neighbourhood, and this development would completely change its character. I agree with the need to create more housing in south London. However, there must surely be better, more creative ways of doing this, which are in keeping with local characteristics, and create a nice area to live for both new and old residents. I would be grateful if my opposition to the current plans, and the way they have (not) been circulated, could be registered.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0284	Other	I demand the proposal of Site 18 & site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0285	Other	I strongly object to the site 18 and site 19 proposals. They destroy the character of the area They increase pressure on local services and make it already difficult traffic congestion even worse .	Please refer to the general response to representations made by individuals and businesses.
Individual	R0286	Other	This email is to show our strong objection to the development plans proposed for site 18 & site 19 In our view as home owners in Egremont Road, both are completely outside of any reasonable request for us as community and consultation has not been done at all. Reasons as follows (non exhaustive) : • Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact • This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. • Destroys character of the local area	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<ul style="list-style-type: none"> • Destroys all existing commercial presence on the high street • False net zero target through very high density and No vision for a town centre • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • Monster development not suitable for our area • We believe that incremental development (within an outline Master Plan) is the only way forward as it enables the development to reflect change in the way we live our lives. • Nothing in these proposals reflects the changes that Covid-19 has brought to every aspect of our lives <p>Having recently bought in the area, I am deeply disappointed that this would even be considered Please do reach out should any further clarification is needed on the points highlighted above. Thanks in advance,</p>	
Individual	R0287	Other	<p>It would seem that Lambeth is treating West Norwood as a soft touch by attempting to meet its target for new homes by cramming in as many as possible in West Norwood in a most unsightly and destructive way. Unsightly in that both sites are completely overbearing with regard to the existing buildings and landscape, and destructive since for site 18 it will mean years of upheaval and the loss of much loved stores such as B&Q, A&S Homecare, Wearabouts and Iceland. There are others too which will be lost to us and very unlikely to be replaced owing to all the upheaval and lack of space available. Who is going to want to shop in West Norwood in the remaining shops, with one side of the street a building site?</p> <p>Has any thought been given to the infrastructure, rather an important consideration for both sites? As it is, the primary schools are full, the road from Crown Point to Tulse Hill often suffers from traffic jams as it is, and the local trains are already crowded at peak times.</p> <p>It is surely now accepted that high rise and dense developments provide unhealthy living conditions both physically and mentally. This has clearly not been a consideration.</p> <p>There has been no adequate public consultation for either of these sites. Had there been, such vast and out of character developments would never have been approved. There needs to be genuine consultation before a new plan is drawn up. The people of West Norwood understand that more housing is needed but we won't be fobbed off by the council's attempt to promote these two outrageous</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			development plans as beneficial for West Norwood. Please reconsider.	
Individual	R0288	Other	<p>My concerns are about Site 18. It seems to be planning by numbers, ie produce as many dwellings and sq feet of retail space as possible without any vision of what kind of community is being sought. What makes this area a desirable place to live, particularly for families? What social facilities are there? What will make people want to gather there or choose it as a shopping venue? What is in this for the elderly?</p> <p>This area already has four mini supermarkets none of which can carry a full range of goods. Will the proposed Sainsbury's offer add anything new. What compensates us for the loss of the optician, the petrol station and the hardware store? How is the development being managed to ensure a full variety of traders.</p> <p>It all looks like commoditisation of property development rather than fostering a community, just taking what a developer is prepared to offer Lambeth to get the mandate, rather than Lambeth setting out its own vision. The lack of thorough consultation is a disgrace. The quality of staff work by the council, the developer and consultants on Sites 18 is seriously substandard, way below best professional practice. Not surprising that local people are angry, not least at the money that has been wastes on these flawed proposals.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0290	Other	<p>I have been a resident in Rosendale Road for 31 years. I love my neighbourhood and have no intention of moving; its a lovely community and I spend a lot of time in the area. My daughter lives these past 5 years in Robson Road. This is our home patch which we love dearly. I didn't know anything about these truly horrendous plans until I was leafletted yesterday. I did not hear about any of this through a public consultation, when did this happen??? We have not been told a thing. Why on earth would you want to destroy the human fabric of our community? I use these shops several times a week, it doesn't make any sense at all that you intend to replace them with high rise flats. West Norwood will LOOSE ITS HEART with these ill thought through plans.</p> <p>I beg of you to reconsider. I object most strongly to Site 18 and Site 19's planned development</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0291	Other	<p>I would like to log my complete objection to the proposed plans for site 18 and site 19 on west Norwood high street</p> <p>This is the first I was made aware of the plans and was completely shocked</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0292	Other	<p>Developments are good. If meets with Lambeth's own planning rules. And time taken to consult with the local people in Norwood as this would affect them more.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			I leave in the York Hill Estate. The 11 storey tower. Not only breaks Lambeth own planning rules. But blocks off our views and sun lights. We are only 4 storey blocks. I think someone should go round the flats and ask people what they want and like. Not many people that leaves here knows about it. Lambeth must inform their tenants, about their plans and intentions with this regards.	
Individual	R0293	Other	<p>I'm writing to say I am very concerned at the proposals you are making for the above huge site. There seems to have been little/no consultation with the community on how this will affect the current residents and add anything meaningful to the existing community. You ignore/neglect our side of Lambeth for many years and then decide to build a 22 storey development plus other housing in an area that simply cannot take that extra capacity. You seem intent on damaging rather than helping create a decent environment for people to live in. It will be an eyesore in the area and those roads simply cannot take that kind of development, plus the supporting pressure on infrastructure that would be needed to support that kind of development would be significant.</p> <p>It's very disappointing to see how you are treating the community and I hope you pause and have time to reflect on this monstrous proposal. It's rather worrying that the planning department even thought this was a viable option. There is a lack of vision for what Norwood really needs. It feels like a bad decision without any viable communication/thought behind it.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0294	Other	<p>I wish to voice my total opposition to both of these proposals for the huge tower blocks on these two proposed sites for the following reasons:</p> <ol style="list-style-type: none"> 1. An unbelievable lack of local democracy or public consultation by Lambeth Council on these proposals with local residents kept in the dark and as far as I'm aware of local businesses, 2. The fact that these tower block proposals apparently break Lambeth's own planning rules is unbelievable and possibly potentially illegal in which case therefore they should be referred to the Secretary of State for determination and/or the Planning Inspectorate, or the necessary legal process, 3. Instead of attempting to regenerate a local town centre with viable shops and businesses to visit, you show total disregard and no effort whatsoever to revitalise Norwood Rd as somewhere local residents would wish to shop regularly, instead your proposals only seemingly demolish existing premises, 4. More traffic chaos along an already very polluted and constantly congested Norwood Road with significant exhaust pollution going 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>against the Mayor of London's aim to reduce such pollution....of the same Labour political party as majority on Lambeth Council which is distinctly at odds and therefore controversial,</p> <p>5. A destruction of the local low level development of the existing character of the area over many decades with instead ugly tower blocks blocking light and amenity to some residents and business.</p> <p>In conclusion, I wish to comment I'm in favour of some limited local public and private housing provision and development but only to the extent that the present creaking road and other public infrastructure can cope with any proposals and that this must be on a human rather than industrial scale.</p> <p>I should also like to know whether it is true as I have been told that my local ward councillors, both Labour have been excluded from being involved at Council level in drawing up these proposals and possibly prevented from consulting local residents. Highly undemocratic and such railroading of pushing through these developments by some elite inner circle or cabinet of Lambeth Council is quite unacceptable in a modern democracy.</p> <p>Lambeth Council should be totally ashamed of itself for dreaming up such irresponsible and controversial proposals without any public consultation.</p> <p>I oppose vehemently these proposals for sites 18 and 19 but would be prepared to study through a proper public consultation process new plans for these or similar small overdevelopment low rise developments with a mix of housing and useful shops that serve a broad range of the local community.</p>	
Individual	R0295	Other	<p>I wish to to PROTEST in the Strongest possible terms against LAMBETH'S proposed above developments for the following reasons:</p> <p>Where was the public consolation regarding these developments ????</p> <p>These Monstrous developments are the most hideous example of inappropriate town planning I have ever seen. Has any member of Lambeth Council bothered to walk around these sites?</p> <p>The density of scale is far too high for both sites.</p> <p>No thought has been given to the massive increase to local traffic, transport and services,(which are already stretched) . It would be impossible to cope with this magnitude of the extra load these developments would bring to the local area.</p> <p>What about the loss of local jobs and businesses ?.</p> <p>The tower block on site 18 is not in keeping with Lambeth's own planning rules anyway.</p> <p>I sincerely hope common sense will prevail and new human scale of design can be put forward.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0296	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p> <p>I am writing to vigorously oppose the plans for above. As usual Lambeth is developing proposals without the full involvement of those of us that live in West Norwood, and in contravention of their own planning guidelines. The Planning Department has in the recent past supported a number of flawed planning proposals - such as Electric Avenue/ Scrap Yard Windsor Avenue that disregard their own planning guidelines and the wishes of local people. There appears to be not even a mere acknowledgement that they are public servants and accountable for their actions. This is happening again with this proposal.</p> <p>The Council are consulting on a low traffic network for the area whilst their officers supported the development of a scrap yard which would have over 150 additional HGV lorries travelling down the High Road, and promoting huge building projects such as this which will major cause congestion for years. West Norwood is a predominantly low rise family area. All the proposals will fundamentally change the nature of the area. The Council and their officers continue to support the development of high rise homes for families , which the majority of families would not chose to live in.</p> <p>It is your responsibility as Councillors to hold your officers to account and reject these proposals.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0297	Other	<p>I would like to demand the removal of Site 18 and Site 19 from this consultation.</p> <p>These are the only two sites with recommendations for tall buildings and strongly diverge from the current look and feel of the area.</p> <p>Additionally I feel here has been insufficient time from yourselves to adequately engage the community in understanding the proposals and their long term impact (increase in traffic, amenities, schools, medical centres, blocked views etc...)</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0298	Other	<p>I would like to demand the removal of Site 18 and Site 19 from this consultation.</p> <p>These are the only two sites with recommendations for tall buildings and strongly diverge from the current look and feel of the area.</p> <p>Additionally I feel here has been insufficient time from yourselves to adequately engage the community in understanding the proposals and their long term impact (increase in traffic, amenities, schools, medical centres, blocked views etc...)</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0299	Other	<p>I was very distressed to see the plans for these sites and would urgently request that they are removed from this consultation and that new plans are developed where the local community is involved.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			The current plans look totally out of keeping with the rest of the area. The size proposed would completely overshadow the rest of the neighbourhood. I urge you to reconsider as soon as possible . Thank you.	
Individual	R0300	Other	I am writing to you to please reconsider the development plans of site 18 and 19. These are plans that have not been discussed with the local community which I find outrageous considering the effect it will have on the local community. The planned works are not keeping at all with the layout and scale of other buildings in the area meaning the character of the area will be destroyed. I urge you to take all this into consideration and to consult the local community about these plans.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0301	Other	I am writing to object to the proposals for sites 18 and 19. The sites proposed are not viable for such high density residential areas and will destroy the character of the local area. The tower blocks are out of keeping with the area and would break planning rules.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0303	Other	im emailing my objections to your proposed building monstrosity why would local residents want to live in a area that looks like this? its out of step with the environment, its ugly, its a money making excercise and a good example of lambeth not abiding by its own regulations	Please refer to the general response to representations made by individuals and businesses.
Individual	R0306	Other	These high rises would be a disaster and overshadow the entire high street removing small businesses too. Please scrap these plans and engage with the community to design something West Norwood wants.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0310	Other	All members in my family at [address redacted] all members of my family object this bad proposal. Needs to be binned for all the reasons given in your leaflet	Please refer to the general response to representations made by individuals and businesses.
Individual	R0311	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Transport for London	R0312	Site Allocation Policy	We welcome confirmation that Local Plan and London Plan parking standards will apply. All existing car parking on the site should be removed consistent with London Plan Policy T6L which states that: 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy'. Due to the PTAL, this would require a car free development.	Noted.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0313	Other	<p>My name is [redacted] and I am a concerned Lambeth resident, writing to object to the proposed building of sites 18 and 19.</p> <p>My first issue with this proposal is the total lack of communication to current residents about this proposed development. I have been a Lambeth resident for 22 years and not once did I receive any communication through my letterbox, or via email, about this development until it was almost too late to object to it. Thankfully, some diligent local residents were handing out leaflets about these plans on the local high street; but it should not fall to them to do the job of the council or the building company. In my opinion, the lack of official information about these development proposals will only garner suspicion and mistrust from local residents, and should a forum be conducted in future on whether this development should be built or how to plan it better, I feel that the community will be even less likely to allow any further plans to go through.</p> <p>In addition to this, I strongly object to the proposed loss of local businesses on our high street that are necessary to our local community. Wearabouts is a place where I have personally bought my primary school uniforms all throughout my childhood, and given that it is still standing well into my adulthood, this shows that it is a business that the community needs and relies upon. To get rid of it to build housing would be doing a great disservice to the people who already live here. Where will people go to buy school uniforms once this shop is closed down? There is not another similar business to this within walking distance, and as a lot of the residents in this area rely on public transport, this is an added expense of time and money that did not have to be incurred. The loss of Iceland will also negatively impact families living on low incomes in this area, as where will they go to buy affordable groceries? The only other food shops on this high street are Tesco, Sainsbury's, and Co-op - all of which are significantly more expensive than Iceland, and as such, to knock down Iceland for this development would be to deprive already deprived people of access to affordable food.</p> <p>You may argue that there is a Lidl in Crown Point that you could go to, but for people who live in this area, transport would have to be taken to get there. Given that the Lidl car park is small, you may end up having to look for alternative parking in the area, which may be far away from the shop and/or have to be paid for; or you will have to take the bus to get there, which is an added expense. If you are a single parent or simply shopping for more than one person, the idea of having to take your shopping home by bus or having to carry it by yourself to a car that may be parked far away, will mean that you are less able to buy enough</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>food in one go. This will then incur several trips, and therefore incur a greater expense on the transport for getting there, which needn't have been necessary if Iceland were still there.</p> <p>As such, building this development would be an act of gross gentrification that would increase the cost of living for many residents who cannot afford these extra costs, and potentially push them out of our community. Therefore, I object to this development on moral grounds.</p> <p>I do understand that there is currently a housing crisis in London; however, it is my belief that the solution to this is not simply to keep stacking more people on top of each other. For example; how will you ensure that the people in the third floors and over are not disabled or elderly residents? Will there be an application system involving background checks? If elderly or disabled residents do end up in housing on higher floors, what will happen to them when the lift breaks? Will it fall to their families to ensure their safety? What if they do not have any family members to rely on - can you ensure that the local council or a charity will provide for them?</p> <p>In the event of a fire, how will you ensure that everyone will be able to evacuate safely from whichever floor they are on? Given the events of Greenfell, I believe that the public will be less likely to listen to the established guidance of staying in your home in the event of a fire, and so will attempt to use the stairs in this event. How will you ensure that the stairwells will be large enough to accommodate the volume of people that may use them in the event of a fire? How will you avoid a crush of people on the stairwells? Will there be multiple stairwells that people can use? If people with low mobility live in higher floors, how will you ensure that they are able to evacuate, given that taking the lift in the event of a fire is ill-advised? And how will you cohesively inform the residents of their fire evacuation plan?</p> <p>My last gripe with this is that not only is it ethically unsound, it is also ugly. Would you like to live next to an 11 storey housing estate? No. So why build it in someone else's neighbourhood?</p> <p>I sincerely hope that there will be some kind of official ballot sent to local residents either by post or by email, from either the council or the building company themselves, about whether we feel this development should go ahead; and the outcome of this vote should be legally binding and adhered to by those involved. If the vote ends in favour of it going ahead, then there should be some kind of community forum where people can go in person and air their concerns to members of the building company and local council directly, to ensure that the development meets the community's needs instead of steamrolling over</p>	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>them.</p> <p>I hope to hear from you soon with transparent communication about whether this development will be going ahead or not, and that you will answer each of my questions with sufficient detail and information.</p>	
Individual	R0315	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. I am extremely concerned to learn of the planned developments in West Norwood including Site 18 and Site 19 - both of which would rip through the heart of the local community</p> <p>I am shocked by the total lack of genuine community engagement on this proposal - which ignores previous examples in the area, and must insist there are removed from the Site Allocation Development Plans Draft.</p> <p>The plans would bring with them. so much extra traffic pollution, and go against the current character of this area.</p> <p>It would impact dozens of conservation areas, not to mention destroy the skyline,</p> <p>It also clearly has no concern for the net zero target for 2030</p> <p>Please don't just think about the money - but focus on the communities that live here</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0316	Other	<p>I am horrified to see the plans for the changes to the height of West Norwood to Tulse Hill planned buildings on these sites. I have lived here for over 30 years, and my children have chosen to stay to live in the area now that they are married.</p> <p>I understand the thinking is that this is a low density area. Would be interested to see the calculations and whether they factored in the large area that is in fact a huge cemetery.</p> <p>Apart from the visible blight to the area, loss of light and views for thousands of homes, the building programme will cause years of traffic delays along the main road which as a high street has already suffered from the thames water mains replacement, pavement change limiting short term parking and the loss of trade during the pandemic.</p> <p>I register my opposition to these proposals.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0319	Other	<p>I strongly object to both of these proposals.</p> <p>The lack of meaningful community engagement is reason enough to halt these immediately. There are so many reasons why both of these are completely unsuitable, not to mention unsightly (seriously these are UGLY), that contradict so many of the London and Lambeth Plan Policies.</p> <p>West Norwood is a community with a sense of pride in their retail and residential mix. Notwithstanding that affordable accommodation is</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>something worthy of consideration, any development of this scale should be discussed with the community, understanding their needs before drawing up plans to destroy our environment.</p> <p>I am an advocate for improving a neighbourhood, and good planning could achieve this for West Norwood. However this is not what has been put forward.</p> <p>I struggle to understand how either of these could be considered for development and can only hope that the council has this clarity of vision also.</p>	
Individual	R0320	Other	<p>I object to the planning proposals for Site 18 and Site 19</p> <p>It will the character of the local area</p> <p>Site not viable for affordable housing</p> <p>Increased pressure on local services - where are the proposals for extra GP services, school places and Community Spaces</p> <p>Reduced air quality</p> <p>Businesses to close and local jobs lost</p> <p>Destruction of wildlife and trees with TPOs</p> <p>Loss of ancient light, amenity and destroyed visual skyline for residents</p> <p>I do not wish you to go ahead with the proposals for Site 18 and Site 19 for the above reasons. I demand that any new plans are developed together with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0322	Other	<p>Please this is ridiculous we need more time</p> <p>I hope you will listen to us locals</p> <p>Please remove these 2 sites from your proposal. It will be the ruin of west norwood area where I have lived for 30 years</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0323	Other	<p>We [redacted] and [redacted] of Flat 1/36 Chancellor Grove. SE21 8EG, are Opposed to the construction of site 18</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0325	Other	<p>I object to the proposals for this development. There has been no adequate public consultation, the proposals are totally out of character with the local area, not compatible with the Net-Zero target, not compliant with Lambeth's planning policy, and apparently not viable for affordable housing, and involve loss of amenity for local residents.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0329	Other	<p>We are appalled by these proposals which will destroy the character of the local area , increase pressure on local services, destroy wildlife and trees, create a 22 storey eyesore with loss of light and amenity.</p> <p>We demand that these proposals for site 19 and site 18 are removed from the consultation and that new plans are developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0330	Other	<p>I have been made aware of a huge development very close to me.</p> <p>Already we are struggling with traffic at certain times of the day due to schooling etc. Side roads are congested. I strongly would prefer for this</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			to not go ahead, if my opinion counts. I am a local resident and already forsee issues.	
Individual	R0331	Other	<p>We have been informed of the development plans for sites 18 and 19 around West Norwood. Our main concern is the maximum building height of the development and in particular the plan for a 11-storey building in Site 18 and a 22-storey building in Site 19. We believe that these large buildings would be detrimental to the local ecosystem (density of housing) and generally at odds with the typical maximum heights of buildings nearby. A more sensible maximum height for new developments should be in line with existing buildings' maximum height (typically 5-6 storey from what we see). While new developments in these two sites are generally welcome, replacing older buildings and vacant sites, we urge Lambeth to take into account residents' views and sensitivity. As part of the new development, we consider that care should be given to the following criteria: proportion of affordable housing, street and underground parking spaces, additional road traffic expected and impact on noise and air quality, cycle lanes, pedestrian areas, impact on local businesses and shopping for local residents, number of trees and areas for additional parks/recreation in green spaces, impact on train and bus requirements, and impact on visual skyline. While Lambeth might have taken some or all of the above into account, we ask that the development plans are modified to meet stricter conditions.</p> <p>As they stand, the plans for Site 18 and Site 19 are not acceptable to us and we need to object to their development.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0332	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0335	Other	<p>I am writing to express my objection to the proposed development plans for site 18 and site 19 in West Norwood.</p> <p>These proposals will decimate the heart of this tight knit community, without any meaningful consultation with the residents themselves. Our beloved highstreet, lower density housing and well established local businesses will be cast out in favour of thousands of new dwellings which will dwarf local services, ruin our skyline, put pressure on local schools and an already crippled local transport system. I strongly urge you to halt plans and consult properly with the community on all plans.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0337	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0338	Other	I am writing to you today concerning the lack of consultation to Site 18 & Site 19. Due to this lack of clarity, I wish it to be known that I oppose these sites and wish for them to be removed.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0339	Other	I am writing to you today concerning the lack of consultation to Site 18 & Site 19. Due to this lack of clarity, I wish it to be known that I oppose these sites and wish for them to be removed.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0340	Other	<p>I am writing to object to the proposed development sites (Sites 18 and 19) in Lambeth's SADPD</p> <p>The proposed heights of the buildings are not in keeping with the area and would create an eyesore for the whole community.</p> <p>I do not understand a justification for affordable homes (which is a loose term for homes still out of reach for many growing up in the area) which entails demolishing existing homes.</p> <p>The proposed sites and plans would have a massive detrimental effect on the local community - already struggling from years of disruption by Thames Water. Demolishing many small businesses along with family homes is unacceptable for an area that has seen under-investment for decades.</p> <p>A proper, consulted plan that serves the local community while making best use of under- utilised space would be welcomed - but the proposals on this plan are ill thought out and destined to negatively impact the established local community for years.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0341	Other	<p>We have been informed of some monster development and mega blocks building proposals on our doorstep.</p> <p>Our family of five live in [address redacted] since 2016.</p> <p>We moved here from Streatham Common North because we love the strong community feeling and the character of the local area. We shop local, our kids go to local schools, they go to the cinema and local shops safely on their own and we meet regularly friends at local businesses.</p> <p>The plan will destroy the character of the local area which our community is so proud of.</p> <p>Please help us preserve the local character, the local jobs, keep our vision to build a town center fit for 2050 and meet our net-zero target by 2030 by removing the proposals for site18 & site19 from this consultation.</p> <p>We trust Lambeth will look at new plans developed with the local community instead.</p> <p>Thanks for taking into consideration our appeal to object to this developments.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0342	Other	I am a local resident and demand that site 18 and 19 be removed from the consultation and that new agreed plans are developed with the local	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			community. I object for many reasons especially traffic chaos and reduced air quality and the destruction of wildlife.	
Individual	R0344	Other	<p>I wish to object to the proposals to erect 4 tower blocks between Lansdowne Hill and York Hill.</p> <p>I believe the highest will be 22 storeys, which will dominate the Norwood skyline and look completely out of place.</p> <p>I've lived in West Norwood for 11 years now, moving from West Dulwich, when Norwood was considered a downmarket area, and some parts of it very tatty, rundown and unsafe at night.</p> <p>In the following years it has been transformed into a lively , buzzy area, with better shops and independent restaurants and bars.</p> <p>The monthly Feast has really put Norwood on the map, and made it an area young professional people aspire to live in.</p> <p>We have some of the best, if not the best, transport links in the Borough.</p> <p>Croydon is a horrible example of the mishmash of styles that comes about when anyone can build whatever they like, in any style, and any height.</p> <p>It feels alien and unwelcoming in the day time and quite unpleasant by night.</p> <p>Who in their right mind would choose to live there when they could live in an area with buildings and streets developed with care and to a human scale?</p> <p>Of course we need more housing, but please don't let developers' greed ruin our town!</p> <p>So please reconsider this plan, and put forward a new one, that residents can get behind and approve.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0345	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p> <p>I am very concerned about the proposals for knocking down half of WN High St and building flats. The high street has become a great addition to all of the residents of west Norwood, it's a fantastic high street with shops and cafes and this development would ruin the area.</p> <p>This cannot happen here and I'm disappointed this has come back again after we opposed the previous site.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0346	Other	<p>We are writing to express our concern about Site 18 and Site 19 on the SAPDP covering West Norwood and Tulse Hill. We think the plans for these sites should be withdrawn and new plans developed involving the local community.</p> <p>First, today is 20 February. We have only learned yesterday of these plans</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>- but the deadline to comment is 22 February, hardly any time at all to examine the proposals. These plans are so large and far-reaching that more publicity should have been given to local residents, and more time should have been allowed for a proper consultation. If the intention is to build a new town centre for West Norwood then the community should be closely involved in all stages of development.</p> <p>A number of other concerns include:</p> <ol style="list-style-type: none"> 1. these developments would destroy the character of West Norwood (both Sites are primarily in West Norwood) without any obvious net gain for the local communities. Instead, local businesses will be threatened as will some local homes. Residents of neighbouring properties, not to mention the whole of the West Norwood / Tulse Hill area will have to suffer years of disruption. 2. The proposals include building exceptionally tall buildings for this part of London - another way in which they would be out of character with the area. 3. Site 18 in particular will have a massive impact on local amenities and businesses likely to force residents to travel further for basic shopping, and to use their cars more, having a negative impact on the environment. If the intention is to build a new town centre for West Norwood, then the community should be closely involved in all stages of the development. 4. It's not clear how this development sits in relation to Lambeth's net zero targets (for 2030) - clearly demolition and building work, and the traffic associated with that, will greatly increase the carbon output of Lambeth. 5. We probably do need more housing - but this should be affordable housing. We should not have a repetition of the situation in Elephant and Castle (and other places around London) where the very people who need housing in the area will be unable to afford it, but it will be accessible to rich people to move in. 6. The short-term disruption for residents (during building) will be compounded by longer term disruption due to the permanent loss of light and privacy from the unusually tall tower blocks that will dominate both projects. 7. What will the impact of such a development be on local amenities? Norwood Road is often a traffic jam during the rush hour at present - this is likely to worsen during construction, and afterwards (with the much larger population of the area). 	
Individual	R0347	Other	I am a local resident in SE27 (on Robson Road) and I, along with my neighbours strongly oppose the proposal for the new tower block development on our doorstep.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>These are enormous, ugly tower blocks that will destroy the character of the local area, are wildly out of keeping with the architecture in place and will bring with it a reduction in air quality, less parking and more traffic on what is an already busy area.</p> <p>There will be an impact on local wildlife and the skyline will take away natural light.</p> <p>Please listen to the residents of this area - there has not been enough consultation.</p>	
Individual	R0349	Other	<p>These proposals are outrageous. They show a complete lack of thought and care for our part of the borough. They are out of scale with their surroundings and pay no care or attention to the existing suburban architecture and heritage. There are no guarantees as to the quality of any accommodation added to our local stock nor to whether the quantity will even equal let alone exceed what is currently occupied by lower rent and social tenants. There is also scant or no attention paid to the environment and to the environmental conditions in which the thousands of additional residents of our part of Norwood would be forced to live. Nor to the existing lack of facilities ; doctor's surgeries, dental services, children's play areas, schools, parks, public transport etc. The additional number of residents will add to the pressures under which we already live. Any additional housing should be planned with care and sensitivity and should engage the existing residents. These appalling plans have been ' bounced ' on us with no notice and very little time allowed for responses. You must go back to the drawing board.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0350	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0351	Other	<p>I am writing concerning my objection to Sites 18 and 19 propsoed for West Norwwod.</p> <p>West Norwwod is a quite normal local shopping area which the building of sites 18 and 19 would change forever. They will completely ruin the area making it feel like another 'Croydon' which I and many local people are against.</p> <p>I would ask the planning committe to please reject the planning application for sites 18 and 19.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0352	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0354	Other	<p>What terrible plans for Knolly's Road and those for Norwood Road. You are ruining our neighbourhood. The roads are already congested and the air quality appalling. Are you sure you need all these high rise</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>blocks? I thought people were moving out of London, the birth rate is dropping and there are all those empty flats along the Thames. You do not give a toss about the environment, aesthetics or green spaces. Nor about residents in these areas.</p> <p>Needless to add, I am objecting to all your schemes for Knolly's Road and Norwood Road.</p>	
Individual	R0356	Other	<p>I write to:</p> <p>1). Request that the allocation proposals for Sites 18 and 19 be removed from the Lambeth Site Allocation Development Plans Draft and from the consultation. I am not opposed to development in general but the proposals for these two sites are entirely inappropriate and have involved no adequate engagement with the communities affected. In the absence of such prior engagement, it is inappropriate to consult on the proposals.</p> <p>2). To comment on each proposal in response to the consultation (however inappropriate I believe the consultation to be).</p> <p>Site 18</p> <ul style="list-style-type: none"> • The proposed massive development, extraordinarily out of scale with the rest of the neighbourhood, would bring substantial and detrimental change to the local communities. The detriment would arise both through a prolonged period of construction, with its inescapable disruptions, and from the impact of the finished development. • The proposal will produce uninspiring 'developer architecture' out of tune with the area. What would be more appropriate would be ambitious incremental development arrived at by engaging the community as an equal partner town centre redesign. • It seems to me that incremental development (within an outline Master Plan) is the only reasonable way forward. It would enable the development to reflect the way people locally actually live their lives, their aspirations and the changes they want to see to support those aspirations. • In that context it is important to recognise that COVID-19 has brought substantial change that is likely to have a long-term transformative effect on working patterns and the balance between time spent in home neighbourhoods and elsewhere and in the way people expect to use their homes. None of this can have been properly considered in arriving at the Site 18 proposals (it is much too soon to know clearly how change will play out). • West Norwood is already a viable, successful, neighbourhood with an enviable strong sense of community. There is lots of evidence for that sense of community but examples include the regular Feast, or the powerful response to proposals for redrawing the Parliamentary 	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>constituency boundary.</p> <ul style="list-style-type: none"> • Of course, the community needs and would benefit from investment, so long as investment proposals are developed with the community as a partner. • West Norwood's 'high street', which includes Norwood Road from Tulse Hill and Knights Hill up to the bus garage, has many independent retailers, with low vacancy rates, and has proven resilience backed up by statistics. Several new independent businesses have started up despite the pandemic. • The strength with which local businesses have emerged from the pandemic is part of a delicate balance requiring sensitive not broad brush stroke development. • Clearly there is desperate need for new, mixed accommodation for local people at affordable rents – but not at any cost. We want to see local homes for local people – designed in collaboration with local people. The proposed developments seem unlikely to deliver on genuine • West Norwood's strong local identity blends independent business with residential accommodation in heart of our community. This is enviable and has arisen organically. Nothing in the site 18 development proposals puts sufficient value on the sense of place that already exists. • I want to emphasise also, that I do not have a rose tinted view of what the neighbourhood needs. Several recent start up businesses are coffee shops or similar. I welcome them. But West Norwood also has thriving 'dirty' businesses - e.g. scaffolding companies and car repair workshops. These too are a core and essential part of our community helping to make Norwood a 15min Neighbourhood. • I should add that B&Q is an anchor store in West Norwood, another reason we can call ourselves a 15min Neighbourhood, I can see no specific proposals to retain this important business along with its essential parking - that is also an important asset for the rest of the shopping area. 	
Individual	R0357	Other	<p>I am a long-time resident of West Norwood and a member of the Norwood Forum Committee. I am aware of the development plan that the Council is compiling for the Borough. In respect of Site 18, I would like to ask that it is removed from the current consultation in order to provide more time for input from the local community. We will have many good ideas for the redevelopment of our high street.</p> <p>I personally want to see more social housing for local people and I would want to see local independent shops able to remain.</p> <p>Every encouragement with you deliberations.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0358	Other	<p>My wife and I have lived in and around West Norwood for more than 35 years.</p> <p>We are writing to voice the strongest possible objections to the proposals for these two sites. They are of a scale that is out of all proportion to the surrounding neighbourhood, particularly the proposed high rise buildings, and they would result in a fundamental change to the nature of the area and unsustainable pressure on already over-stretched local services and amenities.</p> <p>We trust they will be roundly rejected.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0361	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>Along with many others in our community I feel that the plans for Sites 18 and 19 in West Norwood and Tulse Hill are far from suitable for the area and support their removal from the planning process and replacement with a genuine consultation with the community in order to create something more carefully considered and in keeping with our needs.</p> <p>While the site 18 plan may include more affordable homes the proposed large buildings on Norwood Road between Lansdowne Hill and York Hill will overshadow the main shopping area which has been so much improved recently and our treasured local businesses may not survive the uncertainty the building works would create. We want our local independent traders to be given every opportunity to thrive and grow.</p> <p>I have been resident in the area since 1990 and have seen changes recently which have improved the general quality of life in the area while retaining its unique character. My children have grown up here and if they are to bring the skills and energy they have worked so hard to develop back to the community they love there needs to be a better solution than this.</p> <p>West Norwood and Tulse Hill are wonderful places with history and a new vibrancy to offer residents new and old. I urge you to listen to those who are asking for more time and thought to be given to producing plans which are right for the area and the people who live here and love it.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0362	Other	<p>I am emailing to ask that you consider removing proposals for sites 18 and 19 from the Lambeth draft site allocation development plan.</p> <p>These are the two sites in West Norwood.</p> <p>I only became aware of Lambeth's plans for West Norwood yesterday and as a resident of West Norwood for 25 years I was shocked and saddened to see the extent of the proposals.</p> <p>The size of the developments and the demolition of commercial</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			properties on the high street site 18 indicate a lack of understanding or consideration for the residents of the area. Whilst I am not opposed to the two sites being developed the current proposals could potentially destroy the fabricate and communicate of West Norwood. I urge you to re-think these proposals	
Individual	R0364	Other	The proposals for site 18 and site 19 are completely out of keeping with the local area, will put strain on local infrastructure and not benefit the community. They will destroy view lines, businesses, and the local character without adding affordable housing. They don't tie in to existing plans and targets for the community and for the area and should be removed from the current proposal. Plans for these sites need to be developed together with our community for the benefit of all.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0366	Other	We are writing to object to the monster development planned for site 18 and site 19. These plans should be scrapped, removed from this consultation and new plans developed with the local community. The proposed buildings would destroy the character of the local area – including some small businesses – and increase pressure on local services. We do not believe that there has been adequate public consultation about these plans.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0368	Other	I have lived in West Norwood for over 15years.Why do you always put profit over people's lives.How dare you come to such a beautiful area and choose to spoil it just because you can.I have disabled son who will only walk around this area because everyone knows everyone.I am a disabled person also and rely on these business's that you are planning to destroy.Things are tough already for people use the money your going to spend on these unnecessary buildings to fix the thousands of homes that are in disrepair.Making money isn't always the right thing,what about the job losses and homes.why are people so wicked and money loving you dont give a dam about the people its all about ruining people's lives until you need or vote.I am so sick of the lack of care and sympathy you have for the ordinary people.I hope you all sleep good at night.May GOD have MERCY on ALL of you. From someone who cares.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0369	Other	I am a concerned resident of Lambeth, specifically of West Norwood, and I strongly oppose sites 18 and 19. No other Lambeth town centre is to be affected in the same way by these development plans, and the way in which it is to be affected is unacceptable. The loss of local businesses, such as the B&Q and Knowles of Norwood for instance, will greatly impact anyone's desire to live in the area. I'm proud of the town center I call home and a big part	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>of that is the town center itself. The proposed plan would utterly annihilate the West Norwood I've fallen in love with.</p> <p>On top of this, I resent the idea of becoming home to the tallest building in Lambeth south of Vauxhall. The loss of natural light and visual skyline for the current local residents is one thing, however, I believe it even violates Lambeth's own planning rules to put in an eleven story building in the proposed location.</p> <p>I demand that sites 18 and 19 be removed from this consultation immediately.</p> <p>I wish you a lovely day and urge you to do the responsible thing,</p>	
Individual	R0370	Other	<p>I would like to register strong objections to the proposals for Site 18 in Norwood Road.</p> <p>1) The site certainly needs to be developed but needs to be developed in a way that does not completely destroy the character and value of the existing buildings and businesses.</p> <p>2) The area does need more housing but these blocks are ugly and too dense. Fewer units and a sensitive redesign of the site could both increase the housing stock and produce much needed facilities and opportunities for business growth.</p> <p>3) The consultation period has been far too short and has involved no community input. This is not the way to develop an area.</p> <p>4) The proposals would alter totally the character of West Norwood. This is a vibrant community but has only become so after a lot of effort on the part of various local bodies. It is becoming more cohesive only gradually and these proposals would totally destroy all the progress that has been made.</p> <p>5) The existing shops are a varied and valuable resource to the people of West Norwood and would be much missed. The organic growth and development of these businesses in response to local needs can never be replicated by building an entire new shopping centre. Of particular local value are B and Q, Iceland, Home Wares, Woodfalls opticians. and Knowles pub. These would not be replaced.</p> <p>6) The scale of the developments is huge and would completely overwhelm the already busy high street. The road is already often jammed with traffic.</p> <p>I urge you to reconsider these developments</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0371	Other	<p>I write as a local resident to object to the proposals for Sites 18 and 19 in West Norwood.</p> <p>While I am supportive of the need for regeneration of the area and the provision of more affordable housing, the proposed developments seem to achieve neither. They have also not been developed with adequate community consultation. The resulting plans would create undesirable</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>high rise blocks that would blight the area and have negative impacts on established and resilient local businesses on Norwood Road. It would be good to see LBL change its approach to one consistent with the 2017 Masterplan - Moving Forward: A Collaborative Approach to Delivery. This would mean properly involving the community in planning and implementing the solutions. We need to provide for the existing businesses that form the character of West Norwood. And we need affordable homes for local people. There is little or nothing in the plans to ensure this.</p> <p>I urge you to remove these site proposals from your SADPD.</p>	
Individual	R0372	Other	<p>I demand that the proposals for Site 18 and Site 19 are removed from consultation and that new plans are developed with the local community.</p> <p>I am appalled at the proposals and the potential impact on the local community including businesses.</p> <p>I and my immediate community strongly object to these proposals.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0373	Other	<p>. I am writing to express my alarm and objection to two large scale planning proposals named 'Site 19' at Tulse Hill and 'Site 18' at West Norwood.</p> <p>I am greatly concerned about the significant negative impacts on the life of the local community, on the character and feel of the area, on families, on the environment, on wildlife and the borough generally if this type of development is allowed to proceed. More specifically it will be:</p> <ul style="list-style-type: none"> • a monster development on a scale not ever seen in the area – to include the tallest building in Lambeth south of Vauxhall (68 meters / 22 storeys) – visible for miles; • destroy the character of the local area; • use a site that is not viable for affordable housing; • increase pressure on local services; • results in less parking, increased traffic and reduced air quality; • close businesses and end local jobs; • destroy wildlife including protected trees; • result in loss of light, amenity and visual skyline for residents. <p>I earnestly request the proposals for site 19 & and Site 18 be removed from this current consultation and new plans be developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0374	Other	<p>I would like to, together with my family request the plans to develop Site 18 & 19 are removed from the consultation process. We are residents of West Norwood have been since the 1990's and feel this would impact negatively on the local community.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0375	Other	I would like to express my strong support for the objections to the proposed developments on sites 18 and 19 made by Norwood Action Group (NAG). Whilst it is clear that investment and regeneration is required in West Norwood and Tulse Hill, it is vital that a carefully considered plan is developed in full consultation with local communities. The outcome should be one that regenerates and substantially improves the environment for local people and businesses, not one that comprises high rise, unappealing/ugly and high density developments. I therefore fully support NAG's and other community groups' demands for the removal of sites 18 and 19 from the plan and thereafter for fresh work in proper engagement with the community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0377	Other	I feel there are Huge problems with the development proposed . Takes all our local shops away Would need new provision for parking , schools amenities , GPs etc Building work in an overcrowded area for years Local homes and local businesses all ruined	Please refer to the general response to representations made by individuals and businesses.
Individual	R0378	Other	Please do NOT let this gargantuan eye-sore go ahead. We do NOT have the infra-structure, with schools, doctors etc., etc. You have already removed any easy parking on the High Street, which has really impacted on the local shops and businesses. Now you want to make it WORSE. I SAY "NO" but then you are known to never listen to the residents of the area!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0379	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. I strongly object to the proposals for Site 18 for the following reasons: It's inconsistent with the 2017 Local Plan and other policies; there has been little if any engagement with local residents and community organisations, the present consultation is short and low-profile and it's essentially being dumped on us. Demolition and redevelopment will cause massive disruption for many years with severe impacts from noise, dust, vehicle and machinery exhaust and traffic congestion. It will destroy the character of the area, eliminating all the shops on the west side, which you may think a bit untidy but which serve the community, and will almost certainly never be replaced by anything useful. Behind the presentational claptrap the proposals are for ugly and characterless apartment blocks a la Elephant and Castle, built solely for the benefit of developers and not affordable for local residents who	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			need better homes. The tower block is totally out of scale and again inconsistent with existing policies. In short the proposals would be a disaster in every respect and must not be allowed to go ahead.	
Individual	R0380	Other	<ul style="list-style-type: none"> • I would like to object to the current proposals for site 18 and 19 for the following reasons: Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • These are the only two sites with recommendations for tall buildings. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact • This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes: It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R0381	Other	<p>I am shocked to see on your website the suggestions for possible developments on these sites.</p> <p>Both seem to take no account of the area they are in or the people who live in this community. These ideas seem entirely based on maximising profits for developers which is not what local councils should focus on.</p> <p>Where is the local consultation? I cannot think of a single resident who would be in favour of either of these schemes. Please remember that this is a democracy and that you have been elected to represent us.</p> <p>You should have the best interest of the local community at the front of your minds. If you did, you would come up with something quite different.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0382	Other	I am horrified to learn about the proposed development on this high density plan. It will affect lots of local businesses, mount pressure on our services and destroy our area.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			I demand that this is removed from consultation and further plans are discussed with the local community	
Individual	R0384	Other	<p>I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community. I would like to object strongly to Lambeth's plan to destroy the character of Norwood High Street. As a long term resident of a road perpendicular to the east side of the high street I will be deeply affected by this development losing neighbourhood shops and watching the destruction of the low rise mixed architectural community feel of the area I love. My family and I enjoy the considerable amenity value of a high street with a great range of independent shops and household names such as Iceland and B&Q this would all be jeopardised during the 15 year development process. Ruining our lives and cutting the value of our homes without any proper consultation process. No other Lambeth town centre has been treated this way and the one hour consultation with the West Norwood Forum is laughably inadequate.</p> <p>The whole character of the plan for Site 18 is a major development that gives no consideration to what residents and stakeholders love and appreciate about the high street. The many trees, low rise buildings from a range of architectural periods, mixed businesses including garages, petrol stations and parking areas make this a 15 minute neighbourhood now rare in London. We love being able to get your car fixed, buy a mobile phone, a new kitchen in B&Q and fruit and vegetables then enjoy a drink outside in the garden at Knowles- all you need is at hand. It is clear that whoever drew up this draft plan had no understanding of the neighbourhood and what the high street means to nearby residential streets.</p> <p>In the draft plan for Site 18 and 19 there is no indication of architectural merit, sustainable values or guaranteed affordable housing or all the recent research that shows that families need low rise housing with gardens and local infrastructure. The last thing West Norwood needs is more empty high rise flats like the disaster that is the Vauxhall Cross development or the Westbury Estate plan that has minimal social housing and has displaced so many families destroying a close knit community.</p> <p>Lambeth should take note of the Neighbourhood planning assembly who are writing a Neighbourhood plan that consults with the West Norwood forum and groups that understand the community. As a long term resident I feel passionately that we should not have a developer led plans dumped on us as we already have a successful town centre with a great range of useful shops and an enviable community feel. This</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			community should be properly invited to be a partner in any developments which should enhance the character of our existing neighbourhood rather than suck its beating heart out. I look forward to receiving an acknowledgement of my objection	
Individual	R0385	Other	<p>As a local resident in Idmiston Road, West Norwood I strongly oppose what is being planned within Sites 18 and 19 and want to add my signature to those of others for it to be removed from this consultation for the following reasons supporting the views of Norwood Action Group.</p> <ul style="list-style-type: none"> • I am not commenting on detailed planning applications so issues of construction traffic, business disruption compensation, etc, whilst relevant in the longer term, are not quite so important now. • We must have the chance to review the substantial change this will bring to our neighbourhood and our way of life – the change to the heart of our community. • We don't want to see a swath of 'developer architecture', but an ambitious incremental development with the community as an equal partner in an exemplary approach to town centre redesign. • We believe that incremental development (within an outline Master Plan) is the only way forward as it enables the development to reflect change in the way we live our lives. • Nothing in these proposals reflects the changes that Covid-19 has brought to every aspect of our lives. • We expect world class urban design that recognises West Norwood as an existing viable, successful, neighbourhood with an enviable strong sense of community. • We welcome investment that sees the community as a partner. • Our 'high street' of independent retailers, with low vacancy rates, has proven resilience backed up by statistics. • Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development. • We recognise the desperate need for new, mixed accommodation for local people at affordable rents – but not at any cost. We want to see local homes for local people – designed in collaboration with local people. • We expect ambitious environmental credentials for any development. • We have a strong identity that blends independent business with residential accommodation in heart of our community. We have reached this enviable position organically and nothing in these development proposals puts sufficient value on the sense of place that already exists. • These proposals do not provide adequate provision for our existing 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>'dirty' businesses - e.g. scaffolding companies and car repair workshops. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood.</p> <ul style="list-style-type: none"> • B&Q is an anchor store in West Norwood, another reason we can call ourselves a 15min Neighbourhood, we can see no specific proposals to retain this important business along with its essential parking - that is also an important asset for the rest of the shopping area 	
Individual	R0388	Other	<p>We are residents of West Norwood and we demand the proposals for Site 18 and Site 19 are removed from this consultation and NEW PLANS developed with our local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0389	Other	<p>I am writing to express my opposition to the proposed developments in West Norwood. I am all for West Norwood developing but this is not the direction it should be taking. The blocks are far higher than they should be and will totally lose any character of the area and prevent West Norwood from developing in a much more sustainable, locals-first and aesthetic way.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0391	Other	<p>I believe that Site 18 and Site 19 should be removed from consultation, for the following reasons (list in not exhaustive);</p> <ul style="list-style-type: none"> • There is no reason for a high rise building in this area, when residential building in the area are no higher than 6 floors. This is against Lambeth's own policy. • A high rise, will not fit in with local scenery. Which make West Norwood and the surrounding areas, the beauty that they are. • The high street is the heart of the community and remove of this will impact the elderly, the vulnerable and the young. Local residents rely on these. • Removal, will mean small and large business closures which are well used. • Also this will go against Lambeth plan to cut pollution as now everyone will have to travel further to shop than to shop locally. Currently a lot of locals walk to the local shops. • Removal of part of the high street, will mean that redundancies for local residents and far reaching. • Both Site 18 and Site 19, does not provide enough green sites, and space internally. It seems the proposal is more about how much that we can fit in, than quality of life. • I would have expected to world class urban design that recognises West Norwood as an existing architecture, successful neighbourhood with an enviable strong sense of community and build on this. But the proposal, wishes to remove this. • Our 'high street' of independent retailers, with low vacancy rates, has proven resilience backed up by statistics. 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<ul style="list-style-type: none"> Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development. I understand the need for new, mixed accommodation for local people at affordable rents – but not at any cost and the detriment to the community. We want to see local homes for local people – designed in collaboration with local people. We have a strong identity that blends independent business with residential accommodation in heart of our community. We have reached this enviable position organically and nothing in these development proposals puts sufficient value on the sense of place that already exists. These proposals do not provide adequate provision for our existing 'dirty' businesses - e.g. scaffolding companies and car repair workshops. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood. B&Q is an anchor store in West Norwood, another reason we can call ourselves a 15min Neighbourhood, we can see no specific proposals to retain this important business along with its essential parking - that is also an important asset for the rest of the shopping area <p>I hope you take my comments into consideration, when reviewing the planning application and remove Site 18 & 19 from the application.</p>	
Individual	R0392	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0394	Other	<p>I am writing strongly to object to Lambeth's proposals for Site 18 and 19. For the following reasons:</p> <p>No adequate public consultation</p> <p>The hideous plans will destroy the character of the area.</p> <p>The plan threatens local homes and businesses</p> <p>There is nothing in the proposal about Lambeth's Net-Zero target for 2030</p> <p>There is no vision for a town centre fit for 2050 and beyond.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0395	Other	<p>I am writing to support the removal of Site 18 and Site 19 in West Norwood for the following reasons:</p> <p>Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth.</p> <p>No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this.</p> <p>These are the only two sites with recommendations for tall buildings.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact. This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation.</p> <p>As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes:</p> <p>It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area.</p> <p>The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years.</p> <p>The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.</p> <p>I am therefore keen to register my objection to sites 18 and 19 from the current development plan.</p>	
Individual	R0396	Other	<p>I am a resident of West Norwood and I demand that the proposals of site 18 and site 19 are removed from this consultation and new plans developed with input from the local community.</p> <p>Since moving to West Norwood 8 years ago the high street has developed with individual local business and site 18 will have a detrimental effect on these not to mention be an issue and cause huge traffic issues.</p> <p>There is no consideration for additional school places and parking that would be required if these plans go ahead in an already over populated area where not all school children in Lambeth can be taught in Lambeth due to lack of provision.</p> <p>I demand site 18 and site 19 are removed from this consultation. I would also like to be informed when the next meeting to discuss this is organised.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0398	Other	<p>I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0399	Other	<p>I have lived in this area for 60 years and this is the worst bit of planning I've ever seen and that's saying something.</p> <p>22 storeys is much too tall for such a densely populated area. The whole development will make the area too crowded.</p> <p>I hope you will consider Lambeth residents when you make your decision.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0400	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. The notion that it has been steamrolled through in this way is just madness	Please refer to the general response to representations made by individuals and businesses.
Individual	R0401	Other	I am a resident of West Norwood, living here with my family including 2 young children, who I plan to raise in the area. I am really disappointed with the lack of proper consultation on site 18 and 19 and think they should be removed from the current proposals, and new plans developed in partnership with the community. As they stand, the proposals would have a huge impact on everyone living and working here, so it is vital that the community is part of the process.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0402	Other	I object to these plants	Please refer to the general response to representations made by individuals and businesses.
Individual	R0403	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0404	Other	I am writing to object to the plans for Site 18 and Site 19 and ask that these sites are removed from the consultation and new plans developed with the local community. I am horrified to see such an ill considered plan for Site 18 where I live nearby. The plans show no consideration for the character of the local area. Having recently moved to this area we have been loving the charm of the High Street. Why homogenise it? The wonderful local homes and businesses will be threatened and there is no vision for a town centre for the future. I have also not heard of any public consultation. Thank you for your consideration - I really hope they are removed and a development can be designed that keeps most people happy.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0405	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0406	Other	I am a long time resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new viable and less destructive plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0407	Other	I object to these plans	Please refer to the general response to representations made by individuals and businesses.
Individual	R0408	Other	I'm writing to register my objection to the current plans for site 18 and 19. Whilst I am pro developing more housing and also pro the regeneration of the area and the opportunities this could afford many, the site plans themselves show a distinct lack of thought and ambition.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Building high rises is a lazy answer to housing problems, and would be a stain on West Norwood and the council. I urge the council to consult with residents and the community on mutually agreeable plans to achieve the objectives we are all working towards, without blighting the area with eye sores. Be more innovative than this.	
Individual	R0409	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0411	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. The heritage of the centre of our community will be lost forever. There is no need to destroy the high street just for profit via housing. There is plenty of housing already in West Norwood and this development will be a horrendous blight on the community. Remove the proposals now as our community does not want or need this.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0412	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community. The new plans should adhere to your own planning guidelines, which these do not.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0415	Other	Hi, I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0416	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0418	Other	I would like to ensure there has been consultation with all residents in the local area. Have residents and community groups been consulted. Have green issues been considered in traffic and environmental impact. Do residents have a voice in this ?	Please refer to the general response to representations made by individuals and businesses.
Individual	R0419	Other	I am a resident of West Norwood and have been for the past 40 years. I am very disturbed by the plans proposed as they will totally change the nature of area. The loss of the commercial properties which are so well established and used would be devastating. I demand the proposals for Site 18 and 19 are removed from this consultation and new plans developed with the local community. I understand the need to provide more housing but other services must also be supplied alongside additional accommodation on the scale proposed.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0420	Other	I am a resident of West Norwood and I demand that the proposals for Site 18 and Site 19 be removed from this consultation and new plans developed within the community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0422	Other	I am a resident of West Norwood and I demand that the proposals for Site 18 and Site 19 are removed from this consultation and that new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0423	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community Following on from my request to have Site 18 and Site 19 removed from consultation until new plans are drawn up I ask you to include advise from the London Wildlife Trust with regard to trying to save and encourage our dwindling wildlife AND bear in mind with the rising energy costs it might be a time to return to hanging washing out on versndas to dry - ie. Give the residents in these flats space. Not everyone can afford to run tumble dryers any more	Please refer to the general response to representations made by individuals and businesses.
Individual	R0424	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans are developed in consultation with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0425	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0426	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0427	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0428	Other	I am emailing to express my profound concern over Lambeth council's proposals for Site 18 & 19 in West Norwood/Tulse Hill. As a resident of West Norwood, I am asking for these proposals to be removed from the draft, as I and many others believe this will have profound and far-reaching negative consequences for the local community. I don't disagree that this area could be invested in, but the current plans would absolutely decimate the town centre and the lack of public consultation suggests to me that you either already know this, or do not care. More affordable housing is of course needed, but this absolutely has to be in line with the local community - we do not need more of the same. I urge you to rethink your plans and I do not doubt that you will have a massive pushback from the communities of West Norwood and Tulse Hill should you progress with the plans in their current form.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0430	Other	<p>I am a West Norwood resident and I demand the proposals for site 18 and site 19 are removed from this consultation and new plans developed with the local community. I'm utterly baffled and outraged about the plans to build such a ridiculous number of extra homes in the heart of West Norwood. There are already far too many people packed into this area and the idea of stuffing 500 new homes in such a small area is horrifying!!!</p> <p>Moreover, building a 12 storey high building in this area is insanity! West Norwood is a low rise neighbourhood and this kind of giant block would be an ugly blight on the landscape.</p> <p>I have truly never heard such a ludicrous plan and should this go ahead I will be casting my next vote elsewhere.</p> <p>I have not met a single resident in West Norwood who thinks this plan is a good idea Not a single one! Please tell me the benefit to the local community of this plan. Personally I can see none, so I am genuinely curious about what the reasons are for suggesting this.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0431	Other	<p>I am emailing to object to the proposal of sites 18 and 19 being built in West Norwood.</p> <p>This is on the grounds it will impact the appeal of the high street and effect businesses.</p> <p>Looming over our street, there are other sites more suited to such a high structure.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0432	Other	I am a resident of West Norwood and I demand that the proposals for Site 18 and Site 19 are removed from consultation and that new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0433	Other	I am a resident of West Norwood and I demand that the proposals for Site18 and Site19 be removed from the present consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0434	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0437	Other	<p>I have lived in West Norwood for more than 30 years, and I am strongly opposed to your proposals for Site18 and Site19 development. They will severely disrupt our high street, bring years of chaos, and destroy businesses with decades of history in our neighbourhood.</p> <p>I hereby demand that these plans are removed from this consultation and that new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0439	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from the current consultation on Lambeth and new plans developed with the input of the local community.</p> <p>These plans will seriously compromise the local area and current residents as well as have a detrimental effect on our high street.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0441	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0442	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0444	Other	<p>I am writing to object to the proposed developments for sites 18 and 19 in West Norwood. Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill. The current density of development in the area is for low to mid-rise buildings. These buildings are completely out of kilter with the local area. Additionally, there is already significant congestion in the local area and the high rise developments will add more cars to the roads. There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact. As a local resident ([address redacted]) I'm keen to see more housing in the area, but housing that fits the local needs and architecture - high rise does not do that.</p> <p>I also believe that any proposed development should have a high percentage of affordable housing, and I hope that the Council will ensure that any development meets the Mayor of London and the London Plan's target of 50% affordable housing.</p> <p>The Council should also ensure a high quality of architecture for any proposed developments. There's good quality housing stock in the area and any new developments should match this for the benefit of the new residents and the local community.</p> <p>I look forward to following discussions and I hope that the Council will take local residents concerns into account.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0445	Other	I have lived in West Norwood for 40 years and the lack of adequate consultation on these building plans, which will dramatically change our neighbourhood, is disgraceful. The proposals for sites 18 and 19 must be withdrawn and new plans worked out in close cooperation with the local community. High-rise blocks are totally out of keeping with the area. Well established and valued shops would be ripped out of the heart of our high street and replaced with unimaginative, high density developments without the necessary amenities and services to support them. While affordable housing is needed, these plans are not the answer.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0447	Other	<p>No,no,no!!! Not needed and certain to cause chaos for years and for what? Not an improvement to our area. Do think again - that's if you "thought" in the first place!!</p> <p>Concerned long time resident.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0450	Other	I am a resident of West Norwood and it is with concern that I read about plans to redevelop the area around site 18 and 19... destroying numerous local businesses in the process, and with no adequate public consultation! Therefore I would like to demand that the proposals for site 18 and 19 be removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0453	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0454	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0456	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0457	Other	I hereby object to the planning of 18 and 19 going forward	Please refer to the general response to representations made by individuals and businesses.
Individual	R0460	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. I want to see the heritage features of the high street retained, green space created & removal of inappropriate high rise housing.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0462	Other	I am writing because the developments at site 18 and 19 (West Norwood) have come to my attention and as a local resident I am concerned. We have a unique and characterful high street here in West Norwood and although I appreciate more homes are needed I would like Lambeth to propose other plans that don't jeopardise so much of what we have. I would also like to see these plans developed in collaboration with the local community. I await your updates to let us know how this will be done.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0463	Other	I am a resident of West Norwood and I demand that the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0464	Other	I am alarmed to discover the plans to build huge tower blocks in and around West Norwood. From what I have seen of the plans, these sites would have a devastating impact on the high street and the surrounding areas. Developments of this scale cannot go ahead without full and proper consultation with the local community, and any new housing has to be truly affordable for people who earn the minimum and average wage. The sites must also conform with environmental regulations and Lambeth's net-zero target.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			I demand that these sites are removed from consultation and new plans are developed with the local community.	
Individual	R0465	Other	I am a West Norwood Resident and I demand that the proposals for site 18 and 19 are removed from this consultation and new plans are developed with the local community. Please listen to local people. These sites need individual local consideration for us to input as the people who live here - this is our neighbourhood and we should be carefully and properly consulted about plans of this scale!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0466	Other	I'm writing to support the West Norwood redevelopment plans, in spite of the campaign by the Station-to-Station Bid to reject the plans. The high street is polluted, dirty, tatty, uncared for rat run - the shops are poor quality and have suffered years of neglect. The sooner the garage, B&Q and chicken / kebab shops are gone, the better for everyone - our high street should be aspirational and in line with the rest of London. That said, the development needs to be much better than some of the rectangular blocks that have gone up in the area in recent years - high quality urban design is key here. I'd also implore the council to make provision for a segregated cycle lane along the high street as the road public realm is widened - it's a once in a generation chance to make this much needed move and is in line with government walking and cycling policy. I also hope the eye sore railway arches at the bottom of Auckland Hill / under the station can be regenerated soon too as they have in other areas like Herne Hill and Peckham - there's no reason West Norwood shouldn't enjoy the regenerative successes these areas have had in recent years.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0467	Other	I am a resident of West Norwood and I would like to request that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0468	Other	I am a resident of West Norwood and I demand that the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0469	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0470	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. The way it must be done.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0472	Other	I live in West Norwood and request site 18 & 19 proposals to be removed from the consultations and that open public discussions take place prior further planning proposals are made.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0473	Other	<p>As a new home owner in West Norwood, I strongly object to site 18 and 19.</p> <p>My reasons are:</p> <ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so believe that the consultation process must also be treated differently to reflect this. • Buildings this height are not fitting for this area • There is a strong community feel in the area and this will ruin it • I worry for local businesses • There is not available public transport for 	Please refer to the general response to representations made by individuals and businesses.
Individual	R0474	Other	<p>I have been a resident of West Norwood for 20 years. The proposal for the above sites would adversely effect the community and neighbourhood.</p> <p>There has not been adequate consultation with residents. The proposals for Site18 and Site19 need to be removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0475	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. The way it must be done. This email is to show my strong objection to the development plans proposed for site 18 & site 19</p> <p>In our view as home owners in Egremont Road, both are completely outside of any reasonable request for us as community</p> <p>Having recently bought in the area, I am deeply disappointed that this would even be considered - for Lambeth to be a place that attracts young families and new independent businesses (in a similar way to what happened in Clapham then Balham and now tooting) it is vital that the character of the area not be destroyed and these developments would absolutely do that. It is in lambeth councils best interest to maintain west Norwood as somewhere that people want to come and live long term</p> <p>Reasons as follows (non exhaustive) :</p> <ol style="list-style-type: none"> 1. Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth 2. There has been insufficient time to adequately engage the 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>community in understanding the proposals and their long term impact</p> <p>3. This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation.</p> <p>4. Destroys character of the local area</p> <p>5. Destroys all existing commercial presence on the high street</p> <p>6. False net zero target through very high density and No vision for a town centre</p> <p>7. No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this</p> <p>8. We believe that incremental development (within an outline Master Plan) is the only way forward as it enables the development to reflect change in the way we live our lives.</p> <p>Please do reach out should any further clarification is needed on the points highlighted above.</p>	
Individual	R0476	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 be removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0478	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0479	Other	<ul style="list-style-type: none"> • We want to see an ambitious incremental development with the community as an equal partner in an approach to the town centre redesign. • We believe that incremental development (within an outline Master Plan) is the only way forward as it enables the development to reflect change in the way we live our lives. • Nothing in these proposals reflects the changes that Covid-19 has brought to every aspect of our lives. • We expect a design that recognises West Norwood as an existing neighbourhood with a strong sense of community. • We welcome investment that sees the community as a partner. • Our 'high street' of independent retailers, with low vacancy rates, has proven resilience backed up by statistics. • Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not a blasé development. • We recognise the desperate need for new, mixed accommodation for local people at affordable rents – but not at any cost. We want to see local homes for local people – designed in collaboration with local people. • We have a strong identity that blends independent business with 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>residential accommodation in heart of our community. Nothing in these development proposals puts sufficient value on the sense of place that already exists.</p> <ul style="list-style-type: none"> • These proposals do not provide adequate provision for our existing 'dirty' businesses - e.g. scaffolding companies and car repair workshops. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood. • B&Q is a store of significant importance in West Norwood, another reason we can call ourselves a 15min Neighbourhood, we can see no specific proposals to retain this important business along with its essential parking - that is also an important asset for the rest of the shopping area. <p>Concerned local resident of 25 years</p>	
Individual	R0480	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0481	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0482	Other	<p>A call-out from Facebook and worth doing if you can, to try and prevent the developments proposed for West Norwood: 'Even if you have already sent in your response - could you manage one quick thing this evening - and that is to please email Lambeth with this single sentence: I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0483	Other	I am a resident of West Norwood and demand the proposals for sites 18 and 19 are removed immediately and new plans developed consulting the local community .I am horrified at what is currently being proposed .	Please refer to the general response to representations made by individuals and businesses.
Individual	R0485	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>The current plans are not in keeping with the needs of the community and will ruin the character of the high street. High rise blocks are not suitable in this area and would destroy the high Street. The current plans would put immense strain on existing public services in the area and do not serve current residents.</p> <p>As residents of West Norwood we deserve a consultation and plans which will enhance the local area.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0486	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0487	Other	I am a local of West Norwood and would like to register my objections as regards the above planned development, which I consider is unsuitable for the area and note has not been planned with the local community. Please halt any further development of these sites.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0488	Other	I am a resident of West Norwood and I demand the proposals for site 18 and 19 are removed from this consultation and that new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0489	Other	I am a resident of west Norwood. I moved to the area with my family because of the charm and character of the area. I have just been made aware of the proposed plans for site 18 & 19. I think this would be devastating to the area and the community. I am 100% for progression and investing in the area but works of this scale and the loss of so many commercial properties would be very damaging. I think plans of this scale should be made more common knowledge to local residents. This is the first I have heard of this.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0490	Other	I am a resident of west Norwood and I demand the proposals for site 18 and site 19 be removed from this consultation and new plans be developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0491	Other	I have just been sent the link to the proposed plans for Site 18 and 19. I cannot believe such damaging plans to a local community are being proposed. Retail in the area is only just starting to recover from the pandemic and now this will totally destroy it. I believe local residents should be made more aware of these proposed plans. This will have a monumental effect on the charm and community of West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0492	Other	I am utterly dismayed by the total lack of intelligent and considered thought displayed in the proposals for site 18 and 19 and strongly request that these are withdrawn and then replaced with new plans that are developed in consultation with the local community. The proposed plans on both sites would By the size and height be a blight on the landscape and destroy the character of the local area. Fail to provide the affordable housing they claim because of the unsuitability of the location and the cost that would be involved for example ..site 19 building bridges over railway for access. Many local businesses and jobs would be lost and others would be badly affected by many years of disruption. There is no thought for a town centre just a destruction of some of what currently exists. A loss of at least 80 current homes (site 18) plus the fact blocks of up to 22 storeys are totally unsuitable especially for families or the mental health of the occupants.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>There would be an unacceptable level of increased pressure on all local services such as schools, health services and transport.</p> <p>There would be a reduction in air quality and destruction of trees and wildlife at a time when one would expect an emphasis on improving current standards and quality.</p> <p>I would appreciate an acknowledgment that these objections have been recorded and considered. There must be better solutions to the housing needs.</p>	
Individual	R0493	Other	<p>I am a long time resident of W Norwood. I am disgusted by the proposals for Sites 18 and 19. I demand that new plans be proposed in concert with DISCUSSION WITH LOCAL RESIDENTS and COMMUNITY INVOLVEMENT.</p> <p>The plans are atrocious, out of place, out of keeping with the community, ugly, impractical and will cause huge disruption to the local community on many fronts. We are against this horrendous plan.</p> <p>I am part of a large number of WhatsApp neighbourhood groups encompassing Idmiston and Chatsworth Roads. EVERYONE is against the proposals.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0494	Other	<p>As a lifelong resident of west Norwood and invested in its regeneration, we demand the proposal for site 18 and 19 be removed from this consultation and new plans developed with support of the local community.</p> <p>The idea that a plan can be submitted involving land the submitters do not even own and including the buying of multiple highstreet shops against their will is entitled and outrageous. We in WN are all for improving the area but where are the provisions (schools, transport, parking, gps, supermarkets, nurseries) for the people who will be living in the new homes in the plan?</p> <p>Reconsider.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0495	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. This is not what this community needs, a more thoughtful and inclusive plan must be developed with respect to the local community. And these are the reasons below. This is our home and we've invested all of our savings into them, we demand that that is respected as you are in a contract with us due to the payment of local and national taxes which means that you have to respect our demands.</p> <ul style="list-style-type: none"> • We don't want to see a swath of 'developer architecture', but an ambitious incremental development with the community as an equal partner in an exemplary approach to town centre redesign. • We recognise the desperate need for new, mixed accommodation for 	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>local people at affordable rents – but not at any cost. We want to see local homes for local people – designed in collaboration with local people.</p> <ul style="list-style-type: none"> • We have a strong identity that blends independent business with residential accommodation in heart of our community. We have reached this enviable position organically and nothing in these development proposals puts sufficient value on the sense of place that already exists. • These proposals do not provide adequate provision for our existing 'dirty' businesses - e.g. scaffolding companies and car repair workshops. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood 	
Individual	R0496	Other	<p>I am writing to you to show my serious concerns on the way you are enforcing developments in our community without proper involvement with our local groups.</p> <p>I want to ensure change is carried in a constructive manner, with locals being involved. The impact in the community is being clearly assessed, public services are available for a large increase in the population of the area.</p> <p>Buildings are done thinking on the present services and shops we have, local marketing and artists, b&q, Iceland, uniform shop, repair car services. And do not forget parking!</p> <p>Buildings for affordable budgets are done at high standard and not at the cheap and procured to the lowest bid firms that will cause aesthetic disaster in the character of the area. And in the long term this bring sad communities, graffiti and so on.</p> <p>What about the environment are you planning in cutting more trees. I keep writing to Lambeth to plant new trees in the area were trees have been removed by Lambeth. If Lambeth cannot do this, how can we trust Lambeth with such a development!!!!</p> <p>I hope my views are taking into account as council tax payer,</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0498	Other	<p>A) I am objecting to Lambeth council's proposed construction of a mega development in West Norwood.</p> <p>B)I demand sute 18 and sute 19 are removed from this consultation and new plans are developed with the community.</p> <p>C) Obejection reasons, but not limited to the following</p> <ol style="list-style-type: none"> 1. No adequate public consultation 2. Destroys the character of the local area 3. Threatens local homes and businesses 4. Site not viable for affordable housing 5. Increased pressure on local services 6. Less parking, traffic chaos and reduced air quality 7. Business to close and local jobs lost 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>8. Distraction of wildlife and specially protected trees</p> <p>9. Nothing about Lambeth NetZero for 2030</p> <p>10. No vision for a town centre fit for 2050 and beyond</p> <p>11. SITE 18 and 19 should be removed</p> <p>12. Monster development - 68 meters / 22 storey high</p> <p>13. Tallest building in Lambeth south of Vauxhall - visible for miles?</p> <p>14. Loss of light amenity and visual skyline for residents</p> <p>It appears Lambeth is consulting on high density plan that would replace 25% of our town centre with huge blocks including an 11-storey tower breaking Lambeth's own planning rules. This is providing a blueprint for developers</p>	
Individual	R0500	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Mums for Lungs	R0501	Site Allocation Policy	<p>We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document.</p> <p>We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings.</p> <p>As acknowledged by Lambeth cabinet last November, "Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough." Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document.</p> <p>Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.</p>	<p>One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes'. These strategic overarching principles are also applicable to the SADPD PSV.</p> <p>The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy SI1. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.</p> <p>The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth's Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council's work.</p>
Mums for Lungs	R0501	Transport	<p>Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough.</p> <p>We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?</p>	Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Mums for Lungs	R0501	Transport	<p>In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.</p> <p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It's equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p> <p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth council so that they become a tangible, positive reality for everyone living and working in the borough.</p>	<p>In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking.</p> <p>Other London Plan policies will be applicable, such as Policy T1 'Strategic approach to transport', T2 'Healthy streets' and T5 'Cycling', that set the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.</p>
Individual	R0502	Other	<p>I have just seen the plans for West Norwood and was truly horrified. It will destroy the local community, its character and will turn a historic high street into an ugly concrete tower block. The road infrastructure and pollution is already terrible in the area and wouldn't be able to cope with this amount of extra buildings. I can't imagine the destruction it will do to the landscape or how much light it will take away from the area. It makes me incredibly sad that developers and the council think this is acceptable.</p> <p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>
Individual	R0503	Other	<p>I am a West Norwood resident and demand that the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.</p> <p>It really is beyond belief that Lambeth are yet again proposing plans which will be hugely to the detriment of residents in this area. Local councils should work for the benefit of the area and its residents, not actively for the ruination of its high street and with complete disregard to the negative effect on living standards in existing properties.</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Similar objections have already been raised in regard to the ludicrous proposal for an industrial plant on the Windsor Grove site.	
Individual	R0504	Other	I am a resident of West Norwood, [address redacted] I demand the proposals for site 18 and site 19 are removed from this consultation and new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0505	Other	I am a resident of West Norwood and I request that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0507	Other	I am a West Norwood resident living on Thurlestone Road. I've seen some proposals on facebook regarding 2 huge building developments proposed for West Norwood which are completely out of keeping with the local area. There appears to be no adequate consultation on the effects of these huge developments, and site 18 especially would destroy the character of West Norwood and the high street. Please remove these proposals from this consultation and develop new plans alongside the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0508	Other	I work in West Norwood and suggest that proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community; which seems a much better and inclusive way of working.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0511	Other	I am a resident of West Norwood and I strongly object to the plans for the redevelopment of these sites. They must be taken down and proper consultation with the community should happen. Do not impose your monstrous plans on us. West Norwood is not Lambeth Council's dumping ground. What on earth is this monstrosity that Lambeth Council is planning to inflict upon West Norwood? Where has this been publicised? Who on earth could imagine such a scheme to be transplanted onto a low rise suburban neighbourhood? Where is the consultation process that addresses the interests of the existing local population? Such a development would gridlock an already congested commercial centre. THIS MUST NOT GO AHEAD.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0512	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0513	Other	As a resident of West Norwood, I am writing to object to the proposals for Site 18 and Site 19 and to demand that the proposals are withdrawn and new plans are developed with the local community. The plans will break Lambeth's planning rules, destroy the character of	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			the local area, threaten local homes and businesses, and will not advance progress towards Lambeth's Net-Zero target for 2030.	
Individual	R0516	Other	I am a resident of West Norwood and I demand the proposals for site18 and site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0518	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0519	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. These plans, especially the Knollys Rd towers are ill considered and not in sympathy with the existing buildings in the area & will have a detrimental effect on the quality of life of the residents of West Norwood at large.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0520	Other	I am a local resident of West Norwood and I am really shocked to be hearing of the development plans proposed for the site 18 and 19. I believe that insufficient time has been given to consult with the community regarding developments that will dramatically impact the local area and our skyline. These are major developments that will impact the heart of west Norwood and tulse hill in a negative way and I do not think they are suitable for the area. I urge that the plans are revoked.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0521	Other	I am writing to request that these proposals are removed from the consultation- the community has not been engaged in developing these plans and the scale of the proposed developments is not appropriate for the residential area, 8 and 12 stories where other local developments are no higher than 4 stories. Please also take into account the following points: <ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • These are the only two sites with recommendations for tall buildings. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact 	Please refer to the general response to representations made by individuals and businesses.
Individual	R0524	Other	As residents of West Norwood for more than 50 years we are horrified by the proposals for Sites 18 and 19. We demand that the proposals for these two sites are removed from this consultation. We also demand	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			that new plans are developed with the FULL participation of the local community, taking into proper account the impact on all the local businesses and the chaos that will blight Norwood Road for many years. High rise blocks as proposed are totally unacceptable in the proposed areas.	
Individual	R0525	Other	<p>I am writing to you regarding proposed developments in West Norwood : site 18 and site 19.</p> <p>Both sites are likely to affect the character of West Norwood and put the residents through hell during the construction should it go forward. Numerous local business will be affected and probably even destroyed. The scope of the works probably means that the promises of affordable housing will never be fulfilled.</p> <p>And I don't even want to think about the extra traffic that will for sure generate in the future.</p> <p>I understand the consultation has not been opened to local communities and that this has been developed behind close doors.</p> <p>Supporting local communities group, I am calling you to:</p> <ul style="list-style-type: none"> • Go through a genuine consultation in developing a carefully considered plan • Consider investment and regeneration in West Norwood and Tulse Hill rather than disruptive planning of high rise building • Ensure that any plans of development benefit first to local families and not to investors and gentrifiers • Not disturb further our local businesses that went through a very difficult period • Ensure the conditions to keep the west norwood character, including a ever more vibrant local community <p>Looking forward to reading your answer</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0526	Other	<p>As a West Norwood resident living close to this proposed development I write to lodge my objection on the following grounds:</p> <p>Site 18</p> <p>This is a high density plan being put forward without adequate public consultation></p> <p>An 11 storey tower block is wholly inappropriate for this area. The character of the local area will be destroyed.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0527	Other	I object to these proposed developments, which would be totally out of character with the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0529	Other	I am a resident of West Norwood, and I am writing to object to the proposals for Site 18 and Site 19. While I am not against development of the area in principle, these specific proposals have been pushed through without adequate public consultation and threaten to destroy the character of the area.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			These proposals must be removed and new plans developed together with the local community and in line with a broader vision for the future development of the West Norwood town centre	
Individual	R0531	Other	<p>We the undersigned wish to collectively and individually object to the Draft Lambeth Site Allocations Development Plan Document (SADPD) on the following grounds. We strongly object to Site 18 and it should be struck from the Development Plan. It is not in keeping with the Lambeth Local Plan of no tall towers outside the South Circular.</p> <p>The SADPD is a poorly prepared document containing a number of errors of fact. It has the look and feel of a desk-based exercise with little checking of assumptions, or examination of the actual site and its surroundings. The SADPD appears to have chosen an approach that in other cities, in both the UK and overseas, has led to ghettoization and decline of an area. This is in stark contrast with work elsewhere in the borough, e.g. Windrush Square and central Brixton.</p> <p>Public consultation with local residents and organisations has been poor. We believe the SADPD to be inadequate for purpose and would support any move by the ward councillors or community groups to challenge it.</p> <p>scale of development</p> <p>The scale of development at Site 18 286–362 Norwood Road, is out of place and excessive in terms of the height of the buildings and the number of residential units. A tall tower is totally out of keeping with the surrounding area.</p> <p>A new review of future housing need in light of recent changes in work patterns should take place; and the SADPD should be delayed and then revised to reflect its findings.</p> <p>Going forward there will be less need for housing within the central London travel to work area. The recent conversion of office towers to residential use illustrates this.</p> <p>During the pandemic, some landlords were reducing rents on vacant premises by more than 10% as demand dropped when many of those furloughed, or working from home, moved away. Some will not return and overall housing requirements are likely to change.</p> <p>The growth in hybrid working and working from home, in the area, means that employment is best supported by an increase in outdoor open space rather than an increase in business premises. This supports existing local business, as home workers who use their lunch break to buy something to eat and to shop, do so locally rather than near a dedicated business location.</p> <p>The immediate area around that of this proposal, is seriously deficient in both open space and access to nature. Increasing the housing density</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			can only make this problem worse. Although the SADPD makes a token gesture towards new public space, this is minimal to say the least and would be overshadowed and dominated by a tall tower.	
Individual	R0531	Other	<p>Transport and Infrastructure</p> <p>The local roads in the vicinity are rats runs that regularly become congested due to the capacity limitations caused by high levels of street parking. Residential development on the scale proposed will only add to this problem as, inevitably, some residents of the proposed development will wish to own a vehicle, and park on nearby streets. The plan on page 106 of the SADPD shows a Healthy Route passing through the site on Norwood Road. The reality, as a simple site visit would have revealed, is that this does not exist. Not only is there no room to establish one, the SAPDP will not facilitate the creation of one in the future. This is confirmed on page 108 where it only refers to a Healthy Route on Norwood Road to the North of the site. Proposed Healthy Route development as part of the Site 18 proposal ignores some key travel desires / flows.</p> <p>The plan shows a service road running from York Hill to Lansdowne Hill. This will add further traffic to the already busy York Hill with possible queues back to the junction with Norwood Road. The area at the bottom of Lansdowne Hill is already a busy area with chaotic traffic flows where it joins Norwood Road. The sole reason for including this road appears to be an attempt to improve traffic flow on Norwood Road without addressing the more serious and fundamental contributing factors. One signatory to this objection is a cyclist and can confirm that Norwood Road in the Site 18 area is heavily congested; and that the only safe way to cycle along it is in the centre of the lane safely holding traffic back – as recommended in the Highway Code. This also makes it easier to avoid pedestrians forced to step into the road due to the critical mass of people on the pavement.</p> <p>The pushing back of the building line to widen the pavement will help meet existing demand. It will not provide a North South Healthy Route, or provide for the increased outdoor space required to support the ultra-high density housing levels proposed for the site, or the growth in retail development that West Norwood has the potential to support.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0531	Other	<p>Damage to West Norwood District Centre Retail and Employment</p> <p>If implemented, the proposed level of development of Site 18 will damage the retail and employment potential within the West Norwood District Centre. It will severely reduce the likelihood of it ever becoming a centre for 15-minute living.</p> <p>The existing B&Q store is the major retail space on Norwood Road. As such it is one of the key premises that bring people to the shopping</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>area and thereby helps unlock the potential of other retail outlets. The SADPD proposes the loss of this premise without any kind potential replacement.</p> <p>Recent studies of future shopping trends and town centre rejuvenation have consistently shown that, whether a large centre like Halifax or a local high street like West Norwood, a key premise like this is essential. As routine shopping has moved to being an on-line activity, the visit to local shops is becoming more of an 'experience' with greater social activity and interaction. This has also shown to be important in the success of 15-minute communities. This requires both indoor and outdoor space away from the road edge in which, for example, to mix, share a coffee, listen to a busker, or hold a business meeting with a fellow work-from-homer. Some of this space could be created by imaginative approaches such as roof top cafes with 'green' terraces. Shopping areas like this then become a destination with the footfall to support a healthy range of outlets including artisans, specialist traders and small businesses. This grows the local economy and provides increased employment. These facilities are also one of the key factors that digital / tech and other high value employers rate as essential when selecting areas in which to locate their businesses. This could be achieved on Site 18, but will be lost if the proposals in the SADPD are permitted.</p> <p>Typically, service roads such as that proposed for this site, create areas in which anti-social and criminal activity can take place.</p>	
Individual	R0531	Other	<p>Impact on the Environment</p> <p>London urban temperatures are typically 2°C higher than the surrounding areas. This Urban Heat Island (UHI) effect is due to the built environment absorbing more of the sun's energy than natural surfaces. The SADPD envisages buildings that will increase the thermal mass that absorbs heat through the day and radiates heat at night, significantly raising night time temperatures.</p> <p>These buildings potentially will also reflect sun into what would otherwise be shaded areas of neighbouring properties limiting cooler zones within those buildings increasing the likely use of air conditioning units with resulting increased energy spend and noise nuisance. For other properties it will cause shading and loss exposure to sun and natural warming. This will require additional energy use to compensate as will the loss of light, particularly at the start and end of day.</p> <p>On still warm days it is sometimes possible to taste the air pollution on Norwood Road. It is likely the London ULEZ zone will have a doughnut effect resulting in less polluting traffic in the area immediately surrounding it. The proposals for Site 18 will enclose Norwood Road</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>more making it likely that there will be increased stratification negating any ULEZ gain by trapping, at ground level, both polluted air, and the increased particulate emission from the tyres and brakes of electric vehicles.</p> <p>There will be the potential to increase the severity of the wind-tunnel effect when the wind blows along Norwood Road.</p> <p>The development proposed in the SADPD will be over powering and dominate the shopping area of Norwood Road making it a less desirable place in which to shop and do business.</p>	
Individual	R0533	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p> <p>I would like to STRONGLY OBJECT to the plan for this vast development in West Norwood on the following grounds:</p> <ol style="list-style-type: none"> 1. I've heard about this through the community not the council - there seems to have been no serious attempt to inform local residents and business and this plan appears to be being rushed through without proper scrutiny. There is no adequate public consultation. 2. This plans absolutely destroys the character of our local area, wiping out a whole section of our town centre with a huge impact on all local residents and business' and replacing it with a number of buildings which do not fit with the existing local landscape. 3. The proposal threatens people's businesses and homes. Many businesses' and livelihoods will be lost for good, many people will lose their jobs and our town centre will be destroyed forcing business outside of the area. 4. The tallest building towers over the existing local buildings and is not at all in keeping with the local lower rise neighbourhood. It also breaks Lambeth's own planning rules. 5. The buildings, particularly the tallest one, will impact daylight, sunlight and privacy for lots of local homes, thus wrecking residential amenity contrary to Lambeth and national planning policy. 6. Due to it's size, the building of this development will directly impact the noise levels for the local community for years...Hugely disrupting the lives of local residents. 7. This development will be years in the making, based on the last few years and the Thames Water works, the effect on the local community and business will be huge and footfall in remaining business' will be decreased thus threatening more livelihoods. 8. With the many proposed new homes comes an increase in cars, there will be a huge impact on parking, traffic and air quality. The local roads are already overcrowded with daily altercations, problems parking 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			and backed up traffic. There is also currently inadequate access to the site, further impacting the problems with local parking and traffic 9. There is no vision for a town centre that's fit for 2050 and beyond. 10. There is nothing in the plans about Lambeth's Net Zero Target	
Individual	R0534	Other	As a resident of West Norwood, I demand that the proposals for Site 18 and Site 19 are removed from the consultation and that new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0537	Other	My objection to proposed Site 18 and Site 19 plans	Please refer to the general response to representations made by individuals and businesses.
Individual	R0539	Other	I would like to express my views in relation to the SADP, in particular to proposals for Site 18 and Site 19. I have been a local resident for over 24 years, and make use of many of the local facilities and shops. Over that time, the area has benefited from a growing community involvement and sense of belonging, and has become a desirable location for new residents. Whilst I believe that certain areas would benefit from some development and renewal, and that there is a high demand for housing, I do not believe that the proposals for Site 18 and 19 are conducive to maintaining and enhancing the community's well-being. The timescale for consultation on these proposals seems wholly inadequate, and does not sit well with Lambeth's claim to be a co-operative council. I would therefore request that the Site 18 and 19 proposals be removed from the SADPD until such time as proper consultation takes place.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0541	Other	I am writing to state my opposition to both sites 18 and 19. While there is real need for affordable housing in West Norwood, and redevelopment of parts of the High Street, it is very clear that neither of these sites adequately meets these needs - and that both will cause considerable harm to the local area, to local residents and to businesses. You are no doubt already familiar with the substantial material arguments against these two proposals, as they have been strongly articulated on a number of local community forums. These include: • The excessive height of the buildings proposed, the 11-storey block next to the York Yill Estate, and the developments on site 18 which will overlook residents on the other side of the High Street • The threat to existing businesses • The fact that, in spite of the publicity for the project, there is no actual evidence that the proposals do anything to meet the need for affordable housing. Above all, however, the Council's planning process in this case has directly contradicted the principles of collaboration and consultation laid out in the April 2017 report Moving Forward, to which Lambeth Council	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>was itself a party.</p> <p>There has been virtually no consultation with local residents, businesses and councillors on a planning proposal which has strong local opposition, and which would profoundly affect the character of the entire neighbourhood.</p> <p>There is urgent need for redevelopment in the area, which is almost universally acknowledged by local people. Indeed, the Norwood Planning Assembly was established to work closely with Lambeth Council to enable such development. However, it is difficult to avoid the conclusion that Lambeth Council has very strongly favoured the financial interests of private developers over the interests of people who live and work in Tulse Hill and West Norwood.</p> <p>The failure to collaborate with local groups such as these, or to listen to the views of local residents and businesses would constitute culpable neglect on behalf of a Local Authority.</p> <p>I therefore urge you to drop the plans for sites 18 and 19 and to begin consultations to develop alternatives.</p>	
Individual	R0542	Other	<p>I object to the development of Site 18 and Site 19 as a local resident. Lambeth is once again providing no adequate public consultation - and this time it's on the development of high rise buildings on Site 18 and Site 19. It is going to destroy the character of the local area and wave goodbye to much loved independents such as Knowles, which add uniqueness and community. There is no reference to Lambeth's Net Zero target for 2030 - presumably because this would of course go against the target. It will also destroy the landscape of the low rise horizon residents and businesses love.</p> <p>STOP THIS ABSURDITY and find more creative ways as a council to build the local economy. We need to restore not destroy the local area of buildings and areas.</p> <p>Once again, Lambeth is an utter disappointment in living up to its green and sustainable promises.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0545	Other	<p>I am writing to you with regards to the site 18 redevelopment. This project will make an big impact in my business.</p> <p>Somehow I built up my business after pandemic and was planning to invest in my business to get more customers. But now I am afraid to buy the stocks needed to run my day to day business. Because I will be in debt if I close my business. This is the only earnings for my living.</p> <p>I need to know more details about this development as this will be helpful for me to make a decision about my business. My landlord is ready to extend my lease to 15 years but I am not able to make a decision due to this.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Details I would like to know include the following:</p> <p>Consultation time – 6 weeks is not long enough for such a big development</p> <p>Compensation – for physically closing businesses</p> <p>Business rates relief – will this be available due to business disruption from 'anchor' shops closing, traffic, building works, noise, pollution</p> <p>Timelines – how long could the disruption last?</p> <p>Compulsory purchase orders – will Lambeth use these to buy properties that landlords won't sell?</p> <p>Leases – would these be affected if landlords wanted to sell?</p> <p>Size of development – how could it happen, the entire street? block by block? or building by building?</p> <p>Access – would the building work behind the high street effect traffic/parking on Norwood Road and side streets?</p> <p>Directly affected retailers – would they have 'first refusal' on new units if theirs are demolished/renovated?</p> <p>Affordable rents – will independent businesses be priced out by multinational chains when the new units open?</p> <p>Environmental impact – how does the demolition of buildings fit with Lambeth policy on the Climate Emergency</p> <p>Please re consider the decision taken as this will affect our living.</p>	
Individual	R0546	Other	<p>The above planning proposals are completely unacceptable. West Norwood has a strong sense of community with widespread interest in humanising the high street and giving it a town centre feel. Your proposals fly in the face of those community objectives and of the improvements already achieved through the opening of lovely local cafes, shops and eateries. It's difficult to understand why the same council that invested in building the strong sense of community through the introduction of the WN Feast and the development of the Library and Picturehouse, now wants to destroy what it helped to create by dehumanising the area with huge blocks of flats. It is both incomprehensible and unacceptable. Lambeth Council has made a mockery of the thorough public consultation process that should take place before a character-changing and potentially catastrophic development like this takes place. We, the residents of West Norwood, DO NOT WANT IT. There is widespread frustration at the fact that you are prepared to give these hair-brained plans serious consideration.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0547	Other	<p>I demand the proposals for Site 18 & Site 19 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Portobello Brewery Ltd	R0551	Other	<p>Portobello Starboard Limited owns the freehold of 294-296 Norwood Road, SE27 9AF, trading as Knowles of Norwood. This public house has been underinvested in recent years and we, with the</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			encouragement and support of the local community, have committed to spending £750,000 to renovate the existing venue and to expand into the vacant next door unit, which has been an eyesore for the last five years. The BID has welcomed this investment as an asset to the business community with a particular improvement on provision of local workspace during the day. We note the interest of planners in redeveloping the whole of Site 18, in which we sit, and welcome the intention to enhance the local facilities, but strongly believe that our invested site should be considered a vital part of that future facility. Furthermore, having learned of this consultation only a week ago it is quite clear that a 6 week period for public consultation is thoroughly inadequate for such a major scheme, which will reshape an entire region in perpetuity. Finally, I should let it be known that we are totally committed to this site and that maintaining ownership of the freehold shall remain our priority. Any attempt to dissuade us from this position would be both time consuming and very costly and I sincerely hope that the plan for redevelopment maintains Knowles of Norwood as a vital feature.	
Individual	R0556	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0559	Other	I have seen the proposed plans for the development of Site 18 and Site 19 along the Norwood Road ,which will clearly have a very major and highly deleterious effect on the whole area. As a long standing Resident of this neighbourhood , I strongly oppose these plans , and request that they be withdrawn until such time as full and comprehensive consultation with the local Community has been undertaken to consider all aspects of the proposal .	Please refer to the general response to representations made by individuals and businesses.
Individual	R0561	Other	I am emailing to demand the immediate removal of the proposals in West Norwood for site 18 and site 19. The complete lack of public consultation on these developments is totally unacceptable given the huge scale of these sites. These developments will totally destroy the character of the area and It's clear that this is way more beneficial to developers and people poised to make huge profits, than it is to the local community. The proposals will have a huge impact on the environment that ignores Lambeth's own net-zero targets. If any developments are proposed, the local community MUST be consulted, moving forward.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0562	Other	I am writing to insist that you remove Site 18 from the SADPD. The consultation process MUST include the local community, and your current approach ignores all previous consultation. New plans must be	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>developed with the local community, or you risk alienating them and they will object with their votes in the local elections.</p> <p>It is so sad that Lambeth wishes to rip out the heart of our local community, wiping out local businesses and homes.</p> <p>As a local resident, I object to the plan for many reasons, the most pressing being:</p> <ol style="list-style-type: none"> 1. This is a terrible option for sustainability. We have perfectly good shops and businesses along Norwood Road, some of which are fairly new, all of which have been supported during Covid. It is incredibly bad for the environment to knock down existing buildings to build new ones which are not required. 2. Existing local businesses will not survive. 3. Existing national businesses will not return. 4. There is wasteland behind Norwood Road, which I would not be against developing – why can the proposal be limited to that? 5. West Norwood is a Zone 3 low rise residential community at this end of the area. An 11 storey block with be completely incongruous and out of context with the local area. 6. Hundreds of new homes are proposed, which the local traffic and transport infrastructure does not support. Let alone parking for these homes. 7. Environmental impact on existing homes, from overlooking to impact on sunlight affecting warmth inside these homes, to air quality from increased homes and traffic. <p>It is vital that you consult with and take into consideration the views of the local community and the long term impact of such a high density development in our quiet residential area.</p>	
Individual	R0563	Other	Both of the developments, site 19 and site 18 are completely out of keeping with the character of the area. They will loom over existing buildings. They seem to have been conceived of without a trace of sensitivity to local residents and businesses and should be removed from the site allocations development plan. Any future developments on the sites need to be designed from scratch with involvement from those they will actually affect.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0564	Other	<p>I am writing to push for the removal of Site 18 and Site 19 from the Lambeth Site Allocation Development plans.</p> <p>As a long term resident of West Norwood, I am wondering why are we being railroaded into these changes, they will have a huge impact on West Norwood, this type of decision needs time and careful consideration of the impacts, or the results could be catastrophic for the local community.</p> <p>The proposals ignore the strength of the WN community, and the</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>community cannot exist without a centre, and Norwood High Street is the centre.</p> <p>There is no way that Site 18: 286-362 Norwood Road is appropriate for a tall building in the middle of the site! This development removes one of the best known pubs in the area 'Knowles' which is inaccurately described as a Takeaway in your presentation. It also removes the local Iceland supermarket, so where do you expect people on lower incomes to shop? The only other supermarkets in the area are small local Tesco, Co-op and Sainsburys and they charge the premium prices that we have come to expect from local versions of the large supermarkets. What support and guarantees will be given to the business that will be impacted by this change, as they need to be retained in West Norwood at costs that are equivalent to the ones they currently pay. Where will these vital businesses be housed while the changes take place? I think these changes will see the destruction of these business, but we cannot have our current High Street shops replaced by fast food and coffee outlets because the rents are too high for any small business. If we lose our smaller shops, this will result in the loss of West Norwood as destination for shopping, and if you don't shop somewhere, you don't do anything else either, such as visit a cafe, eat at a restaurant, meet friends in the local pub. We need a solution that accommodates and supports the High Street, not one that destroys it, particularly at this time, when all High Streets needs our support.</p> <p>The presentation describes a 'new public realm and urban greening' as part of this development, how on earth can this happen when the road is the A215 heading south from the south circular, if you make green space here, where is the traffic going to go? Both of these proposals haven't been thought through, and they risk destroying what is a thriving, local, diverse and happy community. They need to be removed from these draft plans.</p>	
Individual	R0565	Other	<p>I am in SE21 but heavily oriented towards SE27/SW16 and use Norwood Rd most days. I am also a motorist who use Knollys Rd. quite frequently. I have lived in the area over 40 yrs.</p> <p>Lack of any warning about these proposals is striking. Site 18. Norwood Rd handles traffic and pedestrians quite well (meaning south of Lancaster Avenue). It would be tipped out of balance by such a huge development as Site 18. Shops,buses, parking would be overwhelmed at a stroke.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0568	Other	<p>I demand the proposals for Site 18 and Site 19 in West Norwood are removed from the consultation. These proposals are awful in several ways.</p> <p>New plans should be developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0570	Other	<p>We are writing about the proposals for development in the Knollys Road and Leigham Vale area.</p> <p>We consider that there has been inadequate public consultation and that the development as planned would destroy the character of this area.</p> <p>In addition, the plan appears to fail to take into account Lambeth's Net-Zero target for 2030.</p> <p>We demand that the proposals for Site 18 and Site 19 are removed from the consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0571	Other	<p>I'm writing as a Lambeth taxpayer to express my strong objection to the two Lambeth development proposals "Site 18 and Site 19".</p> <p>Site 18 shows replacement of a vast swathe of our current high street in West Norwood, with an associated loss of amenities and character. Our high street is well occupied by thriving retail businesses that mean residents are truly able to "shop local" and reduce our environmental impact in so doing. The inclusion of an 11 storey block in the Site 18 plan would also be a dramatic change at nearly 3 times the height of the current high street. This would wreck the low-rise aesthetic and cast a domineering shadow over the centre of our little town.</p> <p>The proposals at these sites indicate a huge increase in personal transport in an area that already struggles with traffic volumes and lack of parking, with our train and bus services unlikely to be able to scale sufficiently to absorb the increased day to day transport demand.</p> <p>I also wish to complain about the lack of adequate community consultation on these proposals, especially as they relate to high density development within a relatively small footprint. These proposals should be removed immediately and replaced by new plans developed in partnership with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0572	Other	<p>I am a resident at [address redacted]. I use the amenities of Norwood Road on a daily basis.</p> <p>I was very concerned to learn of the proposal to zone Norwood Road and Knolly's Yard as suitable for tall residential buildings.</p> <p>West Norwood/Tulse Hill is a vibrant town centre in Lambeth with a strong sense of local community and an important existing ecosystem comprising housing, light industrial and restaurants. Our 'high street' of independent retailers is successful, with low vacancy rates, and has proven itself resilient during the COVID crisis. We have reached this enviable position organically and nothing in the development proposals puts sufficient (if any) value on the sense of place that already exists.</p> <p>The proposals for tall buildings are completely unsuitable for this area. I understand these are the only two sites with recommendations for tall</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>buildings.</p> <p>The 286-362 Norwood Road site is suitable for considered redevelopment and investment that sees the community as a partner. However, we should have high quality urban design that recognises West Norwood/Tulse Hill as an existing successful neighbourhood with an enviable strong sense of community. For example, the Goldsmith Street development in Norwich won architectural prizes because of the way it considered the needs of the local community (see https://www.theguardian.com/artanddesign/2019/jul/16/norwich-goldsmith-street-social-housing-green-design). Why is that approach not suitable here? The existing delicate balance requires sensitive improvement and not crude ill considered generic “property developer” style development.</p> <p>I agree with the need for new mixed accommodation for local people at affordable rents. But these must be attractive properties in an attractive and balanced community. We need local homes for local people – designed in collaboration with local people.</p> <p>We also need ambitious environmental credentials with local green habitats for any development.</p> <p>Further, we need to further enhance (and not damage) the West Norwood/Tulse Hill town centre as a 15min Neighbourhood.</p> <p>For these reasons, Site 18 and Site 19 should be removed from the draft SAPD. Instead, incremental development (within an outline Master Plan) is the correct way forward as it enables the development to reflect the needs of the local community and changes in the way we live our lives.</p>	
Property department, Portobello Brewery Ltd.	R0573	Other	<p>Portobello Starboard Limited owns the freehold of 294-296 Norwood Road, SE27 9AF, trading as Knowles of Norwood – as of Dec 2021. This public house has been underinvested in recent years and we, with the encouragement and support of the local community, have committed to spending £750,000 to renovate the existing venue and to expand into the vacant next door unit, which has been an eyesore for the last five years. The BID has welcomed this investment as an asset to the business community with a particular improvement on provision of local workspace during the day. We note the interest of planners in redeveloping the whole of Site 18, in which we sit, and welcome the intention to enhance the local facilities, but strongly believe that our invested site should be considered a vital part of that future facility. Furthermore, having learned of this consultation only a week ago it is quite clear that a 6 week period for public consultation is thoroughly inadequate for such a major scheme, which will reshape an entire region in perpetuity. Finally, I should let it be known that we are totally</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			committed to this site and that maintaining ownership of the freehold shall remain our priority. Any attempt to dissuade us from this position would be both time consuming and very costly and I sincerely hope that the plan for redevelopment maintains Knowles of Norwood as a vital feature.	
Individual	R0576	Other	I strongly oppose the proposals for site 18 and 19 in west norwood. I am a resident of Royal Circus and these plans will greatly reduce my quality of living. We will fight til the end to put a stop to these obscene proposals.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0579	Other	This is to write in opposition of the huge tower blocks being suggested in the local area. This will ruin the area, the skyline, full the streets with building work and pollution and ruin the community. How has this been rushed through with no consultation of the local residents?? This would damage the community for Tulse Hill and West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0580	Other	I am a resident of West Norwood and this HORROR has only just come to light I demand the proposals for site 18 and 19 be removed from consultation !!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0581	Other	Both these developments will have a massive impact on the local community. Both are on a preposterous scale greatly impacting and destroying the very nature of both Tulse Hill and West Norwood. There is unlikely to be much if any social housing in these developments and a tower block of 22 stories is completely overpowering. This block is way larger than any other building within a huge area and will stick out like a sore thumb, regardless of any architectural merit brought to the development. The loss of habitat and businesses is huge. Couple this with the lack of parking and it is likely to destroy all surrounding roads. There will be no insistence that any occupiers will be 'car free' and there are no plans in place to accommodate any disturbance to the surrounding area. These plans have to be reconsidered. There has been very little local consultation on the development and little thought given to the effect on the area by dumping huge volumes of new residents into an infrastructure that can not cope. This is not the City or a riverside development, it is a tower block right in the heart of a low rise residential area with no thought as to the consequences. Stop this ridiculous development now.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0583	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans are to be developed with the local community. Site18:	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<ul style="list-style-type: none"> - No adequate public consultation has been executed in the run up to this development - This development will threaten local homes and businesses and does not consider the Net-Zero target for 2030 in Lambeth nor the vision for a town centre fit for 2050 and beyond. - I object to this building to be developed as planned. 	
Individual	R0585	Other	<p>Whilst I cannot argue that new affordable housing is not desperately needed and that developing housing on brownfield sites within urban areas is essential, I do find the proposals for Sites 18 and !9 not suitable developments for a suburban area. Site 18 will involve the destruction of 25% of the high street, which will have a huge impact on the current shops in the area all of which are well used by the local community. The area in question also includes homes for at least 80 families, who will have to move elsewhere. in addition the plan for an 11 story block is totally out of keeping with the height of buildings in West Norwood and goes against current Lambeth planning rules. The plans for sites for sites 18 and 19 should be withdrawn form the current consultation and new plans should be drawn up after consultation with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0587	Other	<p>We are writing to object to both Site 18 and 19 development in West Norwood.</p> <p>It is with concern we note the intention to close down the shops that make up Norwood High Street. The loss to the community of established shops will have a huge impact on local people, and the local economy. The closure of Iceland will hit the poorest and vulnerable the most. As a shop Iceland provides food for families at affordable prices. The loss of this store even for a short time will impact the poorest in our community.</p> <p>Wear About a small family business has traded in the area for many years providing school uniforms again catering for families particularly from the poorest background. The loss of this shop will severely impact families in our area.</p> <p>B&Q is not only a shop used by local people it is also a destination DIY store providing not just DIY for families but also provides building plumbing and electrical materials for local builders tradespeople .</p> <p>The impact of our area during the redevelopment will blight the area for years to come.</p> <p>The Victorian façade that is West Norwood will be lost for ever. Despite the council pledging not to change our area what is bring proposed will do exactly that.</p> <p>Whilst we all understand the need for more homes however this must not be to the detriment of the area. The need for affordable mixed</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			tenure housing for families is much needed but it is important it sits with the local area and community. The proposal for a 11 story block of flats is completely out of keeping. There is no indication of investment in the infrastructure – West Norwood is already short of doctors, school places this plan will even further put a strain on already struggling services.	
Individual	R0588	Other	Please remove the proposals of site 18 and 19 from the consultations.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0590	Other	I object in the strongest terms to the proposals for Site 18 and Site 19 in the West Norwood area. Quite apart from the fact that there has been little opportunity for consultation and this entire project smacks of back-door development whereby monstrous carbuncles appear before local communities even realise what is happening, the last thing any community needs post-Grenfell is a 22-storey tower block. What possible advantages for the local community will these two developments genuinely offer? I urge everyone involved to reconsider these plans. They are harmful and wrong in every regard.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0591	Other	As a resident of Tulse Hill I object to the planned development at Site 18 & 19 in the Lambeth Site Allocation Development Plans - Draft. Site 18 & 19 need to be removed as the community has not been consulted properly. This proposal is a radical neighbourhood change that the community needs to be given more and better opportunity to voice their opinions. I object to the uncharacteristic high rises and clunky broad-brush redevelopment - incremental development within an outline master plan should be applied. I object to the potential loss of B&Q and the proposed domineering oversize, high rise blocks that do not conform to best practise urban architecture.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0591	Other	I wholeheartedly agree with the stakeholder forum that: We shall be campaigning vigorously to have Site 18 and Site 19 removed from this Draft for the following reasons: <ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • These are the only two sites with recommendations for tall buildings. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>• This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes:</p> <p>It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.</p>	
Individual	R0592	Other	I am a West Norwood resident and I demand the proposals for site 18 and site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0594	Other	<p>I am a local resident and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>I strongly object to these highrises. The proposed development, Site 18, which includes tower blocks in the heart of West Norwood, is totally inappropriate for the area. Has Lambeth really considered the needs of the local community with these plans? The town centre, indeed the whole area of West Norwood has been in need of investment for years but the current proposals are not going to provide the right of type of investment. It will increase the population and pressure on local services without in return giving current residents an improved town centre with high calibre shops, services and businesses, e.g. choice of supermarkets, dry cleaners, opticians, pharmacies as well as smaller enterprises, e.g. Floral Hall, Blackbird Bakery. Look at Lordship Lane in East Dulwich as an example of how a high street (as well as many shops and trades in the side streets off) has been transformed over the last 15-20 years. We are being asked to accept a development which will destroy the historic character of the area, eliminate any feeling that this is a town centre with thriving businesses and amenities. It will take away shops, such as Iceland, Greggs and B&Q as well as a petrol station from the town centre. It is all very well to say the loss of the garage will improve pollution but petrol stations are currently an important local amenity and there are less and less of them. Promoting walking and cycling is admirable but it is not always practical to walk, cycle or use public transport rather than a car. For older people, parents with children, those with disabilities use of a car is important for</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>everyday activities, visiting a GP, dentist or hospital, shopping. There may be no direct bus or train route to a GP surgery or hospital. Alternatives take more time which people are short of or would be too physically demanding. On shops, I used B & Q this weekend to buy putty to repair a greenhouse window. It was easy to get to, if it closes I will have to drive several miles to a similar business or order online and wait days for delivery. These examples may sound minor but they are the sort of practical considerations that are important for people in their daily lives.</p> <p>Clearly there is a need for more housing in the area, including social housing but not this type of tower block development. Has nothing been learnt over the past 40 years about the detrimental effects of tower block living - as in the proposal for Sites 18. One of the benefits of living in West Norwood and Tulse Hill are the views over the surrounding area and on into the City of London. The planned housing developments will have a detrimental effect on the skyline. What is needed is housing on a human scale with green space around and built to high environmental standards.</p> <p>Please remove Site 18 and Site 19 from this consultation and work with the local community on developing new plans which would fit with the historic and suburban nature of the area.</p>	
Individual	R0596	Other	<p>My comments on the Proposed Site Allocations 18 and 19, part of the Draft Lambeth Site Allocations Development Plan Document (SADPD) are as follows:</p> <ul style="list-style-type: none"> • These sites should be removed in their entirety from this consultation and the local community be properly consulted to ensure appropriate community-lead development of the brownfield sites in question. • The relevant sites are in areas where, per Lambeth council's current guidance, there are no high-rise buildings - to suddenly build several in a very concentrated area will entirely alter the character of the local area for the worse. • Incremental development (within an outline Master Plan) is the only way forward and must be in collaboration with local people and businesses. • Our 'high street' of independent retailers, with low vacancy rates, has proven resilience backed up by statistics. • Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development. • We have a strong identity that blends independent business with residential accommodation in heart of our community. We have reached this enviable position organically and nothing in these development 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>proposals puts sufficient value on the sense of place that already exists.</p> <ul style="list-style-type: none"> • These proposals do not provide adequate provision for our existing 'dirty' businesses - e.g. scaffolding companies and car repair workshops. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood. • B&Q is an anchor store in West Norwood, another reason we can call ourselves a 15min Neighbourhood, we can see no specific proposals to retain this important business along with its essential parking - that is also an important asset for the rest of the shopping area. 	
Individual	R0597	Other	<p>I am a Lambeth resident and live within 150m of the Norwood Road boundary of Site 18.</p> <p>We are fortunate to live near a high street which provides a wide range of goods and services, all of which I and my family use regularly. B & Q, Iceland, Knowles, Woodfalls, Wearabouts and more.</p> <p>The proposed development means the loss of these really useful local shops and services, the employment they provide, and the character they bring to the community. Having seen other developments further along the high street and in other places, I am aware that even though retail units may be included in the plan, they are often empty for years. Existing tenants will not return.</p> <p>The height of the proposed buildings are out of scale with nearby buildings and will overshadow and dominate the high street. The proposals for sites 18 and 19, will utterly change the character of West Norwood. No other Lambeth town centre is being impacted on such a scale.</p> <p>The need for affordable good quality housing can be met in a more organic and sympathetic way, by developing sensitively in line with better models of neighbouring local housing - new and old.</p> <p>There appears to have been minimal community consultation, which is especially bad practice for a development on this scale.</p> <p>It appears to ride rough shod over local residents' interests. There are effective local planning interest groups including Norwood Action Group and the Norwood Forum who represent local residents like me.</p> <p>Developments on this scale, with such potential for long term impact on the economy and community of west Norwood should be introduced with full community participation including the involvement of these local interest groups.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0599	Other	<p>I have read through all the comments people have made about the proposed development and would like to make the following points:</p> <ul style="list-style-type: none"> • The proposals look back to the 20th century not forward to the mid 21st and a world where climate change will be a problem for us all • Passivhaus standards should be central to any plans for new 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>developments. For inspiration see: https://passivhausbuildings.org.uk/viewproject.php?id=638</p> <ul style="list-style-type: none"> • 12-22 storey concrete blocks are not climate or people friendly, quickly become run down and have no place in a low-rise residential area • West Norwood needs green, tree-filled hubs for its residents' health and recreation – think how the replanted area opposite Lambeth town hall has benefitted Brixton • A decision by Lambeth to develop in an environmental/zero carbon way would benefit all our children and grandchildren and bring huge goodwill and kudos to the council 	
Individual	R0600	Other	<p>I wish to protest and object against this proposed development and believe that site 18 and 19 should be removed from this consultation and any new plans are developed with the local community. This proposal will destroy good and useful local businesses. It breaks Lambeth planning rules, is too tall. Further I do not believe it will be affordable housing, it is a scam.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0601	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community The tower blocks are not only out of keeping with the surrounding area, but will cause additional traffic and pollution to an area which is already overwhelmed. The high street should be protected and small businesses allowed to thrive. I object to this development plan.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0602	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Friends of West Norwood Cemetery	R0604	Other	<p>The Friends of West Norwood Cemetery is concerned at the likely impact of the redevelopment of sites 18 & 19 on the existing and soon to be extended West Norwood Conservation Area and the Cemetery in particular. We appreciate the effort taken to establish the visual impact of the proposed tower blocks on the Cemetery by analysing five viewpoints (site 18: TVIA images 5-7 and site 19: TVIA images 1&2).</p>	Site 19 has been removed from the site allocations going forward and therefore the concerns about cumulative effects fall away. For Site 18, the height and massing of the buildings proposed have been revised in response to the consultation on the Draft SADPD. The revision has taken into consideration representations made in the course of the consultation as well as newly available evidence.
Friends of West Norwood Cemetery	R0604	Other	<p>For the first time since the late Victorian age the views of West Norwood town centre and the skyline beyond to the west and north from the Cemetery will be changed. We consider that this will be to the detriment of users of the Cemetery at the southern, western and higher locations. We accept that the analysis shows that the tower blocks away to the north and west at both sites 18 & 19 will appear separate from the much closer St. Luke's Church but draw a different conclusion. We do feel the eye will be drawn away from the church tower to the newly constructed modern tower blocks. The church tower will not retain its current</p>	<p>The position on St Luke's Church is noted. Officers disagree with the conclusion that harm results. Although the tallest part of the revised massing proposal continues to be seen behind the dome of the Longsdon mausoleum, the effect in the view is fleeting. Given that the road approaching the mausoleum is curved, the two forms (the dome and the top parts of the proposed buildings) will separate as the viewer proceeds along the road. The presence of mature trees and the distance between the dome and the indicative buildings proposed means the latter will not be eye-catching or unduly discordant.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			dominance. We are also concerned at the impact of both the site 18 & 19 tower blocks behind the dome of the Longsdon mausoleum. The degree of the adverse effect will depend on the actual height of the constructed tower blocks and the style of architecture.	
Friends of West Norwood Cemetery	R0604	Other	<p>Also, we are concerned at the likely impact on the West Norwood Conservation Area and the proposed extended area. Lambeth consulted on this extension from the end of November 2020 to 28 March 2021, but the impact of the developments on this extended area would appear not to have been analysed in the officers report. We submitted a number of comments, along no doubt with other local organisations and residents, but have heard nothing in response and are concerned at the delay in implementing the protection to be afforded by the extension.</p> <p>It would be appreciated if in addition to responding to our concerns on the adverse impact of sites 18 & 19, the impact of the proposed developments on the extension could be analysed and advice given on the results and the timescale to introduce the extended Conservation Area.</p>	The Council still intends to pursue the proposed extension to the West Norwood Conservation Area when resources become available. The effect on the potential extension to the West Norwood Conservation Area is picked up in the revised evidence being consulted along the SADPD Proposed Submission Version.
Individual	R0606	Other	<p>As a West Norwood resident for the past 46 years, I want to object in the strongest possible terms to the massive Site 18 and Site 19 developments that are suddenly being foisted on our community without the kind of proper consultation promised in Lambeth's 2017 Masterplan. This new Site 18 proposal, with an 11-storey tower block at its heart that is twice as high as any building in the vicinity, is patently quite out of keeping with the existing largely Victorian town centre and will destroy the much-loved character of the street.</p> <p>It beggars belief that such a disruptive plan should be proposed by a council that has presided down the years over a continual series of gradual improvements achieved in co-operation with the local community. They have ranged from wider pavements and planted beds to a new cinema and health centre which have made West Norwood's "high street" ever more attractive and appealing to independent retailers and the local community.</p> <p>Why on earth would you want to discard such a highly successful development process which has reaped such dividends and won wide approval from the community for this savage, destructive and costly, large-scale redevelopment? It makes no sense.</p> <p>Both proposals for Site 18 and Site 19 need to be withdrawn and new plans developed with the local community that show more sensitivity to the character of West Norwood and more respect to the people and businesses who live and work here.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0607	Other	<p>I am writing to protest in the strongest possible way about the proposed developments in West Norwood.</p> <p>I have lived in West Dulwich for 17 years. My siblings and I grew up in Upper Norwood (at Crown Point), and we went to school in Upper Norwood (on Convent Hill and Beulah Hill). I also went to college at Norwood Tech on Knights' Hill, and later lived in West Norwood (Cheviot Road) for a long time.</p> <p>These proposals will destroy West Norwood town centre, in particular the high street, as well as many businesses and jobs. We have a wonderful library and cinema, and sites of great historic interest such as the church and the cemetery. As well as the church, there are several other buildings of architectural importance such as the old library and the theatre, previously the fire station. Lambeth should be protecting the character of West Norwood, not building an 11 storey tower block.</p> <p>The traffic on the high road and surrounding roads is already extremely heavy and parking is a huge problem everywhere, spreading in all directions from West Norwood to Tulse Hill, along to Herne Hill and in our area West Dulwich. Traffic pollution from the South Circular is already very high, and the one way system around Tulse Hill makes it almost impossible to cross the roads safely. Surely all these problems will be made worse when there will be a huge increase in the number of residents and their vehicles that your plan will create.</p> <p>These proposals should be removed from the consultation and local residents and residents in adjacent areas should be able to have a say.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0608	Other	<p>It's with horror that I viewed the proposed plans to build on Sites 18 and 19 on Norwood Road.</p> <p>When I first viewed the artists impressions I thought it was some kind of joke but it appears there is some serious consideration to alter the high street to this extent.</p> <p>I ask that Site 18 and 19 be removed from these planning considerations.</p> <p>We have already witnessed the ugliness of the building on Thurlow Park Road and will now have to see the same happening opposite on the corner (that involved demolishing a perfectly decent and liveable Victorian house)</p> <p>Site 18 has an historic ghost sign (Bryant Matches) to it's side, thought to be over 100 years old and I doubt there's been much consideration for this unique feature.</p> <p>I'm sick and tired of witnessing inept and quite frankly amateurish architectural attempts to squeeze as much housing as humanly</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			possible into an already cramped borough. We require proper and informed engagement with the community.	
Individual	R0609	Other	I am writing to request the removal of sites 18 and 19 in West Norwood from the Lambeth Site Allocation Development Plans. I recognise that there is a desperate need for good quality, secure, comfortable, affordable housing for local people and that derelict land locally can and should be used for this purpose. However, these developments must involve considered consultation with the local community, respecting and protecting West Norwood's valuable resources, whilst creating housing that conforms to the highest environmental credentials.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0613	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. I would like to express my deepest anguish and upset towards the site 18 and 19 plans to build high rise buildings along West Norwood high street and Tulse Hill. As a local resident who is incredibly proud of how West Norwood has created a burgeoning community that is not only cherishing and engaging with the existing community it has also become a desirable place for many families that have moved here as it hasn't been taken over by developers. The low level characteristics of West Norwood we want to cherish and high rise living is proven to not create the positive living being claimed. West Norwood is a great example of how old and new works symbiotically to create a new modern London. This is due to the amazing work of the Norwood action group protecting mindless development to the detriment of local residence. No one wants to prevent positive development and growth but nothing about the plans meet either. The fact that these plans have occurred without the usual consultancy is very distressing and against all the promises we are made by Lambeth council. These plans will single handedly kill our community and take away some of the cherished local shops that serve our community and replacing existing shops with corporate retail brands that are the ones that can only afford what we know will be increased rent. These are shops that have been developed to meet our local needs and carefully curated for all types of residents. More importantly it's displacing and destroying peoples existing housing to be replaced with undesirable high rise living. There is so much evidence to show that it shatters families lives being moved to high rise and makes no sense you're taking away decent housing away to create something worse. No one wants to have another Grenville tower! There is no consideration of this development meeting or working with	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			the net zero target for 2030. Please please remove site 18 and site 19 from the plans or at least do us the decency of consulting with local groups before including so they can see the dire impact it will provide. Do this with humanity and decency. We've been through enough fighting against Southwark metals and the pandemic and just need to be involved to help grow our community and not see it destroyed.	
Individual	R0614	Other	This is a terrible plan and must not go ahead. It would totally destroy the character of the neighbourhood. The proposed high rise buildings would completely overshadow the neighbourhood. I understand that it would break Lambeth's own planning rules which discourage high rise buildings this far south. High rise buildings do not provide suitable accommodation for families. There has been little, if any, consultation prior to the release of this plan. For such a far-reaching plan there needs to be full consultation with the local community including all the local community associations to ensure full buy in by local residents. The plan does not say how existing businesses are likely to be affected and in particular how the local shopping will be affected. I understand this is intended to provide a 15 year blueprint for developers. In effect there will be 15 years of planning blight which is likely to destroy local businesses.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0616	Other	I'm writing to you about my alarm at the proposed construction of sites 18 and 19 in the West Norwood area. Not only are they yet more high rise buildings, completely out of keeping with the personality of the area and unsuitable as affordable housing for families, but the disruption caused throughout the construction process and beyond will be devastating for the livelihoods of local shop owners and the sense of community that has been painstakingly built through the area. I'm horrified at how easy it is for a project like this to slip through the planning process relatively unnoticed by the people that live in the area. It's sneaky and unnerving and as word is spreading, it's clear that the consensus from the people on the ground is massive opposition to the project. I urge you to please look further into the impact this will have on the entire area, the gentrification feels rife and it will be a travesty if these site go ahead.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0617	Other	I am a resident of west Norwood and I demand the proposals for site 18 and 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0618	Other	I am a resident of West Norwood and I demand the proposals for site 18 and 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0620	Other	<p>I wish to state my strong objection to the proposals for the above sites in respect of which there appears to have been no public consultation. With regard to Site 18 I would comment as follows:-</p> <ul style="list-style-type: none"> • The proposals represent what can only be described as over development • There would be a loss of local businesses in what has become an improved local town centre in recent years. The mixture of chain and independently owned businesses make the town centre interesting. Their removal would disadvantage non car owning local residents • The development is likely to lead to increased traffic congestion • The development proposals would be detrimental to the character of the local area <p>As a long term resident who knows the area very well and regularly uses local amenities and businesses I would urge that Sites 18 and 19 are removed from the consultation and new more appropriate plans are developed in conjunction with the community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0621	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0624	Other	<p>I would like to express my deepest concerns towards the site 18 and 19 plans to build high rise buildings along West Norwood high street and Tulse Hill.</p> <p>No one wants to prevent positive development and growth but nothing about the plans meet either. The fact that these plans have occurred without the usual consultancy is very distressing and against all the promises we are made by Lambeth council.</p> <p>More importantly it's displacing and destroying peoples existing housing to be replaced with undesirable high rise living. There is so much evidence to show that it shatters families lives being moved to high rise and makes no sense you're taking away decent housing away to create something worse. No one wants to have another Grenville tower!</p> <p>There is no consideration of this development meeting or working with the net zero target for 2030.</p> <p>Please please remove site 18 and site 19 from the plans or at least do us the decency of consulting with local groups before including so they can see the dire impact it will provide.</p> <p>We've been through enough fighting against Southwark metals and the pandemic and just need to be involved to help grow our community and not see it destroyed.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0628	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. These plans are ill considered and not in sympathy with the existing buildings in the area & will have a detrimental effect on the quality of life of the residents of West Norwood at large	Please refer to the general response to representations made by individuals and businesses.
Individual	R0629	Other	I, [name redacted] from [address redacted] have lived in West Norwood for over 30 years and am emailing to express my strongest possible objection to Site 18 and Site 19. The proposal will completely destroy the character of the local area. I have felt positive about recent improvements to West Norwood, including the gym and the cinema attracting new businesses to the area. However, Site 18 and 19 will ruin any hopes for this area for good. I feel totally let down by Lambeth this could even be proposed it is so clearly not in the areas best interests. The high density plan would replace 25% of our town centre with huge blocks, including 11 storey and 22 storey towers, breaking Lambeth's own planning rules with no vision for a town centre fit for 2050 and beyond. We will loose valued businesses we are dependent on, such as B&Q and other local businesses and jobs. Furthermore, the site is not viable for affordable, safe housing. There will be increased pressure on local services, less parking, traffic chaos and reduced air quality. I am also extremely concerned about the loss of light, amenity and visual skyline, as well as the destruction of wildlife and specially protected trees. I am appalled that Lambeth is attempting to inflict this on the residents of West Norwood and beyond without proper consultation. I demand that the proposals for Site 18 and 19 are removed from this consultation and new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0631	Other	The town centre (Site 18) should produce some affordable homes, though at the expense of demolishing the homes of more than 80 families and all of the more than 25 existing retail and other businesses between Lansdowne Hill and York Hill. Many would permanently lose their livelihoods. Just stop. We want Victorian style buildings in keeping with our local Architecture. Tulse Hill is already turning into a mess and no residents are happy and yet you keep ignoring us. Stop.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0633	Other	I wish to register my objection to the proposed development, Site 18 in Norwood Road. I have been a resident in West Norwood for over 40 years in three	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>different houses and was Principal of South London College. My children and grandchildren also live in West Norwood. In the last four decades we have seen West Norwood improve significantly as a place to live for families. This has happened without significant investment by the council.</p> <p>Having looked at the proposal I want to object on a number of grounds.</p> <p>1 The proposed development would completely change West Norwood which has evolved over many years.</p> <p>2 The size of the residential blocks would dwarf the current housing provision and not be suitable to young families. There is considerable evidence that families prefer low rise buildings which allow children to play outside safely and close to their homes. Lockdown during the pandemic emphasised this point significantly. Local families do need more homes but they must be suitable for them to enable all to enjoy a reasonable quality of life.</p> <p>3 I see no evidence of prior consultation with residents in the area. The plans look like they have been designed by people who have no intention or desire to live in West Norwood.</p> <p>4 I see no mention of significant improvements in the infrastructure to cope with the increase in numbers of households in the area. In particular, school places, doctors, dentists etc. Parking will become even more of a problem. While I accept the attempt to cut down on car ownership it is important for the planners to be realistic. People do have cars and they will need to park them somewhere. We have experienced major problems with water supplies in Norwood Road. I see no mention of this or the new sewage systems that will be required by the increased population density.</p> <p>5 Overall, the planned development is too big for the busy Norwood Road. Any development should take into account what the people want and how it can best be delivered. From what I understand not even all of our councillors have been consulted.</p> <p>In the past Lambeth have produced some models of people friendly developments in West Norwood. This is not one of them.</p> <p>It is vital that the council consult local people before going ahead with such large developments.</p>	
Individual	R0634	Other	<p>I oppose the proposed use of the sites. They are ill-considered uses of the available land in a discrete area that is a hub of smaller shops available to all incomes within a car-free 15 minutes journey. I have particular contempt for proposed buildings of such height: families really do not want to live in them; they're an eyesore which will change the whole feel of the area.</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0635	Other	<p>The town centre (Site 18) should produce some affordable homes, though at the expense of demolishing the homes of more than 80 families and all of the more than 25 existing retail and other businesses between Lansdowne Hill and York Hill. Many would permanently lose their livelihoods. This would decimate the community in this area. The planning blight has already started with businesses freezing projects, and even if plans should progress with reasonable speed there would be major local uncertainty and disruption for upward of 10 years. Would even the shops opposite and nearby survive the long-term turmoil? It would be far worse than the 18 months of Thames Water replacing the water mains.</p> <p>Lambeth probably sees West Norwood and Tulse Hill as easy targets toward creating precedents for far ranging further high-rise both here and in Streatham.</p> <p>NAG and all other community groups seek the removal of Site 18 and 19 from the plan. This is an unimaginative plan produced behind Lambeth's closed doors, being steam-rolled through, trying to increase homes numbers the easiest way – by high-rise and high density, long discredited for family occupation.</p> <p>Please reconsider with a credible proposal for creating a thriving place as opposed to focusing on housing at the expense of existing and future community and place.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0636	Other	<p>You should remove site 18 and site 19 from your plan and think again about them.</p> <p>Site 18 will destroy the shopping area of Norwood Road.</p> <p>You would be better using the site for a bypass road and then pedestrianise that section of Norwood Road.</p> <p>For both site 18 and site 19:</p> <p>High rise residential is not what people want, they want individual houses which is why a lot of people are moving out of cities.</p> <p>Any flats or houses should be social housing. Private sector and so-called affordable housing does nothing to help with the housing crisis - neither one is truly affordable.</p> <p>I did not notice anything in your plans about requiring solar PV panels on roofs of new buildings. This should be an essential requirement if we are to deal with climate change.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0637	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0638	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0640	Other	<p>I am very much against this development that has been sprung on the residents of West Norwood without any sort of notice. 22-storey blocks towering over a small High Street would not only ruin the High Street aesthetically, but would entail the destruction of several valued shops and businesses---and, ultimately, the community spirit that exists today.</p> <p>Even if, as I understand it, the proposals include retail space, the rents for those spaces would be far beyond what they are today. Unable to afford what will undoubtedly be much higher rents, the existing businesses would go to the wall.</p> <p>West Norwood has a wealth of heritage architecture---from the Gothic Revival cemetery to the former 1881 fire station (now a live theatre)---and a good healthy mixture of shops and residences. To sweep a large portion of that away would be foolish, I can assure you.</p> <p>I grew up in Gosport, a town on the South Coast, that in the 1960s, and in the name of 'progress', swept away beautiful Georgian squares and terraces (and historical buildings from the Napoleonic era---what a tourist attraction they would make now, had they been preserved), and the town is now, literally, dead. Tumbleweed. Nobody wants to either live or shop in it and so Gosport residents quite sensibly take the ferry to Portsmouth to spend their money. I don't want to see that happening to West Norwood. It would be a shame if it did.</p> <p>Along with several other concerned WN residents, I demand the proposals for Sites 18 and 19 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0642	Other	<p>I would like to express our opposition to the proposed plans for site 18 & site 19. Our area is already overcrowded, chaotic with new road restrictions and air quality is poisonous and deadly. Creating new homes in the remaining small green space left in the area will kill the wild life already scarce, will destroy trees that contribute to already deadly air quality at present and will destroy ambience of the place. Let alone the monstrosity that will arrive and hover over our streets and homes blocking light and views.</p> <p>Please do not go ahead with the plans, consider improving the existing dilapidating homes and communities rather than create more issues with overcrowding the local community and allowing these developments to destroy our local areas, create more strain on transport/ air quality/ wildlife/ parking/ right of light etc.</p> <p>Please do consider us the local people who already live here, pay taxes and cannot get a clean street with the current set up. Do not give in to greedy developers who again will build unaffordable homes without any consideration for the local businesses and tired communities.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Help to protect what we have already please. Please do not build these sites.	
Individual	R0643	Other	<p>I am aware of proposals for the above sites i.e. Site 18 and Site 19 which are of great concern to my local Community.</p> <p>No adequate consultation has taken place for locals to object as well as yet again, Lambeth riding roughshot</p> <p>Over considerations for appropriate development in our area. It is total madness to destroy the character Of our local area and put these huge out of character developments on our doorstep - and to even consider Erecting mega blocks right on our doorsteps and boundaries is total madness.</p> <p>What about us local people who have to put up with the extra noise, pollution and traffic not to mention The destruction of small independent businesses?</p> <p>If Lambeth claim to care about their community (i.e. their VOTERS!!!) put your money where your mouth is. Stop this inconsiderate ill thought-out madness.</p> <p>When is the next local election? We will remember.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0646	Other	<p>I live on Palace Road and wish to formally object to the current plan for the following reasons based on the proposal document:</p> <ol style="list-style-type: none"> 1. There is no provision for parking for the residents of this huge new development. 2. There is no provision for health or dental care for this development and no reference to whether our current NHS infrastructure can sustain this sort of influx of residents. 3. I can see no promise for protections for the existing storeholders? Some who have been on the high street for many years. Will they be provided with ring fenced opportunities to return to the high street? How will retailers on the other side of the street be compensated during the presumably long months of development and disruption they will suffer as the buildings go up? <p>I am pleased to see some properties with 3 bedrooms in the plans. But will these be made available as 'affordable' to those growing families living in the borough and needing suitable housing?</p> <p>I remember the previous scheme with 'town square' and retail anchors included in the plans and find the new scheme pretty disappointing, aesthetically. Isn't the rebuilding of a town hub a chance to enhance the community experience? Particularly at a time where local high streets are suffering such a slump where is the childrens play area or other social hub to generate reasons for families or other residents to come to the high street and also shop, avoiding the all too familiar 'ghost town' of a high street?</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			I recognise the need for additional housing in the borough and look forward to seeing refreshed plans.	
Individual	R0647	Other	I am contacting you as a matter of urgency and real concern, I strongly demand that the following proposals for Norwood road Site 18 and Knollys yard Site 19 are removed from this consultation and new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0648	Other	<p>I am writting to demand the propsals for Site 18 and Site 19 are removed from this consultation.</p> <ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact • This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes: <p>It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0650	Other	<p>We are writing to demand that the proposals for Site 18 and site 19 are removed the consultation and new plans developed with the local community.</p> <p>We are concerned at the lack of public consultation in relation to the development, and while recognising the need for social housing, cannot understand why a development which will seriously impact on the character of the local area is being considered. We would also like further clarification on how much of the development is indeed social and affordable housing.</p> <p>There will be an increased demand on local services which does not appear to have been taken into account, with a plan to move local shops which does not contribute to a healthy vibrant local community. The high street in West Norwood is already congested with traffic, and</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Lambeth appear to have ignored the impact on the health and well being of the local population.</p> <p>We are very very unhappy that Lambeth appears to be ignoring it's own green agenda, and by proposing a 22 story tower block is breaking it's own planning rules.</p> <p>There has been a distinct lack of communication between Lambeth council and the local community which is disappointing. We trust that you will now follow due diligence and ensure that the the plans are developed with the local community.</p>	
Individual	R0651	Other	<p>I would like to object to the plan as outlined, mainly because there is a serious lack of information given on the likely impact of the existing community and business in and around the affected site.</p> <p>I can see the opportunity with the site, but the proposed development plan says nothing about the impact on parking given the dramatic increase in residents in an area already congested and short of parking. What will happen to the existing tenants of the shops and businesses that are to be removed? Many have been around for a long time and are a key part of the local community. Will they get the opportunity to take up new premises at an attractive rate? Or will they be sacrificed for soulless chain stores with no connection to the people living around them?</p> <p>Where is the provision for local services such as schools, medical facilities, parking, public transport to support he dramatic increase in the number of residents?</p> <p>Lastly, I think the visual appearance and quality of architecture should be enforced to an incredibly high standard for the development. This site is the heart of our community, many people shop or socialise here every day, we need the development to be attractive, long-lasting, in keeping with the local vernacular...a new heart to West Norwood that we can be proud of. We don't need another private development that deteriorates rapidly, leaving us with a wasteland of empty shops, ugly buildings and excessive pollution and congestion.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0652	Other	<p>I am writing to object to the planned developments Sites 18 and 19</p> <p>I am a long-standing resident of West Norwood for 15 years and hope to remain here as my child grows up. I would be more in favour of proposals focused on affordable and social housing whilst maintaining the character and communal aspects of the area which make it an inviting place to live .Unfortunately, I am not convinced that the site has either of these priorities in mind and will in fact destroy local businesses and wildlife plus create more problems with traffic and pollution. The massive blocks will be completely out of character with West Norwood,</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			which is a community that tries very hard and deserves to be consulted about what would actually work.	
Individual	R0653	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Historic England	R0654	Other	We have concerns about the proposed height on this site due to the impacts this would have on the setting of the nearby heritage assets including West Norwood Cemetery and the West Norwood Conservation Area especially. We note that the SADPD requires particular regard to be had to this asset, along with the conservation area, however much a building of this height can be mitigated at application stage is questionable. The development would be an urban intrusion on what is essentially green, picturesque, contemplative part of the borough designed to have a garden character. It would be helpful for a more detailed assessment to be undertaken for this site as this may help draw out where sensitivities particularly lie which could then be used to set development requires to mitigate potential harm and to identify which parts of the site can perhaps accommodate greater height.	The visibility of distant development from within the confines of the cemetery has been fully assessed using the accurate VU-city model. Officers note the Historic England comment but do not agree that the indicative approach (which is not a development proposal) results in harm to the historic environment. Whilst the Cemetery may have been built in open countryside in the 1830s, it has been part of Greater London since the arrival of the railways a few decades later. West Norwood today has an urban character.
Historic England	R0654	Site Allocation Policy	We note that the evidence document recognises the importance of St Luke's Church as being the dominate focus and landmark for the area. Furthermore, the list entry for the Cemetery notes that the bell tower of the neighbouring St Luke's Anglican church to the south-west provides an interesting eyectacher from points around the site. We recommend that this finding is referred to within the allocation policy itself as development requirement. It would be helpful to see this modelled alongside the Knolly's Yard proposal as well so the cumulative impacts can be understood.	Noted. St Luke's Church is sufficiently distant from the Site Allocation that mention of the relationship between the Church and the Cemetery is not considered necessary for this policy as the visual role the Church plays as an eye catcher from Cemetery would be unaffected by any development on the Site Allocation site. The Knolly's Yard scheme is no longer being progressed as a Site Allocation site.
Individual	R0655	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0656	Other	I am writing to register my objections to the proposals to build high density accommodation along Norwood Road and close to Harpenden Road. The removal of established buildings, and the proposal to build up to 11 storeys high, will change the character of Norwood Road. It will also undermine the sense of community and cohesion in what has already become an unpleasantly congested area, due to traffic flow measures and road narrowing. The local infrastructure is already compromised. It is difficult to imagine how a large number of additional dwellings and residents can be accommodated comfortably. I would also be concerned for the negative	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>impact of the proposed work on our local businesses, particularly small independent businesses, who who have supported this community throughout the pandemic.</p> <p>Remaining businesses would also be negatively impacted by the disruption.</p> <p>I am concerned by the fact that local residents will be uprooted, with an emphasis on privately owned dwellings. Can you confirm the outcome of any studies looking at the possible impact of these proposals in terms of gentrification.</p> <p>Those of us in the local community who are fortunate enough not to be forcibly uprooted will have to endure the work.</p>	
Individual	R0657	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community as Lambeth previously committed to do.</p> <p>Its a travesty. Would totally destroy the beautiful Norwood Road. Have you taken into account where older local people are going to shop, especially those who don't drive, dont have a lot of money. West Norwood has a wonderful community and Lambeth want to destroy it. 11 Storeys high? What happened to the protected view, no building above 4 storeys and the poor people who live on York Hill Estate, what about the distress that will be caused to them?</p> <p>Yes we need new homes but the homes that will be built are not for local people or the people who need homes, what about those languishing on waiting lists, who will never be re-housed ,as more and more people have to move further out just to afford to keep a roof over their head. You want the poor people out of Lambeth. Shame on you.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0661	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>We are a thriving local community that wants to grow and develop but these plans will impact the daily lives of every resident negativity, put pressure on our local amenities, and impact the much loved high street.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0662	Other	<p>I am writing to you as an individual.</p> <p>I strongly object to these redevelopment proposals. The scale of the buildings in sites 18 and 19 are massively out of scale with the local streetscape.</p> <p>Worst of all is that local people have had no input into this plan which would change the town centre out of all recognition and set its appearance and function for the next 50 years and more. West Norwood, instead of being a local town, with residential areas close by, would start to look like the centre of a big city. The current major</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			buildings would be overwhelmed by the vast scale of these proposed buildings.	
Individual	R0662	Other	<p>I am a member of the Friends of West Norwood Cemetery. We are concerned at the likely impact of the redevelopment of sites 18 & 19 on the existing West Norwood Conservation Area and the Cemetery in particular. We appreciate the effort taken to establish the visual impact of the proposed tower blocks on the Cemetery by analysing five viewpoints (site 18: TVIA images 5-7 and site 19: TVIA images 1&2). For the first time since the late Victorian age the views of West Norwood town centre and the skyline beyond to the west and north from the Cemetery will be changed. We consider that this will be to the detriment of users of the Cemetery at the southern, western and higher locations. We accept the analysis shows that the tower blocks away to the north and west at both sites 18 & 19 will appear separate from the much closer St. Luke's Church but draw a different conclusion. We do feel the eye will be drawn away from the church tower to the newly constructed modern tower blocks. The church tower will not retain its current dominance. We are also concerned at the impact of both the site 18 & 19 tower blocks behind the dome of the Longsdon mausoleum. The degree of the adverse effect will depend on the actual height of the constructed tower blocks and the style of architecture.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0662	Other	<p>Also, we are concerned at the likely impact on the West Norwood Conservation Area and the proposed extended area. Lambeth consulted on this extension from the end of November 2020 to 28 March 2021, but the impact of the developments on this extended area would appear not to have been analysed in the officers report. We submitted a number of comments, along no doubt with other local organisations and residents, but have heard nothing in response and are concerned at the delay in implementing the protection to be afforded by the extension.</p> <p>It would be appreciated if in addition to responding to our concerns on the adverse impact of sites 18 & 19, the impact of the proposed developments on the extension could be analysed and advice given on the results and the timescale to introduce the extended Conservation Area.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0663	Other	<p>Hello I write to object to the proposals for sites 18 and 19 in the SADP. I fully understand (as a local government lawyer myself) the resource pressures that officers are under, and I support the Council's wish to deliver against the urgent need for new housing in the West Norwood area. However, the approach which is being taken to these sites is wholly out of character for West Norwood, would change the area detrimentally and permanently, and would mean that the new residents</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>occupying these blocks would suffer as well as the existing community. The proposed development for Sites 18 and 19. is radical, and entirely out of character for the area; it would cause very profound and significant damage to West Norwood and to local residents - even taking into account the urgent need for new housing. The nature of the area would be changed forever; these are not incremental or 'infill' proposals. No other Lambeth 'town centre' is proposed to have development on similar lines to sites 18 and 19.</p> <p>Obviously it is too early to fully comment on the consequences which would arise from these enormous developments (construction traffic, pressure on the West Norwood High Street existing businesses - they are already fragile - and other issues). However, Site 19 has such ENORMOUSLY constrained access problems that I think these consequences of the process of delivering that site should be considered at this point, and should mean that the current proposals should not go ahead. The roads adjacent to that site are narrow already and even with additional bridge(s) the sheer scale of the proposed works would mean that residents' lives would be complete misery. I fully understand that making this site financially viable, particularly given the access problems, might be argued by the developers to mean that this scale of development is required. But financial viability is only one of many considerations and should not be a consideration which overrides all others.</p> <p>In relation to both sites, the height of the two highest blocks is utterly out of character for the area. This is a residential neighbourhood very largely of low rise houses and blocks; the vast majority of the housing blocks are no more than 5 stories high. While there is increasingly development above this height - I think the new block at Tulse Hill may be 7 stories? - none of it is anywhere near the height of the highest block on Site 18 (which I understand is about 11 stories). And even that Site 18 block is way less than those on Site 19, where the highest block is intended to be about 22 stories! The higher blocks in both Sites would entirely change the nature of the area. West Norwood (and Tulse Hill) aren't particularly 'pretty' areas compared to some areas of Lambeth, but that's no reason to impose monstrosity of scale on us!</p> <p>I write to ask for the removal of sites 18 and 19 from the SADP. There has been completely inadequate consultation with the local community and it is therefore impossible for the Council to have taken into account the views of the community in relation to the proposals for these sites, which are wholly unacceptable as they stand. I will be emailing separately on my reasons for the proposals being unacceptable. The purpose of this email is to put forward the reasons why the sites</p>	

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>should be removed in their entirety.</p> <p>The only contact that there has been with the community has been a 1 hour briefing to a 'Stakeholder group'. That means that individual residents - I have lived in West Norwood for nearly 30 years - have not had an opportunity to be directly involved, nor have the Stakeholder Group been able to fully represent the views of residents who have themselves been able to understand the proposals. The proposals are therefore flawed, and so is the decision making.</p> <p>I fully understand (as a local government lawyer myself) the resource pressures that officers are under, and I support the Council's wish to deliver against the urgent need for new housing in the West Norwood area. However, the approach which is being taken to these sites is riding roughshod over the established Council and legal principles of engagement with the community, including the 2017 Masterplan approach.</p> <p>West Norwood is lucky to have an established group - a community volunteer led Neighbourhood Planning Assembly who are writing a Neighbourhood Plan. It has showed itself to be sensible and effective in developing planning approaches in the past with the community. I have attended several community sessions run by the Assembly and NAG in the past - including about past proposals for the laundry site (which were ENTIRELY different from that now proposed) - and would very much have wanted to attend. There is no good reason for not using that approach here.</p> <p>The effect is that there has been a failure to do consultation properly here, which means that the information obtained is inadequate. That means that the Council's obligations to consult have not been delivered. The consequence is that both the decisions taken so far and forthcoming decisions - if the proposal is not withdrawn - would be based on inadequate information and would carry a very significant risk of being substantively wrong.</p> <p>That risk is even graver given the nature of the proposed development for Sites 18 and 19. The proposals are radical, entirely out of character for the area, and would cause very profound and significant damage to West Norwood and to local residents - even taking into account the urgent need for new housing. The nature of the area would be changed forever; these are not incremental or 'infill' proposals. No other Lambeth 'town centre' is proposed to have development on similar lines to sites 18 and 19.</p> <p>Please ensure that my comments are taken into account.</p>	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0664	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0666	Other	We are residents of Lambeth and demand that the proposals for Sites 18 and 19 are removed from this consultation and new plans are developed after consultation with the community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0667	Other	<p>As a resident in West Norwood I would like to register my opposition to the proposals by Lambeth Council as outlined in the SADP regarding sites 18 and 19. The proposals offer no sense of how they would benefit, the community, the environment or even seek to provide economically achievable, quality housing for people wanting to live in the area.</p> <p>One of the considerable charms of West Norwood is the lack of tower blocks. It is an area of mixed housing, diverse communities, small, local businesses, ever improving amenities, excellent transport links. The pandemic has enabled many of us to appreciate more what we have on our doorstep.</p> <p>I am not opposed to encouraging development and affordable housing - we all should be able to have safe, decent, secure housing. However, it is not clear how adding buildings that are nearly twice the height of any existing residential structure in West Norwood and Tulse Hill (https://lambethsadpsite18.commonplace.is/proposals/site-allocation-policy/step1) benefits anyone other than commercial developers. The plans seem to be to enable developers to continue their indiscriminate desire to create anonymous, soulless, sub-standard accommodation with no desire to develop communities. Lambeth should be engaging with local groups such as the Norwood Action Group and Norwood Forum and even showing a bit of imagination and creativity and exploring concepts of gentle density (which is what I would suggest West Norwood already has) as discussed by organisations such as Create Streets: https://www.createstreets.com/front-page-2/library/resources/. Where are the long-term, multiple consultation events held in local places such as St Lukes, the Portico or the Library that would enable residents to see the plans fully and engage with their councillors and planners? There is also an established community volunteer led Neighbourhood Planning Assembly who are in the process of writing a Neighbourhood Plan.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0667	Other	I have looked at the visual documentations and mitigations published by Lambeth Council for site 18 specifically and feel that a lot of it is disingenuous at best: https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1641549573/projects/lambethsadpd/batch3/18_N	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>orwood_Road_COMPLETE.pdf.</p> <ul style="list-style-type: none"> • The images in the plan do not appear to overdevelopment. Where is a 3D model/visualisation in an accessible area (e.g. West Norwood Library) that residents can consult? • The vast majority of the photographs used are out of date and don't reflect West Norwood as we see it. • Even in your pictures it is clear that a high storey building will intrude on the skyline of West Norwood residents from whichever direction you look, even taking into account your assertions about the harmonising effects of building materials used in manufacturing the largest of the blocks. • Whilst there are no designated heritage assets within the proposed development it is immediately surrounded by local conservation areas and places such West Norwood Cemetery that are heritage assets. • The townscape and visual impact assessment summary at various points describes the development as acting as a 'focal point' and 'introduction' to the town centre - this is nonsense. West Norwood currently has a focal point and introduction has a focal point and that is the much better St Luke's Church. <p>What Lambeth are trying to do is set a precedent. If this development goes ahead, it will create a precedence which will encourage over development by giving planning permission of new taller buildings or alterations to existing structures. The experience of the residents in Ealing, is I believe, indicative of what Lambeth's long-term plans are: https://stopthetowers.info.</p> <p>I do not believe the plans for site 18 (and site 19) consider the needs of local residents and do not add anything to West Norwood that would make it attractive to potential residents and should be rethought and removed from the SAPD consultation.</p>	
Individual	R0668	Other	<p>I would like to add my voice to the objections to the proposed out of character developments for both Norwood road and Knollys Yard. The whole process has been undemocratic, non-consultative and the proposed developments are utterly out of proportion with the surrounding area and will be to the detriment of the local community. I would like to also know, given Lambeth has declared a Climate Emergency, how this proposed development will contribute to the solution to this emergency.</p> <p>I'm also led to believe that an 11 storey block runs counter and is in fact breaking Lambeth's own planning rules.</p> <p>This proposal cannot go ahead until a full consultation, with all local residents and stakeholders has been undertaken</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0670	Other	<p>Objection to proposals for sites 18 and 19</p> <p>I want Lambeth to know of my outrage at the proposed 'development' of sites 18 and 19. These were cooked up behind Lambeth's closed doors without seeking meaningful input from the people that live here. I quite understand the need for more homes but who, these days, actually believes that monstrous concrete towers (or similar) is the way forward? I'd like to see these ideas--hashed together undemocratically--scrapped.</p> <p>Then, perhaps, Lambeth might consider actually talking with us.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0672	Other	<p>I am writing to ask for removal of sites 18 and 19 from the Lambeth Site Allocations Development Plan.</p> <p>Site 18, especially, will profoundly impact the retail and residential heart of West Norwood and Tulse Hill. This plan has not been made in consultation with the community. I am especially disturbed by what would be the loss of B&Q along with many of the independent retailers that contribute to a strong community environment and make this high street a 15-minute neighborhood. For both sites, the proposed buildings are not at all in keeping with the area; they are completely too tall. What a blight to the area they would be.</p> <p>As such, these two sites should be removed from the larger plan allowing for more cooperation and collaboration with the local community to make an informed decision and plan that truly benefits the area.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0677	Other	<p>I am extremely concerned that Lambeth Council has included two sites in West Norwood (Sites 18 and 19) in its draft SADP. I fully accept that there needs to be a development framework for both these sites, and that more housing is desperately needed, but - unlike the other sites in the draft SADP - these will fundamentally change the nature of the local area. As such, I believe that they need to be the subject of effective community engagement, in line with Lambeth's commitment to being a co-operative council.</p> <p>Site 18 will have an dramatic effect on the nature of the West Norwood, and by extension, the Tulse Hill, town centre; while both - and particularly site 19 - will change the whole of the surrounding area from a cityscape of low rise, relatively homogenous buildings (gradually built over decades and centuries) to something far less congenial for all those who live and work here, with incongruous high rise buildings, setting a precedent and a completely different context for future developments in the surrounding area.</p> <p>Given that these proposals set out a radical framework for the long term future of this area, they should not be taken forward without significant local engagement. The council has previously engaged with the</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>community in ways which have demonstrated good intent and good practice, and this has led to a number of successes for the area. There is well developed community capacity, in a wide range of local organisations, to work with the council in order to develop plans with local ownership which reflect the area's needs and the council's wider responsibilities, and then to engage in their delivery. There is a strong track record of local community organisations and networks working together in partnership, and the council should draw on the expertise and experience which this reflects in order to engage effectively and develop plans which could be models of best practice and achieve real change. This would be consistent with the council's own Masterplan from 2017 (Moving Forward: A Collaborative Approach to Delivery), which described putting principles of collective action, collaboration and partnership at the heart of efforts to work towards agreed objectives and aspirations for the area. There is an established community volunteer led Neighbourhood Planning Assembly whose members are writing a Neighbourhood Plan, and yet the draft SADP cuts across this work, as well as being at odds with the approach set out in the Masterplan. We have the Norwood Forum and the Norwood Action Group and a range of tenants and residents associations and other community groups who would be willing and able to work together, and ensure the engagement of the full range of local voices. Instead, the current draft SADP ignores the previous and current good work which the council has undertaken with groups in West Norwood and Tulse Hill and puts forward radical plans, out of keeping with the local area, with minimal time to comment and no opportunity for serious consultation, let alone engagement. I will write separately with my specific comments on the current proposals for Sites 18 and 19, but I would ask that they are removed from the draft SADP, given their profound impact on the nature of the West Norwood/Tulse Hill area, and a process of effective local engagement is established to develop a suitable planning framework for these key sites.</p> <p>Site 18</p> <p>This is a major development which will fundamentally change the nature of the high street and surrounding areas, which are the real heart of West Norwood. This is the vibrant centre of our community, with local shops and other facilities. It has been remarkably resilient, evolving over time to reflect changing needs and patterns of life, even or particularly, through the pandemic, when we have all had some experience of living, shopping, socialising, and being active and engaged within our '15 minute neighbourhood'. It should be supported to continue its evolution, whereas wholesale redevelopment risks losing</p>	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>this organic, responsive approach.</p> <p>The West Norwood area currently combines residential, retail, industrial and cultural settings in a way which is vibrant and sustainable, and it is key that further development of the town centre continues to facilitate this mixed usage, with its mutual benefits.</p> <p>The under-used areas behind the high street do lend themselves to development and could properly accommodate a relatively high density of housing. But blocks of 36m, rising to 81m at the centre of the site are completely out of character for the area and will destroy the current sense of human scale. They will dominate the other buildings, risk creating their own wind tunnels (see examples in Croydon, Euston, London Bridge for the unintended impact of high rise blocks) and are unlikely to provide a safe and suitable environment, given:</p> <ul style="list-style-type: none"> • What we now know about fire safety (Grenfell Tower, Lacanal House, etc) • What we have learned from the pandemic: the importance of access to outdoor space for mental and physical health, and the health issues related to adequate ventilation • The critical need to pursue a sustainable approach in terms of investment in new build or refurbishment and future requirements for heating, cooling, ventilation, etc • The evidence base about the value of streets, rather than high rise, for the development and maintenance of community cohesion, social interaction and community resilience. <p>There are more and more examples now of high density, street level or low rise developments which are loved by their residents and neighbours, and it would be a backward step for Lambeth, as a cooperative, forward-looking council, to pursue a style of development which is fast becoming discredited.</p>	
Individual	R0679	Other	<p>I am writing to you to register my objection to your plans for Sites 18 and 19 in your Site Allocation Development Plan Document.</p> <p>The density of housing in the rail triangle between Tulse Hill Station and Knolly's Road will result in extreme pressure in terms of traffic and parking on the nearby roads, which are all narrow, overparked and difficult to navigate. In addition, the height and density of the housing is out of character with the neighbourhood, which is consistently low rise and predominantly family housing. It makes no sense to build what would be the tallest building in suburban Lambeth with the associated density of occupants in a space with such poor access.</p> <p>West Norwood High Street is already under threat because of the revived proposals to place a Waste Management site into a congested one-way segment of the thoroughfare, and the proposals to redevelop</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>the street with more high density housing further threaten the quality of life in an area that is finally (after years of neglect) starting to become established as a vibrant community. The area is already under pressure from the displacement of Low Traffic networks for the rich residents in Dulwich, and turning the whole area into a building site for an extended period will further reduce the quality of life and the ability of the area to function as a community.</p> <p>Please could you confirm receipt of this objection and register it for future reference.</p>	
Individual	R0680	Other	<p>I am dismayed to see the plans for West Norwood. They are completely out of keeping with this area and threaten the whole character of our town centre.</p> <p>I would ask that these plans are removed from this consultation and new plans developed with the local community.</p> <p>Please keep me informed.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0682	Other	<p>Following recent briefings of the above proposed scheme by Lambeth Council's Development Team, I object to the proposal on the following bases and request plans are removed from consultation:-</p> <ol style="list-style-type: none"> 1. The out of proportion overdevelopment of the scheme makes it wholly unsuitable for an already congested neighborhood. Notably, already congested services will be disproportionately put under stress, including bus, high street and Train (West Norwood/Tulse Hill stations) services, based on new residents at the proposed levels 2. There has been insufficient engagement with the local community to address the long term impact of the scheme on the area. <p>To reiterate, I object to the proposal on the following bases and request plans are removed from consultation.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0684	Other	<p>I have been a resident of West Norwood for over 35 years - and am greatly concerned that the proposals for Site 18 and Site 19 have been developed without adequate public consultation - and if developed as proposed will destroy the heart of our town centre by including overly tall buildings which are completely out of character with the area and by removing local amenities and trees.</p> <p>I would like to suggest that new plans for very much needed housing that are in keeping with the area could be developed following proper consultation with the local community.</p> <p>I cannot see either how this development ties in with the StreetSpace consultation I took part in last week about improving the streets in the West Dulwich area to reduce traffic and improve air quality... Surely a major development like the one proposed, which would increase the number of residents and cars in the area, would greatly reduce air quality and increase pollution - which seems completely opposite to</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			what StreetSpace is proposing. PLEASE DO NOT GO AHEAD WITH THIS PLAN - WITHOUT ADEQUATE AND CO-ORDINATED LOCAL CONSULTATION	
Individual	R0690	Other	This email is to REJECT the plans for site 18 and 19 which has been proposed. I strongly oppose to these plans as the area is not fit for such construction and will put immense pressure on local amenities and transport.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0691	Other	I am a resident of West Norwood (see my address below), and I demand the proposals for Site 18 and Site 19 are removed from this consultation and that new plans be developed in consultation with the local community. All the people I know in our Residents' Association for Robson Road are against the proposals. I see the plans as disastrous for this neighbourhood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0693	Other	I am a resident of West Norwood and I request that the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community. The proposals are utterly out of keeping with the character of the neighbourhood and undermine all the fine regeneration work the Council has undertaken in West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0694	Other	We were very surprised to see your proposals for the re-purposing of large swathes of West Norwood for the use of high rise residential accommodation. While we appreciate the need for housing, particularly affordable, this proposed land use would create hugely out of character developments for the area. We wish to maintain a vibrant highstreet and fear this proposal would work against that. IF these sites are allocated for development at such heights, it will make it harder to have any meaningful engagement around future planning applications. Please can we have proper local consultation on these proposals for land use to convince the local community that such land use is in the benefit of the local economy, community and environment.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0695	Other	I object to the West Norwood Site18/19 proposals and demand the proposals for both Site18/19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0696	Other	My partner and myself are in strong opposition to these proposed development plans. We are locals, living at the bottom of St Julians Farm Road, and until a flyer appeared through our door on the weekend, we had no clue about the proposals. Such vast and centrally located developments surely must require more consultation with the local community, particularly the businesses and neighbours affected!? The biggest issue we have is the monumental change to Norwood highstreet, and the businesses there. We support development of site	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>18 to a certain extent, as much of the light industrial sites behind the highstreet are neglected and abandoned, but altering such a large stretch of the town center would be soulless. One thing we cherish about West Norwood is it's semi industrial feel, with DIY shops and 'Norwood Works' - there is a healthy mix of retail and light industry. We would be devastated to lose B&Q! We are there almost every weekend - it is incredibly convenient and valued by the community. And Knowles, the pub in the old homeware store has fantastic character. The scale of this proposed site 18 will create a character-less dead zone. Both sites are too large and too intrusive.</p> <p>Please keep us informed with any developments on these porposals.</p>	
Helen Hayes MP, for Dulwich and West Norwood (Labour)	R0698	Other	<p>Site 18 has been the subject of proposals for development and planning applications for many years. It is an extremely high profile site on Norwood Road, in the heart of West Norwood town centre. Previous planning applications have been rejected because they have been of very poor design. It is also the case that the Council's objective to achieve comprehensive redevelopment of Site 18, in an environment in which the Council does not have the funds to undertake land assembly, has to a large extent blighted this site.</p>	<p>The purpose of the Site Allocations Development Plan Document is to set a vision for Site 18 which outlines the basic parameters that should guide any future development of the site. Such parameters include land uses and their quantum as well as indicative heights of buildings. The SADPD is not a development proposal for the site. Development proposals on any of the parcels within the site will be put forward by applicants in due course and follow the standard planning application process. Planning application proposals will be assessed against Lambeth's Development Plan policies, including the London Plan, Lambeth's Local Plan and the Site Allocations Development Plan Document once adopted.</p> <p>The Draft SADPD document consulted as part of Regulation 18 recognised the potential for the redevelopment of the site to accommodate approximately between 390 and 470 self-contained residential units (gross) and between 5,000 and 7,000 sqm GIA of commercial/community floorspace. The site allocation for Site 18 also indicated the height of future buildings within the site could range between 15 and 21 metres, with the central part of the site being appropriate for a tall building of a general building height of 36 metres.</p> <p>As indicated in the email from Cllr Danny Adilypour to relevant stakeholders on the outcome of the SADPD review following the Regulation 18 consultation sent on 21 December 2023, the quantum and massing stated above have been amended in the SADPD Proposed Submission Version. The new version of the SADPD will be made public for Regulation 19 consultation and subsequent submission to the Planning Inspectorate for independent examination.</p>
Helen Hayes MP, for Dulwich and West Norwood (Labour)	R0698	Other	<p>The boundary of Site 18 has been redrawn in the SADPD to include three social housing blocks and a number of private homes. There has been no prior discussion of this with the residents of these homes or the wider community, and no justification is set out in the SADPD for demolishing and replacing these homes. It is entirely wrong and frankly insulting, to place residents under the uncertainty of possible</p>	<p>As stated in Cllr Danny Adilypour's email dating from 21 December 2023, following the Reg 18 consultation, the draft site allocation boundary has been amended. These amendments include the exclusion of existing housing at the north and south of the site, as well as 346-362 Norwood Road and 286-298 Norwood Road. The revised boundary has been included in the SADPD Proposed Submission Version.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			redevelopment – possibly for many years to come – without testing the views of residents on their current homes, and without setting out any justification for demolition in social or environmental terms. The three social housing blocks and private homes must be removed from this and any future proposals for Site 18.	<p>Please note that inclusion in the site allocation boundary does not imply every part of the site will come forward for development. The policy wording in the SADPD Proposed Submission Version has been amended to make this clear.</p> <p>Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected. Any potential loss of existing housing will be dealt with in accordance with London Plan Policy H8 and Local Plan Policy H3.</p>
Helen Hayes MP, for Dulwich and West Norwood (Labour)	R0698	Site Allocation Policy	There is no mention of the needs of the All Nations Christian Centre Church. All Nations Christian Centre is an important faith community in West Norwood, active in the community, particularly with regard to their work with young people. Any proposals for Site 18 should include a strict requirement to re-provide this church.	In response to this and other representations received, the policy wording in the SADPD Proposed Submission Version has been amended to make clear any future development proposals will need to comply with the requirements set in Lambeth's Local Plan Policy S1, which safeguards existing social infrastructure. As per Policy S1 B, existing community premises will be safeguarded unless it can be demonstrated that i) there is no existing or future need or demand for such uses, ii) replacement facilities of equivalent or better functionality are proposed on or off site, or iii) the development of the premises for other uses, or with the inclusion of other uses, will enable the delivery of approved strategies for service improvements.
Helen Hayes MP, for Dulwich and West Norwood (Labour)	R0698	Site Allocation Policy	The SADPD states that there are no significant heritage assets or views that will be impacted by the development of a tall building on Site 18. This is incorrect. A tall building will be visible from West Norwood Cemetery, which is both an historic asset and a vital green amenity. A tall building on Site 18 will also be visible from within the grounds of the Grade II* listed St Luke's Church.	<p>Visibility from heritage assets should not be confused with heritage harm. For heritage harm to result the significance of the heritage asset would have to be harmed by that visibility. Views from the Cemetery and from St Luke's Churchyard have been tested. In both instances the indicative approach is not considered to have an adverse impact on the significance of those assets (including setting).</p> <p>To be classed as tall in this locality (south of the South Circular Road) must be over 25m in height. In this instance, the greatest height is identified towards the centre of the site with heights stepping down towards the perimeter. This approach is considered a sensitive one to the established context.</p>
Helen Hayes MP, for Dulwich and West Norwood (Labour)	R0698	Site Allocation Policy	I request that Site 18 is withdrawn from the SADPD and instead a co-design exercise is undertaken to enable new development to come forward on existing land ownership patterns, according to principles and a design framework developed with the local community.	As indicated in the response to previous points raised as part of this representation, the purpose of the Site Allocations Development Plan Document is to set a vision for Site 18 with outlines the basic parameters that should guide any future development of the site. Development proposals on any of the parcels within the site will be put forward by applicants in due course and follow the standard planning application process.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				Lambeth's Statement of Community Involvement outlines further opportunities for community involvement available along the planning application process. These opportunities include opportunities for community involvement led by the developer or applicant, who are encouraged to engage with the community and stakeholders before submitting any application. The planning application process also allows for members of the community and community groups to submit representations during the planning consultation period open for all planning applications, which normally lasts 21 days. Anyone can respond to a planning consultation regardless of whether they are specifically consulted or not. Any interested parties are encouraged to register with the Lambeth's Planning Applications Database in order to be notified about applications in their area or any part of the borough they are interested on.
Individual	R0700	Other	<p>Having lived in West Norwood for the past 46 years I was full of praise for Lambeth, which was very supportive of our alterations to accommodate my invalid mother. My admiration increased yet more with developments such as the library, cemetery and walkways. This morning my three year old grand-daughter helped to plant the new flowerbeds on Norwood High Street and I found myself wondering how the borough responsible for these thoughtful community schemes could also produce the latest plans for sites 18 and 19. I find it impossible to believe that the two departments ever communicate?</p> <p>I want to object strongly to these developments which have suddenly beeg foisted on our community without the kind of proper consultation promised in Lambeth's 2017 Masterplan.</p> <p>This 11-storey tower block at its heart of the site18 proposal is twice as high as any building in the vicinity, is patently quite out of keeping with the existing largely Victorian town centre and will destroy the much-loved character of the street. .</p> <p>I would like to support any plan to increase the affordable housing stock, especially for our unfortunate younger generation. I lived through the failure of 'homes in the sky' schemes as they turned into tower block slums where crime was rife. Please do not construct any more of these structures. I also fear the plan's suspiciously vague promise of 35-50 percent "affordable" housing, having seen such promises reduced to little or nothing as the development progresses and profits start to shrink.</p> <p>Both proposals for Site 18 and Site 19 need to be withdrawn and new plans developed with the local community that show more sensitivity to the character of West Norwood and more respect to the people and businesses who live and work here.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0701	Other	<p>I have lived in the area since the 1950s and I am appalled by such a scheme. We demand the removal of Site 18 and Site 19 from the proposed consultation.</p> <p>This is a monstrous development which would destroy small shops and businesses and there has been no adequate public consultation. Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill, one of the five town centres recognised by Lambeth.</p> <p>There is an established community volunteer led Neighbourhood Planning Assembly who is writing a Neighbourhood Plan. This forum should be used to develop genuinely collaborative and community driven proposals for these two sites.</p> <p>This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Master plan: Moving Forward: A Collaborative Approach to Delivery, describes:</p> <p>It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0702	Other	<p>I am writing to reject the plans for site 18 and 19 which has been proposed.</p> <p>I strongly oppose to these plans as these constructions will significantly cause further pressures on local services, transport , parking and local amenities. Furthermore, these buildings are extremely tall and will destroy the appearance of the surrounding area, demolish trees/wildlife and further increase pollution and affect air quality.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0703	Other	<p>I am writing to object to current plans for site 18 and 19 in Lambeth. The objection is on the basis of lack of local consultation, the knocking down of original Victorian architecture and creation of high rise accommodation. The last issue is not welcomed in the area and is not necessary to provide affordable, reasonable housing for people. This will add to a division within the community. People who need affordable housing need to be offered accommodation which is of good standard, makes them feel pride and worth and provides them with a home that integrates them into a community/is inclusive and doesn't promote a sense of lack of opportunity and exclusion. These are known factors to</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>promote poor mental and physical health and potential for crime. There are already drug and knife related problems in this area like many in London and this will not support to address these issues just enhance them.</p> <p>I hope this can add to the local perspective to help oppose this development and consider alternatives which will protect local heritage, the sense of community and consider affordable housing which is fit for purpose and values all individuals in the community and supports longer term costs around mental/physical health, social care, crime and quality of life.</p>	
Individual	R0706	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0711	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0713	Other	<p>I wish to register my opposition to the proposals by Lambeth Council as outlined in the SAPD regarding sites 18 and 19.</p> <p>West Norwood is predominantly an area of low/medium rise buildings, mixing various tenures of housing, diverse communities, small, local businesses, ever improving amenities, and excellent transport links. The pandemic has enabled many of us to appreciate more what we have on our doorstep. We should be protecting these architectural features rather than seeking to disrupt them with unwelcome and unsightly new ones.</p> <p>I am not opposed to encouraging development and affordable housing - we all should be able to have safe, decent, secure housing. However, it is not clear how a site which includes buildings that are nearly twice the height of any existing residential structure in West Norwood and Tulse Hill benefits anyone other than commercial developers.</p> <p>These plans seem to have been developed with little consultation. Lambeth should be engaging with local groups such as the Norwood Action Group and Norwood Forum. I would like to have seen long-term, multiple 'planning for real' consultation events held in local places that would enable residents to visualise the plans fully and engage with their councillors and planners. There is also an established community volunteer led Neighbourhood Planning Assembly who are in the process of writing a Neighbourhood Plan.</p> <p>I do not believe the plans for site 18 (and site 19) consider the needs of local residents and do not add anything to West Norwood that would make it attractive to potential residents and should be rethought and removed from the SAPD consultation.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0713	Evidence	<p>I have looked at the visual documentations and mitigations published by Lambeth Council for site 18 specifically and feel that a lot of it is disingenuous at best:</p> <ul style="list-style-type: none"> • The images in the plan do not appear to scale. Where is a 3D model/visualisation in an accessible area (e.g. West Norwood Library) that residents can consult? • The vast majority of the photographs used are out of date and don't reflect West Norwood as we see it. • The choice of views given in the evidence ignores the perspectives which would show the potential development at its most incongruous with the area ('blocking' existing buildings on the plan, to make them seem denser, hence justifying similar density on the opposite side of the road is incredibly misleading) • Even in your pictures it is clear that a high storey building will intrude on the skyline of West Norwood residents from whichever direction you look, even taking into account your assertions about the harmonising effects of building materials used in manufacturing the largest of the blocks. • Whilst there are no designated heritage assets within the proposed development it is immediately surrounded by local conservation areas and places such West Norwood Cemetery that are heritage assets. • The townscape and visual impact assessment summary at various points describes the development as acting as a 'focal point' and 'introduction' to the town centre - this is nonsense. West Norwood currently has a focal point and introduction has a focal point and that is the much better St Luke's Church. <p>What Lambeth are trying to do is set a precedent. If this development goes ahead, it will create a standard for design that will see other applications submitted with little likely opposition, leading to over development by giving planning permission of new taller buildings or alterations to existing structures.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0714	Other	I am a resident of West Norwood and I demand the proposals for site 18 & 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0715	Other	<p>My wife and I are long term local residents in Lambeth who live near and enjoy the facilities of West Norwood and Tulse Hill. We know the area well and are involved in the community. We use the shops and facilities located in Site 18 and in the rest of West Norwood and Tulse Hill.</p> <p>We strongly object to the proposals to redevelopment the areas called Site 18 and Site 19. We request the proposals for Site 18 and Site 19 be removed from the consultation.</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>1. The proposals will impose on the area a completely new culture and are likely to have an adverse impact on the mixed culture and racial groups who live and/or use the areas involved. The proposals are likely to have a disproportionately adverse impact on the less advantaged communities in West Norwood and the neighbouring areas.</p> <p>2. These developments are likely to favour more advantaged people. A properly conducted study on the social impact is required.</p> <p>3. The proposal for Site 18 will rip much out of the heart of the shopping and other facilities of West Norwood. For example, B&Q is a great resource for the area and Knowles is a thriving social hub.</p> <p>4. The removal of the shops and facilities will require us to travel further afield to access similar facilities. This will have an adverse environmental impact. The move to shop more locally has been a good outcome of the pandemic, but these proposals have the opposite impact.</p> <p>5. The proposals for Site 18 will have a significant adverse impact on the commercial properties which will be left. The high street will suffer serious and lasting damage.</p> <p>6. The mixture of commercial and residential property is an advantage for the area which needs to be recognised and preserved.</p> <p>7. The proposed height of the buildings will impact the privacy of many – with their homes overlooked. People in the vicinity will lose their enjoyment of light – their rights of light.</p> <p>8. The proposals will impose on the area an entirely different landscape of high rise blocks which will be totally alien to the character of the area.</p> <p>9. The proposed buildings will be an eyesore and will be totally out of keeping with the area.</p> <p>10. The proposals will increase the population density significantly and add no facilities to cater for the increase. On the contrary, the developments will not only increase the population density, but will remove facilities which the current residents and users enjoy.</p> <p>11. West Norwood and the neighbouring area is under-resourced for facilities for people as things now stand. The proposals will add to the problem.</p> <p>12. The proposals add nothing to improving the environment but, instead, adversely impact the environment.</p> <p>13. The proposals will significantly increase the car usage in West Norwood which has significant problems as things now stand.</p> <p>14. Car parking in the area is already very badly provided for. Nothing in these proposals adequately deals with this problem. Instead, they add a huge additional requirement for coping with cars.</p> <p>15. The lack of car parking is a problem for the commercial enterprises.</p>	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>The proposals fail to deal with this. It seems the proposers have no interest in businesses thriving in the area, especially small businesses.</p> <p>16. The proposals will disproportionately impact smaller businesses in an adverse way.</p> <p>17. It follows that the way of life of the residents of West Norwood and neighbouring areas and people who use the facilities under threat will be seriously damaged.</p> <p>18. Similarly, the business community of the area will be seriously damaged by the proposals.</p> <p>19. The public consultation has been hopelessly inadequate.</p> <p>20. The plans have been made with wholly insufficient involvement with local people and organisations who have the wellbeing of West Norwood at heart. The local people should be seen as partners in working out what is right and not as obstacles.</p> <p>21. The developments look like earlier ugly developments which are now recognised as planning errors. The proposals would repeat these errors.</p> <p>22. The developments should be made as part of an overall review of West Norwood and the surrounding area which looks at all the issues. Instead, the proposals look very much like plans devised by outside developers and their financiers who are more interested in making money. It has the hallmarks of a grand plan which is to be imposed on an area by outsiders.</p> <p>23. We understand the proposals for Site 18 and Site 19 at and adjacent to the town centre of West Norwood and nearby Tulse Hill are unique to the overall schemes under consultation. No other town centre in Lambeth has been treated this way in the consultation and nor should West Norwood and Tulse Hill.</p> <p>24. It is of serious concern that the Council is even contemplating the proposals for Site 18 and Site 19. There needs to be a review of how the proposals have been allowed to get as far as they have. The process must be, and must seem to be, transparent and open. We await your comments on these observations.</p>	
Individual	R0716	Other	I am a resident of West Norwood and I demand the proposals for site 18 and site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0717	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0718	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>I am very alarmed to find out about the proposals for developing sites 18 and 19 into huge tower blocks. I am also further alarmed that I found out about these devastatingly major changes to the area by chance rather than through being alerted to the proposals in a proper manner via the council asking for comments on the plans.</p> <p>Here are some reasons why I strongly object to these plans in their current form:</p> <p>1) The size of these developments are absolutely huge and completely change the character and population size of the local area. 22 storeys is a massive tower and well out of character with the rest of the area. Even the smaller blocks are still very tall. This would change the character of the area which currently has low-rise buildings and could reverse the development of the high street and influx of professionals into the area over the last decade. Also, the amount of sunlight that these developments would block is dramatic. Living on Harpenden Road (for example), I can see that the towers would cast a long shadow covering many gardens and houses. Also, these towers would mean that all local homes and gardens will be overlooked. Surely this can't be the planning policy that the local council adheres to.</p> <p>2) If there is a plan to use these huge blocks for social housing, I am concerned that the additional costs needed have not been considered or presented. There is research (sources can be supplied if requested) that shows how putting people in high-rise blocks has a negative impact on their mental health. Other problems that increase when packing people in to high-rise blocks is increased alcohol and substance use, crime and violence. Therefore, I would want to know the increased funding for mental health, substance misuse and crime the council is factoring in to these plans. Of course, social housing is needed in the country, but I'm sure we can do better these days than repeating the same mistake of high-rise buildings or densely populated estates that do not provide people with opportunities but instead increase the divide between socio-economic populations.</p> <p>3) I can't see how West Norwood can fit this sudden increase of population. For example, GPs, dentists, etc. Also, parking is already sometimes an issue locally so having potentially hundreds more cars would make it impossible to park anymore.</p> <p>4) When would the buildings be built? Presumably the roads and train lines would be affected which makes me worried that a lot of work will be done at night. This would mean all houses in the local area would have a long time of disturbed nights with noise.</p> <p>So, in summary, I strongly object to this proposal. I would like these sites removed from the Site Allocation Development Plans Draft. I would</p>	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			also like the council to be more transparent with proposals to make such dramatic changes to the area and conduct true consultations. Finally, I don't think these proposals fit with the results of previous community consultations and council's future plans and policies.	
Individual	R0719	Other	Please reconsider the size and scale of the proposed works of Site 18 and Site 19. Even the ridiculous mock-up drawing makes the sheer over-bearing scale of the proposal look completely out of place with the existing surrounding low-rise environment.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0720	Other	I am a resident of West Norwood and I request that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0721	Other	<p>I would like to express my deepest anguish and upset towards the site 18 and 19 plans to build high rise buildings along West Norwood high street and Tulse Hill. As a local resident who is incredibly proud of how West Norwood has created a burgeoning community that is not only cherishing and engaging with the existing community it has also become a desirable place for many families that have moved here as it hasn't been taken over by developers. The low level characteristics of West Norwood we want to cherish and high rise living is proven to not create the positive living being claimed. West Norwood is a great example of how old and new works symbiotically to create a new modern London. This is due to the amazing work of the Norwood action group protecting mindless development to the detriment of local residence. No one wants to prevent positive development and growth but nothing about the plans meet either. The fact that these plans have occurred without the usual consultancy is very distressing and against all the promises we are made by Lambeth council.</p> <p>These plans will single handedly kill our community and take away some of the cherished local shops that serve our community and replacing existing shops with corporate retail brands that are the ones that can only afford what we know will be increased rent. These are shops that have been developed to meet our local needs and carefully curated for all types of residents.</p> <p>More importantly it's displacing and destroying peoples existing housing to be replaced with undesirable high rise living. There is so much evidence to show that it shatters families lives being moved to high rise and makes no sense you're taking away decent housing away to create something worse. No one wants to have another Grenville tower!</p> <p>There is no consideration of this development meeting or working with the net zero target for 2030.</p> <p>Please please remove site 18 and site 19 from the plans or at least do us the decency of consulting with local groups before including so they</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			can see the dire impact it will provide. Do this with humanity and decency. We've been through enough fighting against Southwark metals and the pandemic and just need to be involved to help grow our community and not see it destroyed. I would like to express my deepest anguish and upset towards the site 18 and 19 plans to build high rise buildings along West Norwood high street and Tulse Hill. As a local resident who is incredibly proud of how West Norwood has created a burgeoning community that is not only cherishing and engaging with the existing community it has also become a desirable place for many families that have moved here as it hasn't been taken over by developers. The low level characteristics of West Norwood we want to cherish and high rise living is proven to not create the positive living being claimed. West Norwood is a great example of how old and new works symbiotically to create a new modern London. This is due to the amazing work of the Norwood action group protecting mindless development to the detriment of local residence. No one wants to prevent positive development and growth but nothing about the plans meet either. The fact that these plans have occurred without the usual consultancy is very distressing and against all the promises we are made by Lambeth council. We've been through enough fighting against Southwark metals and the pandemic and just need to be involved to help grow our community and not see it destroyed.	
Individual	R0722	Other	I am shocked and appalled to see the plans for these two developments. These monster buildings will bring traffic chaos, reduced air quality, destruction of wildlife, loss of light, increased pressure on local services and destroy the character of the local area. I am a resident of West Norwood and I demand the proposals for site18 and site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0724	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0726	Other	The proposals I have just seen for the development of Site 18 and 19 in West Norwood are absolutely ludicrous: completely out-of-keeping with the surroundings, destructive to the community and nakedly profit-driven. Furthermore it appears that Lambeth is deliberately attempting to bypass proper consultation with the community it is supposed to represent. If true, this is shameful behaviour. You must withdraw the ridiculous proposals for site 18 and 19 immediately and begin again with proper consultation.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0727	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0729	Other	I am a resident of West Norwood and ask that the plans for site 18 and 19 are removed from this consultation and new plans developed with the local community that better suit the area and do not destroy the heritage and very special community that has taken many years to achieve. And I can not believe that a building of 20 storeys is even being considered to be suitable for the site.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0731	Other	I am a resident of west norwood and I demand that the proposals for Site 18 and Site 19 are removed from this consultation and plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0732	Other	I am a resident of West Norwood and I ask that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0735	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0736	Other	I am a resident of West Norwood /Gipsy Hill and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. There has been no adequate public consultation on these plans. These buildings are too tall and contravene Lambeth's own planning rules. They would be over-dominant in terms of height, bulk, and massing. This development overall would harm local communities and businesses. It would overwhelm the local infrastructure, increase traffic congestion as well as damaging the environment through the destruction of mature tree and uprooting of established eco systems. Lambeth is awash with unnecessary developments like this, which continue make a complete mockery of Lambeth's declaration of a 'climate emergency.' There is a woeful lack of imagination shown in these plans and no vision of a viable town centre for the area. Nor is there any real attempt here to create sustainable buildings or genuine social housing which people on low incomes could afford. I refer to what Lambeth said about our community when the last Master Plan was proposed in 2017: 'It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. Please rethink these terrible proposals, which typically for this borough, would only benefit property developers	
Individual	R0737	Other	I object in the strongest terms to the plans for site 18 between York Hill and Landsdown Hill Site 18 will destroy the character of Norwood High Street being out of scale, too high, too dense and with no reference to the shops and houses on the opposite side of the street. I object to the over development of site 18 which will diminish natural light inside and outside the dwellings meaning residents will have to use more electric lighting at a time when people are encouraged to use less power. Over development of the site will also leave little space for outside amenities or green space for mental and physical health and to absorb rain and avoid excessive surface water run off.. Children need outside play space to play ball games and research shows that anti social behaviour is far less likely in housing developments which provide landscape and a play space where parents can see the children playing from their windows.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0739	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0740	Other	I am writing to oppose Sites 18 and 19 in Lambeth's Site Allocation Development Plan. These are not appropriate for West Norwood and Lambeth needs to sit down with local residents and business owners to come up with a plan that really suits us all.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0741	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0742	Other	I strongly object to the above development site in west Norwood / tulse hill given the poor planning process that has been followed and the extreme negative impact they will have on the high street. These buildings are completely out of keeping with the local housing.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0744	Other	I write to state my objection to the development proposals for Site 18 and Site 19 in West Norwood, and to demand that these be removed from the consultation and that new plans be developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0746	Other	As a long time resident of West Norwood and Lambeth I demand proposals for Site 18 & 19 are removed from this consultation and new	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>plans developed with the local community.</p> <p>West Norwood has changed since we moved here in 1998. It is no longer just an industrial working class area and dumping ground. New shops, restaurants, nature reserves and a diverse community of people of all income levels love the new West Norwood, that continues to blossom in a beautiful way.</p> <p>To not involve this community in such major plans is criminal and reveals the disrespectful disregarding and patronising view held towards the 2022 West Norwood community. It is obvious this decision has been made from afar, not with those who know and live in the area.</p>	
Individual	R0748	Other	<p>I object to the proposed development in west norwood, as I live in the area.</p> <p>I demand the proposal for Site 19 and Site 18 are removed from the consultation and new plans are developed and this time in consultation with the local community. Me and my husband object to the developments happening in West Norwood high street and demand that the proposals for Site 19 and Site 18 are removed from the consultations and new plans developed with the local community.</p> <p>The objections are on the following grounds:</p> <ul style="list-style-type: none"> - no adequate public consultations - destroys the character of the local area - threatens local homes and business with loss of jobs - nothing about Lambeth's net-zero target for 2030 - increased pressure on local services - reduced air quality and traffic chaos - loss of key services and amenities e.g. decent and affordable supermarket with iceland and local business - will reck the skyline <p>We live and work in the local area, on Wolfington Road</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0749	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>I strongly object to the above proposed developments.</p> <p>Both ae totally out of scale with the current look and feel of the area.</p> <p>The height of the towers is excessive, and the redevelopment of West Norwood High Street will destroy the current community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0751	Other	<p>I am a resident of West Norwood in SE London and am writing to express my resistance to the proposed development plans for sites 18 and 19 on West Norwood High Street and Tulse Hill.</p> <p>West Norwood is an active local community. It is a great place to live and we have a strong sense of who we are. Gentrification has not yet driven out those on lower incomes. There is real mix of people living</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>here in terms of cultural and financial backgrounds and that is exactly the sort of atmosphere where I wanted to raise my young family. Our high street is a key part of that community. In a world where we desperately need to reduce petrol consumption we can walk to but a pot of paint, to get a picture framed, or to have a decent haircut. We believe that those shops placed under enforced purchase orders will struggle to return as rents increase with the new development. That will rob our community of so many of the specialist retailers who are at the heart of our community.</p> <p>The development proposed for sites 18 and 19 will completely change the skyline, the high street and the feel of the local area. It's not that we are resistant to change. The presence of the revamped library and cinema has been hugely positive for the area and we know that more housing (including social housing and affordable housing) is much needed. But the proposed development (about which there has been virtually no consultation) is not the answer. There is plenty of evidence to suggest that rise accommodation does not make for robust, healthy and happy communities. We would rather see an incremental development that provides more desirable housing in keeping with the existing locale, and one which is negotiated with the local community rather than parachuted in wholesale without any meaningful consultation. There are established channels through which such consultation might be conducted with an active community led volunteer let Neighbourhood Planning Assembly already in place. We are not suggesting a cessation of all development; quite the contrary, we recognise that there is a need to do something positive with the derelict land behind the Texaco Garage and we welcome investment in the local area. What we are asking for is time to explore options that work for us as a local community.</p> <p>I would therefore ask that you remove site 18 and site 19 from the plans and take the time to engage in meaningful consultancy with local groups before suggesting an alternative. No other area in the Lambeth Site Allocation Development Plans is seeing proposals of this magnitude so this requires more time and a different approach.</p>	
Individual	R0752	Other	<p>Please remove this application and then have an open discussion with local business and residents as to what would best enhance West Norwood.</p> <p>This over development will Overwhelm our already over stretched Services and be detrimental to the quality of life to current residents.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0753	Other	<p>I'm writing to raise my objection to the plans laid out for Site 18 and 19 in West Norwood.</p> <p>These plans will dramatically alter the character of West Norwood. I'm</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			very against a new tower block, higher than anything south of Vauxhall being developed in our small town centre. I'm calling for these plans to be scrapped with new plans developed with adequate public consultation.	
Individual	R0757	Other	<p>I am writing to strongly request the removal of sites 18 and 19 from the current consultation.</p> <p>There has been no meaningful consultation with local stakeholders and residents. The plans for West Norwood will have a major impact on the special nature of the town centre. This requires a different and more comprehensive consultation process.</p> <p>No other Lambeth town centre is affected in the same way, and no other sites include recommendations for tall buildings.</p> <p>The current approach ignores community consultation and contradicts the principles of collaboration set out in the 2017 Masterplan.</p> <p>For all these reasons a different approach must be taken for development plans for West Norwood. As many people discover, West Norwood is a pleasant place to live and create a good life for oneself and, if one chooses, bring up a family. It is a place in which many different people — from different ethnicities, social classes, sexualities, educational backgrounds, employment sectors — find themselves at home.</p> <p>One principal reason for this is the built environment and the sense of place that creates. At first sight, West Norwood may seem undistinguished and rather scrappy. But these low-rise buildings house a lively collection of small businesses, including retail, with hardly any chain stores. Within a few hundred metres you can visit get virtually everything you need: meat and fish, household goods, health products and prescriptions, fruit and veg, spices and products from all over the world, bread and cakes, small-scale furniture, DIY materials, paint, stationery, greetings cards. There is a post office, opticians, doctors, charity shops, library, cinema, coffee shops, several small restaurants/take-aways, places of worship.</p> <p>All these provide vital services, especially for the large number of people who rely on being able to walk to their town centre. Many local people cannot afford a car or, for medical or age-related reasons, no longer drive one. And, very important now that we are urged to shop local, these are virtually all independent businesses: not overpriced chi-chi stores as in Battersea or Clapham, but genuine businesses with keenly priced goods. There are also plenty of essential “dirty” businesses, eg car repair workshops,.</p> <p>Some years ago, at a Lambeth consultation for the 2017 Masterplan, I talked to one of the planners on duty. His comment was that West</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Norwood already has the sort of townscape and town amenities that his consultancy tries to recreate elsewhere. So why destroy them, as this plan proposes?</p> <p>The recent economic and retail statistics produced by Street to Street demonstrate that West Norwood is relatively thriving despite the pandemic.</p> <p>In short, West Norwood works.</p> <p>Consultation</p> <p>There has been no meaningful consultation with local residents. This is contrary to the branding of Lambeth as a “co-operative Council” and more importantly contrary to the spirit of the age, which requires local people anywhere to be meaningfully involved in consultation about changes to their local area. In making this point, I am not referring to the specifics of the plans for these sites. This is a generally accepted principle that has been ignored in the development of these plans.</p> <p>Disproportionate scale</p> <p>The proposed development does not reflect the small-scale nature of West Norwood (see above) and its special qualities as an area to live and work. West Norwood needs to have incremental development through sympathetic architecture, not standardised development architecture that will make the place look like everywhere else.</p> <p>Local housing need</p> <p>There is a demonstrable need for more housing in the area. This plan would provide more high-priced accommodation for single people or couples — but what is needed is family housing. Whether renters or owner-occupiers, many people are having to move out of West Norwood, an area they love, as their family expands because suitably sized accommodation is too highly priced. This denudes the area of potential long-term residents — the people who make for a balanced community and become the volunteers of the future as they grow older. A community made up of young people in their 20s and early 30s and people in their 60s and 70s is not a balanced community.</p> <p>For all these reasons, and many more, these proposals should be dismissed. Planners should return to the drawing-board but only in meaningful partnership with all stakeholders and residents of West Norwood.</p>	
Individual	R0758	Other	<p>I am a local resident in West Norwood and I cannot believe that you are proposing a 12 storey buildings on these sites.</p> <p>Please remove the current proposals for Site18 and Site19 from this consultation and develop new sensible plans for our local community.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0760	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0760	Site Allocation Policy	<p>With response to the Site Allocation Policy section of the consultation for Site 18 in West Norwood I'd like to make the following points:</p> <ol style="list-style-type: none"> 1. Where is the data to support the statements within 'Land uses'? How has this figure of 390-470 residential units been calculated given the height of the proposed blocks exceed Lambeths own criteria in the Lambeth Local Plan 2021. Is this figure only attainable if the developer breaks the LLP criteria? 2. 5000-7000 sqm of commercial/community floorspace. Where is the data to back this up. How have future retail needs and trends been assessed ensure that this amount is viable so we don't end up with many empty lots. 3. Where has the figure of 50% of units in shop use come from? What is the criteria on which this assumption has been made? 4. How has the existing commercial business in West Norwood space been taken into account to ensure that this development doesn't simply create dead areas in other parts of the town centre? 5. Affordable Housing. What criteria and calculations have been made to ensure that the development could actually deliver 35-50% threshold? Other new developments throughout London regularly downgrade this allocation percentage in order to make the scheme viable. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R0760	Site Allocation Policy	<ol style="list-style-type: none"> 6. How will Lambeth ensure that the social and affordable housing units are of a size not less than the private units? It has been a feature of other housing development schemes that the social units have been allocated a much smaller sqm percentage. 7. Social Infrastructure. What data has been used to assess capacity in current social infrastructure with regard to schools, doctors surgeries, etc. 8. Heritage Assets: What criteria is being used to 'enhance the significance' of heritage assets? How will any design work with and complement existing buildings? 9. Building heights. The consultation document states that part of the site is 'appropriate for a tall building height of 36m'. Given that the maximum height of any building in the south of the borough under the Lambeth Local Plan 2021 is 25m, how has this figure of 36m been arrived at? By its own admission the document states that this figure exceeds the threshold definition of tall buildings. How is it possible that a building of this size could make it into the scheme, given that it openly acknowledges it is contravening Lambeths own rules? 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			10. Other building heights. The indicative drawings clearly show that buildings of up to 21m would dwarf the existing buildings along Norwood Road, even if they are set back.	
Individual	R0760	Site Allocation Policy	<p>11. 'No harm to views affecting heritage assets' It is extremely difficult from the indicative outlines how this could be achieved.</p> <p>12. 'Respect context and create a balanced townscape with the Victorian frontage opposite'. The outline diagrams clearly show that 4-6 storey buildings of the size along the front would totally dominate and tower over the buildings opposite.</p> <p>13. Activate ground floor uses and key routes through the site'. How would this be achieved given the density of proposed buildings?</p> <p>14. Provide a varied roofscape'. How would this be achieved?, especially if the financial viability only allows for one principal developer? How could the site be split up into plots so that different architects and developers could ensure variety of shape and form?</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0760	Site Allocation Policy	<p>15. Transport, movement and public realm. There is no proposal for any residents or public parking. How does this fit in with providing ev charge points for new buildings? What measure are being suggested to minimise displacement parking into already congested neighbouring roads?</p> <p>16. If this new public space is to 'provide a focal point for the town centre' how will placing it next to the largest buildings ensure there is enough light and rain to support a harmonious green public space?</p> <p>17. Neighbour relationships. How will tall buildings of 6-12 storeys not impact upon the existing buildings adjacent to the site given they will be looking directly at each other, and will absolutely overshadow them?</p> <p>18. Energy and sustainability. The consultation says that 'every effort should be made to maximise contribution towards achieving net zero emissions'. Given Norwoods ambition to be net zero by 2030, this should be a commitment rather than wishful thinking. There is a lot of green-washing here. A development for the 21st century of this scale and size should be laying down clear non-negotiables when it comes to energy, sustainability and climate change issues. Why are these not built into the scheme as primary objectives? Why is this massive housing project not being designed to be 100% energy efficient when the technology and expertise exists to do so? This section of the consultation lays bare the shocking lack of future ambition for the project.</p> <p>19. Air Quality. The consultation simply says that air quality be 'addressed'. This is weak. It should be a primary objective of any such scheme to have a non-negotiable commitment to reducing potential pollution, whether that be through heating and lighting systems or</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			vehicle use. 20. Access to urban space – development should address existing open space deficiency. How is this going to be achieved given the density of building that is being proposed?	
Individual	R0760	Vision Map	With response to the Vision Map section of the consultation for Site 18 in West Norwood I'd like to make the following points: The map demonstrates that the 81m AOD building in the middle will clearly tower above even the highest local buildings of the York Hill estate which sit in an elevated position on York Hill. As such this diagram show how inappropriate a tower of this height would be. The proposed 81mAOD high tower would stand less than 40m away from the existing buildings/shops opposite on Norwood Road that are only 55m AOD high. The new tower would dwarf these businesses.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0760	Context	With response to the Context section of the consultation for Site 18 in West Norwood I'd like to make the following points: 1. Land Ownership. How many different landowners currently own the various site plots? Would the necessary CPO's make the site viable? 2. Existing land uses. How many of the tenants/shops/church and businesses have been consulted? How many of the current council tenants would be allocated new homes within any new development? How would the development ensure that businesses would not be lost for good in the area given the inevitable years of building works? 3. Local Plan Place and Neighbourhood Policy. This section leads to the recently adopted Local Plan. PN7A states that 'Development in the area will need to be of a scale and form related and appropriate to its context'. How does breaking the threshold for building heights in this proposal fit in with the Local Plan? PN7B All ground floor units should be in active frontage and no fewer than 50% of ground floor units are to be in shop use. What data and evidence is used to support these requirements? PN7E increase green infrastructure, improve access to open space and improve air quality'. What specifics are going to be applied to this Site 18 proposal. How will you improve air quality and by how much with regard to WHO guidelines. How will you increase green structure given the site size and the number of housing units that are being proposed. The two are incompatible. Tower blocks are notoriously environmentally unfriendly and historically contribute more greenhouse gases in their construction. To what standards will any new development hold eg Passive Haus? 4. Neighbourhood Development Plan. The Norwood Planning Assembly (NPA) has been working on a specific Neighbourhood Plan for this site. Why has this new proposal not referenced all the work already carried	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>out and taken heed of the community discussions that have been taking place over the last 15 years?</p> <p>5. Views. The context document states there are no strategic views. The proposed massing and heights will mean that this development will totally dominate the views from all around and be visible from all around.</p> <p>6. Access to open space and nature conservation. The proposal accepts that there is a deficiency of open space. However the proposed massing means that any open space on the new development will be limited including any new public square.</p> <p>7. Neighbour Context: The proposed 11-12 storey block will be less than 40m away from 3-4 storey residential units on Norwood Rd. The maisonettes are 2 storeys and the York Hill estate a maximum of 5 storeys. The proposed block is between 50-66% higher than any of the existing buildings. This clearly demonstrates how inappropriate the new proposal is.</p>	
Individual	R0760	Evidence	<p>Section 1.3 The SADPD assumes that the site will be comprehensively developed. This assumes that the existing Victorian shop fronts would have to go.</p> <p>Section 1.4 Refers to the Local Plan in how it approached massing. It doesn't explain why or how the LLP has been breached with regard to building heights.</p> <p>Section 3.1. Key principles With each of these principles there is an unresolved tension between the bulk and scale of the buildings with the objectives of creating wider pavements, improved permeability, safe spaces and through routes.</p> <p>Section 4.1 and 4.2. The commercial space indicates clearly that on the ground floor we could expect 4 massive blocks and a very small public space. This is not the size and stature of a town square as all the other previous consultations have alluded to. This is simply a small space with a few trees that might house one of two benches. It is not the open focal point and meeting space that is required for a town centre.</p> <p>Figure 14 and 17. How is it possible to have a 12 storey block that towers above everything be described as 'discretely located' and 'respects the high street scale'? This building would be 66% higher than the existing buildings along Norwood Road and would be visible from practically every angle. This is how it would 'help wayfinding'.</p> <p>Section 5.1 The document states that the development should not be 'unduly dominant in its context'. It is hard to reconcile this given the scale of the buildings in relation to the existing building lines. A development on this scale for a town centre would totally dominate the townscape.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Section 5.3. The height and massing. Policy Q26 of the Lambeth Local Plan makes it clear that the threshold for tall buildings in this area is 25m. The proposal contains indicative proposals for 36m, an increase of 50% above the maximum. It is therefore inexplicable that the SADPD has accepted this height as a possibility.</p> <p>Section 6.1. The document states that the centre of the site can accommodate a degree of height -c36m despite acknowledging elsewhere that this height is way above the threshold for acceptable building heights in the part of the borough (LLP2021). How could this conclusion have been reached?</p> <p>The indicative images do not take into account the proposed development at Knollys Yard. Both have a bearing on the impact of West Norwood.</p>	
Individual	R0760	Sustainability Appraisal	<p>With response to the Sustainability Appraisal section of the consultation for Site 18 in West Norwood I'd like to make the following points and ask you to address them:</p> <ol style="list-style-type: none"> 1. How will the affordable housing threshold be achieved? How will Lambeth ensure that financial viability of the development does not compromise the 35-50%? 2. How does the 70% low cost social rent and 30% intermediate housing work with the financial viability of the project? 3. Flexible workspace for creative businesses and commercial space. How has demand for these spaces been calculated and how does the development ensure that these are still going to be viable workspaces in 50 years time? 4. What structures will be in place to encourage training for local people within the creative and digital workspace? 5. Community floorspace – 'existing church will have opportunity to remain on site'. How has community floorspace been calculated given all the other space requirements on the site such as housing units? 6. Development will be car free. How will this development ensure that disabled and physically challenged people do actually have 'improved accessibility'? 7. Local Plan Policies apply. How does this fit in with the proposed breaking the threshold height limits as specified within the Local Plan? 8. 'Site specific design principles will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment'. This is a very poor quality threshold statement that basically says whatever is built will be at least better than the brownfield site it replaces. Lambeth have long viewed West Norwood and Tulse Hill as run down areas of low expectations. The design of even the most modern buildings reflect this attitude. 2 Thurlow Park Rd built in 2021 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>was designed by a very good architect yet is is boring, monolithic and ugly. It could never have been built in a more affluent area. It typifies the current thinking within Lambeth planning. Nowhere has the council insisted on a standard of design that lifts the area, or raises the bar. When redesigning a brand new town centre we cannot settle for this low level standard of architecture. Einstein said that you cannot solve problems at the same level of thinking as that which created the problems. We cannot lift the area and have a town centre that is world class if we carry on doing the same old poor quality designs.</p> <p>9. 'The site is considered suitable for a tall building' How is this statement possible given it significantly exceeds the height threshold in the Local Plan? 'Design principles related to height are included in the policy'. Which policy does this statement refer to? How can Lambeth say that the proposal adheres to current policy when it blatantly flaunts the Local Plan?</p> <p>10. How are neighbour relationships being acknowledged when 80 people are losing their homes, and the proposed block will overshadow every single building in the area?</p>	
Individual	R0763	Other	I am a resident of West Norwood and I request that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0764	Other	<p>As a Tulse Hill resident, I am writing to object to the proposals for site 18, on two main grounds:</p> <ul style="list-style-type: none"> • There is no real vision for the site, only a collection of buzz words with minimal substance. In particular, there is no focus on what should be the main issue - the need to upgrade Norwood Road as a decent shopping centre. The street's facilities are heavily used by those in the neighbourhood but it is frankly run down and needs substantial refurbishment and improvement. The references to shops and other services in the proposals are cursory and thin - not promising more than 50% shop frontage - and have not been developed in the context of the street as a whole. Instead, the starting point seems to be that this is a site with potential for redevelopment which could help Lambeth meet its housing targets and get some CIL contributions, whatever the impact on the neighbourhood. • This is demonstrated, and aggravated, by the cavalier attitude to tall buildings. They would clearly be quite out of place on this site and out of keeping with the local environment, yet the proposals not only envisage that the borough's general approach of limiting developments to less than 25m can be ignored, but specifically refers to a tower 36m high. None of this makes any sense in a local context and it can only be explained by the wish to maximise the number of housing units, putting 	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			more pressure on local services, without offering any corresponding improvement in the services themselves. In short, the planners need to go back to the drawing board and start thinking seriously about opportunities for improving the neighbourhood, rather than just aiming at box-ticking and income generation.	
Individual	R0768	Other	My objections <ul style="list-style-type: none"> • Hardly any meaningful consultations and no local community involvement whatsoever. • Where can large scale models be viewed? I have seen nothing in 3-D. • Both these developments will have a hugely significant effect on the livelihoods and well-being of local residents. • (I have lived at [address redacted] 37 year and prior to that at Lavengro Road, SE27 for 7 years) • Huge pressure on parking , and increased traffic chaos • Destruction of wildlife and trees • No reference to Lambeth's net zero target for 2030 • Although there is a need for more housing across the country, however in a densely populated area such as this, such a huge scale change is inappropriate. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R0769	Other	I am a West Norwood resident and I demand that the proposals for Site 18 and Site 19 are removed from the consultation and new plans are developed in consultation with the local community. The current plans bear no relation to the local plan consulted on and agreed with NAG and the Norwood planning group a few years ago, in particular with regard to the height of any new development in the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0770	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0773	Other	I'm a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0775	Other	I nor any of my neighbours have received any notification concerning these proposed Sites 18 and 19. We only found out 20/02/2022 from another neighbour delivering leaflets about how you will allow basically wipe West Norwood of the face of the earth. I am disgusted and concerned that you would treat residents in this way as it makes me wonder what other shady deals you have with others you have accepted with any proper consultations - is this even allowed? I doubt anyone said yes unless there is something it for them as WEST NOWOOD SAYS NO! You're just displacing more locals and "the poor" further and further away from London and those who can't make lives unaffordable and live life. Even though you need us to serve you.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Also, isn't this a Labour area? Is this something an MP could stop - if it is then what is the point of you? WE SAY NO.	
Individual	R0776	Other	I have only yesterday been made aware of the plans for a monster development in West Norwood where I have lived for many years. Where is the infrastructure for such a plan? A large number of people would have to be accommodated in this already very crowded area. Shops are to be destroyed resulting in many people taking to their cars instead of being able to walk to local shops. Doctors are already under huge pressure and schools are full. Increased traffic will bring jams and increase pollution. There has been no consultation with the public about these plans and I would request in the strongest possible way that the proposals for Site 19 and Site18 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0778	Other	I have lived in Lambeth for over 20 years and I demand that proposals for site18 and site19 are removed from the consultation and new plans developed with the community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0779	Other	I object to the proposal for Site 18 and 19 and demand a public consultation. Site 18 will ruin a the community asses of local business and shops. The recent major road works in the road had a effect on the business and this new development will kill the area completely. Instead of encouraging people to buy and shop local people will go else were. The height of the development is not in keeping with any of the other buildings in the area and will over power the whole area. West Norwood is a vibrant area with a growing sense of community with a library, leisure centre and cinema. Many cafes are expanding but this development will put everything on hold. No new business will think to expand while more than half of the High Street is flux because of compulsory purchase of other businesses. Lambeth should put both sites 18 and 19 up to public consultations.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0780	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0783	Other	I am a resident of West Norwood, Harpenden Road, and I demand the proposals for site 18 and site 19 are removed from this consultation, and that stronger and fit for purpose plans are developed with the local community. I am not against the development of West Norwood at all, but I have significant and strong objections with the plans as proposed, which are in violation of LBL's own planning policy, are totally at odds with the	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			history, heritage and character of the area, as well as damaging to established local businesses and communities. I am quite puzzled that these have been put forward in the first place.	
Individual	R0784	Other	Could more extensive discussions with the local community be conducted before these sites have permission to go ahead?	Please refer to the general response to representations made by individuals and businesses.
Individual	R0786	Other	As a local resident I object to the vast development plans for site 18 and site 19! I demand the proposals are removed from consultation and new plans are developed with the local community. Do not destroy our neighbourly community and threaten our thriving independent businesses with the ugly monster development planned in West Norwood which would bring higher vacancy rates. We want local homes and businesses for local people that are designed in collaboration with the local people!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0788	Other	We strongly oppose these two proposals. There has been no meaningful consultation. The destruction of our high street threatens to destroy our local businesses and homes. The proposal runs completely against the "Station to Station" business development programme to support local businesses. Site 18 would see many of them destroyed. This will have a catastrophic effect on local amenities. We have lived in the area for over 20 years and can currently walk to all our services. This will not be possible after this development; being forced to use our car runs contrary to Lambeth's promotion of Quietways and other traffic reduction schemes. Developments of this size need to be carefully integrated with the existing infrastructure. Both proposals appear to have been developed with no forethought or care for the existing settings. Where is the infrastructure for all the thousands of new people? What about the effects on health, well being and the ability to enjoy and use their community on all local residents while the destruction is going on? It is unthinkable, and we urge Lambeth to think again, consult and comply with existing planning rules concerning density, impact, necessity and disturbance.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0789	Other	We were shocked to discover the plans for Site 18 & 19. The proposed development has been devised with no thought for the local community. West Norwood is a thriving area of Lambeth and the high street is the centre of it. The development proposes to remove local businesses that are vital to the people living in West Norwood. We have a strong identity that blends independent business with residential accommodation and we have reached this position organically. Nothing in these development proposals puts sufficient value on the sense of place that already exists. The idea of an eleven storey tower is ludicrous and would not only	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			destroy the character of the area and be completely out of place when considering the visual skyline but also affect businesses and local housing by destroying wildlife and protected trees and cause loss of light in the area. As residents of West Norwood we ask that the current plans be removed and new plans be developed with the local community.	
Individual	R0790	Other	Please register my objection to the construction of this site.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0791	Other	I object to these vast developments! I demand that the proposals for Site 18 and Site 19 are removed from consultation and that new plans are developed fully with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0792	Other	As a local resident I, along with many others, have strong reservations with regard to the plans we are hearing about relating to Site 18 + Site 19. As I understand it the proposals for Site 18 + Site 19 would mean: <ul style="list-style-type: none"> • a building 22 storeys high (post - Grenfell?!?); • the loss of local businesses - and jobs - and therefore the viability of our high street; • even more traffic congestion, reduced air quality, lack of parking in the area; • increased pressure on local services. There has been virtually no public discussion so proposals for Site 18 + 19 should be removed from this consultation until new plans can be developed with input from the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0793	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community. The proposed high rise buildings are completely out of character with the existing area and will have a negative impact on the high road and local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0796	Other	I am a resident of West Norwood and I am extremely concerned about the proposals for Site 18 and Site 19 which will significantly disrupt the character and utility of our high street. These plans appear to be out of sync with what would constitute a vibrant, valuable and balanced neighborhood, they would reduce the facilitates and utility of the local area and lead of significantly increased pressure on transport networks, traffic and spaces for local business and services in this area. As a resident with young children at school in this area, my family and I are invested in, contribute to and care greatly about West Norwood, I demand that the proposals for Site 18 and Site 19 be removed from this consultation and that new plans are developed together with the local	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			community. New plans need to fit with the long term interests of this community, have proper consideration for Net Zero targets and a have a vision for how this town center can evolve in a viable way for residence and business from now to 2050 and beyond.	
Individual	R0797	Other	I would like to strongly oppose the proposals for the above developments and ask that new plans are developed within the local community. Site 18. There has been no adequate consultation with the public. Local homes are businesses are threatened. The 9 flats above and behind Iceland are only a few years old. How wasteful to destroy them in order to widen the pavement! The plans totally destroys the character of the local area. The 11 Story tower breaks Lambeth own planning rules.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0798	Other	I am writing to express my deep concern about the proposed plans to develop Site 18 and Site 19 in West Norwood. The proposed plans will completely change the character of the high street from a low level community into a high rise estate of new buildings that will drastically alter the sky line and also result in a loss of light. The plans will also reduce the number of retail outlets for those of us who want to shop locally as part of our contribution to combat climate change. This is a huge development and I am shocked that the first I have heard about it is via other residents. This suggests that there has been no real attempt to consult those of us most affected by the proposal. I wonder also if the Council had thought of different ways of achieving its objectives. If so, I haven't seen them. This appears to me an attempt to force through major changes to my neighbourhood without effectively consulting me or other residents. Please withdraw the proposed plans and first consult with those of us who will have to live with the consequences. Thanks.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0799	Other	As a Lambeth and West Norwood resident, I strongly object to the proposed plans for Sites 18 and 19 in West Norwood. Both developments are huge, imposing and will destroy the character of the local area. I feel that these proposals are being brought in by stealth without allowing for adequate consultation of the residents and locals who will be affected by them. Please reconsider this decision and replace the plans with something that will be more in character with the area and will not have a strong negative impact on the people living nearby.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0800	Other	I object to this proposed development in West Norwood. Please remove the proposals for Site 18 and 19 from the consultation process and	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			discuss new plans with the community who will be directly affected by this ridiculous overcrowding.	
Individual	R0801	Other	<p>I would like to proposals for both Site 18 and 19 to be removed from the current consultation. For both I strongly believe that there has been insufficient consultation with the local community in general and the appropriate stakeholders, particularly in view of the scale of both projects in a relatively small area and town centre.</p> <p>I have lived in the centre of this area for 32 years and seen it grow into a caring and welcoming inclusive community with many support groups and centres as well as hardworking small businesses - their views must be respected . Your proposals need full discussion , especially to ensure that existing resources (GPs, schools, parking etc) are not overwhelmed and.also that any proposed housing would be affordable (I am concerned that the 22 storey block at Site 19 would be highly desirable to private buyers that could afford those properties in view of the spectacular views afforded by its position.)</p> <p>Thank you for the opportunity of expressing my views,</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0802	Other	<p>I am writing to raise my objection to proposals for site 18 and site 19. I demand that they are properly consulted on with the local community and Norwood Forum.</p> <p>These proposals are immensely HUGE IN BULK and would totally destroy the character of the area of West Norwood.</p> <p>Site 18 proposes replacing half the high street with 14 blocks of flats between 5 and 12 storeys high!!! The high street is mainly Victorian shops of only 2 or 3 storeys.</p> <p>These proposals are so overbearing and unsympathetic. They need to be looked at separately and not be lumped in with a bunch of other plans for Lambeth. We need proper consultation with those who actually live in the area.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0803	Other	<p>Sites 18 and 19 should be removed from the current consultation. Sites 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill. There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact. This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation.</p> <p>Construction Traffic and traffic in general - the high street is already a very congested road and the new proposals will impact that even more not just during construction, which is a big concern, but also once these multi-storeyed buildings are occupied.</p> <p>For 12 months now I have an ongoing enquiry with Lambeth because of</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>cracks in the road on Knights Hill that have not been repaired, the busy bus route in this area makes my flat shake every time a bus or heavy vehicle travels across this section of road, bringing in construction vehicles and an increase in traffic will impact further on this. Aside from my issues the high street is not in any condition for the current level of traffic not to mind what it will need to endure if these proposals go ahead.</p> <p>West Norwood high street has a great community and part of that are our independent retailers, with low vacancy rates, a construction of this sort will impact massively on these businesses. Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development. B&Q is an essential resource in West Norwood, there is no specific proposal to retain this important business along with its essential parking - that is also an important asset for the rest of the West Norwood shopping area.</p> <p>Thank you for taking the time to review my objections to these proposals and for considering my concerns.</p>	
Individual	R0805	Other	<p>I have real concerns of the proposed development and the impact to the local area. My main points are:</p> <p>Site 18 - West Norwood</p> <p>1/ really doesn't fit with the local architecture, there is a long history of buildings the new infrastructure will look out of place with a modern build</p> <p>2/ Impact to transport, West Norwood, has numerous major bus routes into the centre of London, these will no doubt will be affected. There are already consistent queues on Knights Hill coming into the high street these will no doubt continue and become a normality with the building work and will impact school and business commuters with delays</p> <p>3/ Impact length of time to build, the noise pollution will be felt for mostly likely a year or more, There will be severe impact on the local roads to Norwood Road from construction traffic, during rush hours there are already queues on the main high street, and would the business and shops close during the build, would these be moved elsewhere?</p> <p>4/ No new parking, there is very little designated parking for visitors and shoppers to the area, meaning they would need to park on already crowded residential streets.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0807	Other	<p>I wish to object to the west Norwood development of site number 18 and 19.</p> <p>The buildings are absolutely huge and would impact on the West Norwood and Tulse Hill area.</p> <p>It will also impact on the daylight and sunlight of hundreds of existing</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			homes and gardens and our wildlife. Social impact on the neighbourhood. Impact on Transport and traffic. Economic impact. Environmental impact. Please do not allow this development to happen in our lovely area.	
Individual	R0809	Other	I am writing to you about the Lambeth Site Allocation Development Plans for Sites 18 and 19. I believe that these should be removed from the current consultation and be subject to a more detailed best practice community consultation. If implemented these plans will have a big impact on people who live and do business in the area. Residents are concerned about changes in the character of the area; business owners about the loss of footfall that would occur when so many larger and smaller stores are closed at once. I think it's clear that the plans for site 18 are potentially too high-rise; the plans for site 19 are most definitely so. Pressing ahead with these plans in the current manner will show a lack of willingness to work in partnership with the community and will create cynicism and disappointment.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0813	Other	I refer to the plans at York Hill estate. Am opposed to a development of this scale in a residential neighbourhood. Traffic in this area is already terrible, Knollys Road virtually unpassable most days. You have created several ridiculous LTNs in the borough but want to allow this forward. A Joke! How is this compatible with net zero target for 2030. Also my own very small development at [address redacted] (for badly needed additional residential accommodation has been refused several times). How can this be consistent with a development on this scale without any public consultation. So in summary opposed on several planning grounds	Please refer to the general response to representations made by individuals and businesses.
Individual	R0814	Other	We received a leaflet through our door from the Norwood Forum giving details of the proposals for these sites. It is urging us to oppose these proposals. We are not in a position to either support or oppose your plans because, as far as we can recall, we have not received any details about them or been asked for our views. We feel we ought to have the opportunity to comment as Norwood Road is our nearest shopping area. Could you please advise us of what consultation has already OR is intended to take place on these plans?	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0815	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0817	Other	<p>I have only recently learned about these sites and seen the proposed development plans for them. Both sites (18 and 19) should be removed from this consultation and new plans developed with the participation of the local community, including in particular the key stakeholder groups. I object to the Lambeth planning proposals for site 18 mainly on the following grounds:</p> <ul style="list-style-type: none"> *. Inadequate consultation with the local community. *. Height and scale of proposed buildings - the buildings, especially on site 18, are far too tall and too massive for the neighbourhood and clash horribly with the other shops and housing in the area. *. Climate change/standards - all the buildings should be in line with Passivhaus standards, as used in Norwich and recently in Camden, enabling residents to reduce energy use and builders to minimise carbon use in their construction. *. Modern - the proposals look back to the 20th century. They should look forward, in line with the latest mid-21st century ideas about integrating living, shopping, working and socialising. Lambeth needs to look forwards, not back to the Age of the Dinosaurs, certainly where building design and scale are concerned. * Affordable housing: in particular, Lambeth should hold firmly to the aim of 70% of new housing being genuinely affordable; it must not be drawn into accepting a sizeable reduction in this percentage in negotiations with builders. This would show that, contrary to the perception of many Lambeth voters, it is serious about helping local people. *. Green: the Green Party now forms the official opposition in Lambeth; Green policies must be taken seriously into account when drawing up new building proposals, otherwise democracy suffers. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R0819	Other	<p>We would like to request the removal of the plans for Site 18 and 19 from the consultation and for new plans to be developed with community input.</p> <p>There has been no adequate public consultation and these huge blocks are not suitable for a low-rise suburban residential area.</p> <p>I can only imagine the chaos, disruption and environmental toll caused by construction over 15 years.</p> <p>Please rethink these proposals.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0820	Other	I am a resident of West Norwood and I demand that the proposals for Site 18 be removed from this consultation and new plans be developed with the Community. I am a resident of West Norwood and I am writing to object to the plans for Site 18 for reasons set out below:	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Site 18</p> <ol style="list-style-type: none"> 1. the consultation period has been much too short; but not only that, there has not been any adequate public consultation about this proposed development. 2. this development threatens homes and businesses in the area. It is not at all clear that affected businesses will be able to return. 3. the plan for high rise development will destroy the character of the local area. 4. there's no mention of Lambeth's Net-Zero target for 2030. 5. this is not a vision for a town centre fit for 2050 and beyond. <p>I urge the Council to remove the proposals for Site 18 and Site 19 from this consultation and new plans developed with the local community.</p>	
Individual	R0822	Other	<p>I would kindly like to reject the option of closing shops such as Iceland and the butchers to build flats on behalf of my mother and I. These amenities are very much needed and allow my mother who doesn't drive; to be able to be independent and walk to the local shops with her trolley and pick up her shopping. West Norwood needs these shops and it would be devastating to lose them and have a great impact on the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0824	Other	<p>I am a resident of West Norwood and I'd like to insist that the proposals for Site 18 and Site 19 are removed from this consultation and new plans are developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0825	Other	<p>I demand the proposals for Site 18 and Site 19 in West Norwood are removed from this consultation.</p> <p>The proposed plans for these two sites will cause a major change in the dynamics and character of the local area and community. Any new plans of this scale need far more involvement and engagement from the community, so that the local people can understand fully what they are and what longer term impact they will have. I feel that local people have not had sufficient time to be consulted fully and ask that any new plans of this magnitude need to be developed with them and with the established forums and community groups, etc that represent the local community already.</p> <p>I have lived in the area for over 25 years and use the West Norwood shops on a daily basis. As a full time carer with limited free time, I prefer to use the independent and chain shops in West Norwood High Street, which I can walk to. This enables me to exercise while picking up shopping. To lose these well established and well used shops would be devastating. Additionally, if there are plans to bring in so many new residential properties, surely there will be a need for more useful commercial properties not less? Also, other amenities will be needed for a development of this scale to support any new local housing.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0826	Other	<p>We've lived just off Norwood High Street and in the surrounding area for nearly a quarter century and are now immensely attached to it. We remember when the area's 'West Nowhere' nickname was somewhat appropriate and for us it's transformation over the past couple of decades has been quite astounding. We recognise that site 18 could be greatly improved and have been following the progress of the Lambeth Local Plan. But what attracted us to the area 25 years ago was that at its heart there were these small independent shops and pubs that had character and brought with them a real sense of community. We got to know people through the high street and became wedded to the area as a result. Amongst others on the high street this morning I've spoken with people in the bakery, chemist and pet shops. Linda, Ross and Tina on the fruit and veg stall sent me on my way with a jam donut of all things. We've known them for the entirety of our time here. Once they offered to put us up when we were between properties. And they properly stepped up to the mark for everyone here during the worst of the pandemic. This is an example of what we hold dear and we're afraid that your plans for site 18 would seem to obliterate approximately half that. We fear that once site 18 was cleared, what would be left of the old high street might not fare very well in the face of it and then West Norwood, as a coherent community, is lost.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0827	Other	<p>I am a resident of SE19 and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. Not enough public consultation on these plans has taken place. These buildings are too tall and contravene Lambeth's own planning rules. They would be over-dominant in terms of height, bulk, and massing. This development overall would harm local communities and businesses. It would overwhelm the local infrastructure, increase traffic congestion as well as damaging the environment through the destruction of mature tree and uprooting of established eco systems. Lambeth is awash with unnecessary developments like this, which continue make a complete mockery of Lambeth's declaration of a 'climate emergency.' There is a woeful lack of imagination shown in these plans and no vision of a viable town centre for the area. Nor is there any real attempt here to create sustainable buildings or genuine social housing which people on low incomes could afford. I refer to what Lambeth said about our community when the last Master Plan was proposed in 2017: 'It is vital that principles of collective action, collaboration and</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. Please rethink these terrible proposals, which typically for this borough, would only benefit property developers.	
Individual	R0831	Other	We are writing to object to the proposed housing developments contained in Sites 18 and 19. We have looked at the Draft Lambeth Site Allocations Development Plan Documents. The proposal is totally out of character for the area and will create more traffic and pollution. Moreover, it will threaten existing homes and businesses. It will also negatively affect local wildlife and specially protected trees. We ask that the proposals for sites 18 and 19 are removed and new plans developed in consultation with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0833	Other	I believe your Proposed Development is totally unsuitable for the area on many grounds such as: Inadequate, Infrastructure, including Utility Services for so many more People, Traffic Chaos caused, Being Overlooked, Disruption to Local Community and Local Businesses, Inadequate Schooling Facilities, Medical Services such as G.P. and Dent Services. Please remove your Proposals for Site 18 and Site 19 from the Consultation and Develop New Plans with the Local Community. My family and I are local residents of over 60 years residency.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0835	Other	I object in the strongest terms to the proposals for Site 18 and Site 19 These sites should be withdrawn from the current Site Allocation Development Plan Document and only introduced to a future round of planning following appropriately extensive and thorough local consultation on the concepts. Despite the plans clearly having been in preparation for some years, local people have had no input into its formative stages. This is essential for a plan that would change our town centre out of all recognition and set its appearance and function for the next 50+ years. It is understood from the ward councillors that, astonishingly, they had not been invited to participate in the planning stage and were ignorant of even the concepts. The last phase of public consultation was almost eight years ago in 2016. The findings of this were not given appropriate regard in the report West Norwood and Tulse Hill – A Manual for Delivery of April	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			2017. The current proposals totally disregard the thrust of the 2016 consultation, and go far beyond the 2017 report. It is essential that Sites 18 and 19 are withdrawn from the current SADPD.	
Individual	R0837	Other	Totally opposed to plans site 18 and 19. Far to high and totally out of keeping with the area. How we can cope with the vast influx of population and services for them I don,t know. Vehicle travel is already a nightmare and buses just crawl along the high st as it is. Further along the road is another nightmare by Tulse Hill. Totally wrong . Yes need improvement but not on this scale and height.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0838	Other	I am writing in regards to the above development sites. I want it to be noted that I am strongly against this development. While I understand developments are need this, this site is far too large and imposing for the area. The south circular is already a nightmare bring pollution and traffic chaos. West Norwood high street also suffers with terrible traffic and no areas to park. The high street has a lot of independent shops which will be pushed out under the current proposal. As a West Norwood resident I feel that we have having ridiculous plans pushed on to our area, probably to do with the south circular and the ULEZ charges. We are fighting against south metal works and now this! My family and I have lived in the area for 10 years and our daughter who is 5 loves her Neighbourhood. Development is a must for an area but these high rise blocks have not been thought out properly. As a resident we would like better communication and understanding what will benefit all rather than a developer who will come in build a monstrosity and leave. I beg that it is reconsidered for the younger generation, stop adding pollution to this area and find a way that is kind to us all and better for the environment!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0847	Other	I am a resident of West Norwood and request the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0850	Other	Hi I'm in full objection in the development in Norwood road	Please refer to the general response to representations made by individuals and businesses.
Individual	R0851	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Greater London Authority	R0852	Site Allocation Policy	It is noted that a threshold range of 35% to 50% affordable housing has been set across the site as a whole. The site allocation should make clear that the 50% threshold only applies to the land which is considered to be 'public land' for the purposes of the Mayor's threshold approach and not the land in private ownership where the 35% threshold will apply.	Noted. The policy wording under the 'Affordable housing' section for this site has been amended to make clear the 35% threshold applies to privately owned land while the 50% threshold applies to publicly owned land only.
Individual	R0856	Other	I wish to object to the plans included for Site 18, West Norwood town centre. West Norwood is recognised by Lambeth as a town centre, and yet the proposals remove the existing character, independent business and victorian (?) architecture that currently defines it. The proposals would have a significant detrimental impact on the area and impact on the major tourist and culturally significant "magnificent 7" cemetery also located on the same street. The removal of the existing B&Q building, which acts as an anchor business for the local economy would similarly degrade the prosperity of the town. I would therefore like to see Site 18 removed from the plan, to allow for local co-produced plans with the local community and business owners	Please refer to the general response to representations made by individuals and businesses.
Individual	R0858	Other	I object to your current plans for these sites, they go against the Council's own plans for the area, they are not in keeping with their surroundings, they are significant taller than nearby properties (against stated lambeth plans). They will also entail destruction of historically significant parade of shops. Please go back to the drawing board and create much needed accommodation that sits well within the context of the local area.	Please refer to the general response to representations made by individuals and businesses.
De Pol Associates on behalf of Iceland Foods Ltd.	R0859	Other	De Pol Associates has been instructed by Iceland Foods Ltd to make representations to the above draft Development Plan Document (DPD) with specific reference to proposed Site 18. Iceland have an existing store at 348/352 Norwood Road which forms part of Site 18. It is important to note that Iceland have occupied the premises at 348-352 Norwood Road since October 1988 and employ 39 people in a range of roles at the store. As a long established local retailer, employing local residents and meeting the needs of the local community Iceland is concerned about current proposals for their store to be included within an area for potential comprehensive redevelopment. It is important to note that these representations should be considered in the context of the relatively recent redevelopment of 348-352 Norwood Road which demolished the previous snooker hall at first floor level and developed nine apartments over two floors in its place. This scheme was approved in 2014 under reference 14/00782/FUL and has been fully implemented. The building is now a modern building	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>providing retail and housing in a highly sustainable location. The draft DPD proposes the allocation of Site 18 for up to 470 self-contained residential dwellings and up to 7,000sqm of commercial/community floorspace. The draft policy seeks a mix of uses along Norwood Road with at least 50 percent of the units being retail. It states at the southern end of Norwood Road the building line should be set back to provide public realm and highway improvements. The Council's approach to the allocation has failed to consider the existing position in respect of existing uses and existing buildings within the allocation site. The Council's proposed approach for wholesale redevelopment of the site has significant implications for existing occupiers and the local community.</p>	
De Pol Associates on behalf of Iceland Foods Ltd.	R0859	Evidence	<p>The Council has included indicative approaches in figures 12/13 and 15/16 of the Site 18 Evidence Document. The Site Evidence Document does not appear to consider the merits or otherwise of the retention of any buildings on site and whether a wholesale redevelopment is required. The evidence document considers and presents two different approaches neither of which consider the existing site and buildings in any detail. The approach appears to be on the premise that the whole site needs to be demolished.</p>	Please refer to the general response to representations made by individuals and businesses.
De Pol Associates on behalf of Iceland Foods Ltd.	R0859	Site Allocation Policy	<p>The policy also fails to identify how the site will be delivered. It refers to phasing and with each phase required to contribute towards delivering the overall vision. However it is unclear what this means, what constitutes 'a phase' and how will it be determined whether a proposal compromises or restricts delivery of the wider vision. In contrast to the above, in 2017 in comb with the Mayor of London and other bodies the Council produced A Manual Delivery for West Norwood and Tulse Hill. The report was prepared to "encourage support and facilitate positive change for the area" (para. 1.2). The report was intended to "form and important part of the evidence base for the emerging Local Plan" (para 1.2) and was clearly therefore produced with the intention of supporting the Plan process going forward. The 2017 Delivery Plan considered Site 18 and it clearly made an assessment of the site based on the situation on the ground, excluding areas which did not require redevelopment. Based on this assessment the Iceland building and buildings to the south were excluded from the defined 'development area'. The plan on page 93 of the Delivery Report and included below at5 Figure 1 identifies the extent of the development area and clear identification of the areas excluded [image attached] As identified above the Iceland building was fully refurbished and enhanced less than five years ago with a scheme which has provided</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>nine apartments at the upper floor levels. That scheme was brought forward in the setting of a Local Plan policy which identified potential comprehensive development of the area. NPPF promotes sustainable development and in this regard paragraph 152 confirms that the planning system supports the transition to a low-carbon future which includes encouraging “the reuse of existing resources, including the conversion of existing buildings”. The Iceland building does not require redevelopment and the current proposal to include it within Site 18 with a proposal for its redevelopment is counter to NPPF paragraph 152 and the general principles of sustainable development.</p> <p>It has previously been accepted that the Iceland building will not prejudice the development of the wider Site 18. In the Officer report for the building’s redevelopment under planning permission 14/00782/FUL the Officer stated that “the proposed development would not compromise or prejudice the future development potential” (paragraph 7.1.18) of site 18. It also states that “Waylett Place also ensures that there would be a buffer between the application site and any potential future development of land to the north” (para 7.1.18). A copy of the officer’s report is enclosed with this letter. The development of the Iceland building has taken account of surroundings and it does not impact upon a wider scheme, in this setting there is no requirement for it to be included within the redevelopment area.</p> <p>Given that it has been established that the Iceland building will not prejudice the development of the wider allocation the only purpose for including the building in the allocation would relate to the public realm immediately outside the store. In this respect the existing public realm can be improved without the need for the Iceland building to be included in the allocation. In terms of the width of the pavement outside the store the existing pavement is considered to be of sufficient width and comparable to that to the south on Norwood Road. The ‘Vision for Proposed Site’ plan identifies an intention for a new north-south access route through the site. There is no reason why a cycle route could not be included as part of this proposed new route. The demolition of buildings and as result the loss of homes and extinguishment of businesses on land south of Waylett Place is an expensive price for a widened footpath, particularly where a new and alternative route is also proposed as part of the allocation. Including the Iceland building as part of the allocation for footpath widening, which would require partial demolition of a recently upgraded building where an alternative route is proposed is considered to be unreasonable and unnecessary in the circumstances.</p>	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
De Pol Associates on behalf of Iceland Foods Ltd.	R0859	Vision	<p>'The Vision' for the area on page 112 of the Draft DPD states: "This key town centre site provides significant opportunity for sustainable, mixed-use redevelopment to include new housing and affordable housing, flexible workspace, and shops and food and drink uses that contribute to the renewal of the shopping frontage on Norwood Road, helping to contribute to the 'fifteen-minute neighbourhood' this area provides for local people".</p> <p>The development of the Iceland building 348-352 Norwood Road delivered this 'vision' as part of planning permission 14/00782/FUL. The draft DPD acknowledges that development in Site 18 may come forward in a phased form as long as it does not prejudice delivery of the wider site. The implementation of 14/00782/FUL delivered this. 348-352 is already delivering on the vision and draft policy for Site 18, it represents a phase of development which has already happened. There is no need for the site to be redeveloped as part of wider proposals. The delivery of the redevelopment of Site 18 will be reliant on landowners and developers, the allocation of sites which have already been developed and brought forward with consideration of the wider allocation creates uncertainty going forward and undermines the delive</p>	Please refer to the general response to representations made by individuals and businesses.
De Pol Associates on behalf of Iceland Foods Ltd.	R0859	Other	<p>Paragraph 35 of NPPF identifies four tests of soundness, against which Local Plan documents should be assessed. Relevant tests in respect of this representation are considered below:</p> <ul style="list-style-type: none"> • Justified as an appropriate strategy taking account of the reasonable alternatives. In this instance, as demonstrated by the 'Evidence' report no consideration has been given to the retention of buildings within the area and incorporating them into proposals. This alternative approach would be reasonable, particularly in relation to 348-352 Norwood Road as a recent development which was designed to accommodate wider development in the area. • Consistent with National Policy. As identified earlier in these representations it is considered that the inclusion of 348-352 Norwood Road is inconsistent with national policy promoting the demolition and replacement of an existing, fully occupied recently redeveloped building does not represent sustainable development. In the context of the three objectives, in economic terms the building is fully occupied with a retail use on the ground floor, this would be jeopardised with unnecessary redevelopment removing a long standing occupier; Socially the proposal would result in nine households being ejected from their homes; environmentally the building is contributing to the character of the area and was approved ass being in keeping with the local area the demolition of a residential/retail mixed use to be replaced by the same but in a slightly 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			different format would not represent an effective use of land. Iceland is a longstanding retailer in Norwood having been retailing from their current premises at 348-352 Norwood Road since 1988. Iceland object strongly to the inclusion of 348-352 Norwood Road. The premises has been recently redeveloped and contributes towards the local area. It is considered that with the inclusion of the building within the allocation, as currently proposed the DPD is unsound. In order to rectify this it is proposed that either 348-352 is removed from the allocation or alternatively the block, south of Waylett Place to Lansdowne Road is removed from the allocation. I trust these representations will be given full consideration in this process and I would be grateful if I could be informed of future consultations in respect of this DPD.	
Individual	R0862	Other	<p>I have lived in West Norwood since 1994 and have seen how the area has changed over the years. I appreciate the desire to develop brownfield sites and, in particular, the need for local housing for local people but have a number of concerns about the proposals for these Sites:</p> <p>The proposals are not in keeping with the character of the local area. They would bring about a substantial change to the heart of our community and adversely affect local homes and businesses.</p> <p>The proposals for Site 18 with an approx. 11 storey tower block are not conducive for this local town centre. Indeed my understanding is that such a tall block is inconsistent with Lambeth's planning rules, as is an even taller block in the Site 19 proposals.</p> <p>The community deserves designs that recognise West Norwood as a viable successful local neighbourhood. It would be better to have incremental development rather than the imposition of huge blocks.</p> <p>The community should be adequately involved in the development of proposals for these Sites. There has been insufficient consultation/involvement to date. Such lack of engagement with the community is contrary to Lambeth's stated approach to delivery in the 2017 Masterplan.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0865	Other	I object to the Lambeth Site Allocation Development Plans Site 18 & 19 proposals as there has not been sufficient engagement with the local community and the plans as they are have the potential to be of significant detriment to the area. These plans should be revised in close consultation with local community groups and residents.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0866	Other	<p>I am writing to lodge my strong objection to the draft plans for Site 19 Knollys Yard and to demand that Lambeth Council removes Site 19 from the SADPD.</p> <p>I have no objection in principle to the site being developed but the proposed draft plans are entirely inappropriate in size, overdevelopment</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>and impact and will ruin the neighbourhood of Tulse Hill and West Norwood.</p> <p>My demand for the removal of the site from the SADPD is made on the basis that:</p> <ol style="list-style-type: none"> 1. the proposed developments are utterly inappropriate in size for a local residential neighbourhood like ours, 2. the community will not be engaged in the long term impact of the scheme, and 3. the current approach ignores all previous consultation with the community. <p>I object to the plan for the following reasons:</p> <ol style="list-style-type: none"> 1. Impact on local neighbourhood <ol style="list-style-type: none"> a. the size and overdevelopment of the buildings that would be permitted would be out of character with the rest of the neighbourhood, b. the size and scale of the development would destroy the character of the quiet, community based, low-rise neighbourhood, c. the towers would be an eyesore, visible from miles around, dominating the skyline in a negative and overbearing way, d. the towers would impact on the access to light of hundreds of existing residents' homes and gardens in nearby streets, way more far reaching than the sensitive residential neighbour identified on the site map e. the towers would allow overlooking into existing homes and gardens, destroying the residential privacy and amenity that Lambeth has made its policy to maintain, and way more far reaching than the sensitive residential neighbour identified on the site map 2. Social impact <ol style="list-style-type: none"> a. the proposals are not committed to anything more than "seeking" affordable housing, and given the high cost of construction the site is not viable for social/affordable housing b. local businesses and residents have not been appropriately informed by Lambeth Council who have shown a familiar disregard for residents in rushing through controversial schemes (cf LTN proposals) 3. Transport impact <ol style="list-style-type: none"> a. the increase in accommodation will lead to a huge increase in vehicle traffic from the 430 new homes, b. the only vehicular access proposed is via the junction of York Hill and Knollys Road, an already dangerous junction on a precipitously steep road, c. the disruption to resident's quality of life spreading for several hundred metres in every direction from the site will upset hundreds of residents for the duration of the build, much of which will need to take place at night due to its proximity to the mainline railway 	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>4. Environmental impact</p> <p>a. the proposal involves encroachment onto site of importance for nature conservation</p> <p>I look forward to news that the committee has taken the democratic decision to remove the plans as they are currently drafted.</p>	
Individual	R0867	Other	<p>I am extremely upset at the proposals for the redevelopment on the Norwood Road and Knollys Road sites.</p> <p>Both are far too large for their environment. The low rise Victorian and Edwardian developments of the area, with conservation areas do not accord with the monstrous size of both proposals. Neither will have adequate space for proper access of emergency vehicles, let alone residential parking.</p> <p>They are architecturally inappropriate to the area. They will swamp the resources of a cramped area, already densely populated. Doctors , dentists and other health practitioners are already overstretched.</p> <p>The extra traffic on Norwood Road produced by the huge expansion on the development along it will only increase pollution and misery for the residents of West Norwood.</p> <p>Get a grip Lambeth Council! Do you want to destroy a community that has survived the pandemic well, with a street full of varied shops that are tenanted and providing a decent income to the council.</p> <p>You are dropping the equivalent of a huge bomb on a lively community.</p> <p>It planning of the area needs to be dealt with separately with proper community discussion and consultation.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0868	Other	<p>I am a long term resident of West Norwood and am very concerned over the developments for Site 18 and 19. Whilst I support the need for mor affordable housing, I am concerned that these developments would threaten local businesses and homes and destroy the character of the local community which I seen build up over the thirty years we have been here, I would like to see these proposals removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0870	Other	<p>There has been no adequate public consultation on the above.</p> <p>Proposals for site 18 and site 19 must be removed from this consultation and new plans should be developed with the local community which will directly affect.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0873	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0874	Other	<p>I am writing this email to object to the proposed plans in West Norwood. These developments will break your own planning rules with an eleven story building, will increase traffic causing more pollution for local people to be breathing in and will destroy wildlife habitats along with</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			protected trees. I urge Lambeth council to rethink this matter and think of your residents who have to live here.	
Individual	R0875	Other	<p>I'd like to register my objection to the plans in the centre of West Norwood called site 18 and 19.</p> <p>Development at this scale and height is not appropriate for the proposed site and is of a low quality. It would be completely out of character for the area, and would cause considerable disruption to local people as well as long term damage to the area.</p> <p>I would support Lambeth building high quality family housing but this proposal is lazy and cheap. It makes me angry that as a predominately poorer part of Lambeth our area is seen as an easy target for inappropriate and ugly development. I can not see such schemes being proposed in richer parts of our borough.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0876	Other	<p>I write to object to the development of sites 18 and 19 as currently stands without further consultation and improvements to the design.</p> <p>Whilst it is important to develop more housing, the current plans reflect poorly on West Norwood and the surrounding areas. There should be meaningful plans to reduce the impact of ugly urban architecture which offers limited value to the community and those living around the area.</p> <p>Plans should focus on enhancing the area and adding value, including putting sustainability requirements at the front and centre. I do not see this come through in current plans. It is important to get this right. It's a once in a generation opportunity to set the tone.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0877	Other	<p>I am writing to you to object to the proposals of Sites 18 & 19 in West Norwood as a resident, I feel that very little consultation has been given to us, the local community about the proposed developments and their potential ramifications upon the neighbourhood.</p> <p>Much of what makes this area a successful place to both live and work is that it contains a wide variety of business, especially small and less attractive, such as car repairs, building supplies etc and local supporting infrastructures that come from being a effectively a 'small town style' place. Being what is referred to as a '15min Neighbourhood' and that underpins the character and function of West Norwood, many who live here simply would not be able to carry out their day to day lives if these proposed changes went ahead, therefore it seems very underhand that such proposals are being rushed in without giving those who would be affected the chance to simply - refuse-this is not good for our area, this is not about us, this will not benefit us, please don't do this.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0879	Other	<p>I am writing to log my objection to the development plans for Site 18 and 19 in West Norwood, SE27, and to ask that you remove these sites from the current consultation, so that a new plan can be designed with the community involved and in mind.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Whatever steps you have taken to let residents of West Norwood know about your plans for these massive developments, which will have a huge impact on the nature and activity of our local high street, homes and businesses, have been woefully lacking. The first thing many people, even those engaged in local concerns, have heard about them is via a campaign leaflet that was (fortunately) put through our front doors five days before the deadline for the consultation.</p> <p>Meaningful engagement with local residents would show that West Norwood has a very active and lively community with great pride in where we live, the shops we use, and the history and future of the place we call home. These residents are not averse to change, far from it. We're a diverse and adaptable community who want to share and contribute our ideas, time and money to make West Norwood a better place for all.</p> <p>You only have to look at the work of A Small Studio on Norwood High Street, the Norwood Forum, and the Station to Station group for good models of how positive consultation and change is carried out, as with improvements made to the industrial area around the bus station, which emphasises its existing character and value.</p> <p>Please withdraw the current plans for Site 18 and 19 and restart the consultation so that West Norwood residents can have a proper say. I copy in our local MP Helen Hayes and the aforementioned groups and look forward to receiving a response from Lambeth.</p>	
Individual	R0881	Other	<p>, i would like to express my complete opposition to these proposals. Their scale is ridiculous, west norwood high street would be completely devastated by these proposals.</p> <p>As for the 22 storey and 10 storey proposal, that is just ridiculous, its height would be visible for miles around.</p> <p>To even consider such a proposal, the planners must be mad. they are suggesting the total destruction of west norwood.</p> <p>Our services are awful at the moment, none of the medical centres are properly staffed with gps. we are already short of school places and teachers.</p> <p>one has to wonder who lambeths planners work for. I cannot believe these absurd proposals for west Norwood high street have been proposed, the proposal for the railway site is even more ridiculous. The scale of the buildings is totally inappropriate for our small local area. The towers would be visible for miles around. Our very poor services would be overwhelmed. We are so short of gps and teachers already. The additional traffic on already congested roads would cause havoc. I am totally opposed to these proposals. I am amazed that anyone in their right mind would put such insane proposals forward.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>The scale of the buildings are totally out of keeping with the entire local area, the only similar buildings are in Croydon.</p> <p>One has to doubt the motives of the proposers. It certainly not in our interests, indeed anyone's interest.</p> <p>Our local roads with be overwhelmed with extra traffic.</p> <p>The artisan work places with its high employment would be lost. Where will we get our scaffolders or local metal work done, or any of the multiple services it provides.</p> <p>I am totally opposed to this development.</p>	
Individual	R0882	Other	<p>I wish to object to the proposal for a high-rise development at Site 18. At 36 metres high these developments would be out of character for the area and would lead to a lowering of the quality of life for local residents. Low level development is of course feasible, preferably aimed at alleviating the housing crisis, but these proposals do not take account of the local environment, and ride roughshod over the previous consultation over these locations.</p> <p>It is shocking that a Labour council should be acting so cavalier against the clearly-expressed opinions of its own constituents.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0885	Other	<p>I wish to object to the plans for Site 18 and Site 19 and request that these proposals are removed from this current consultation.</p> <p>I have been a home-owner and resident in West Norwood for over 30 years. I am proud to be part of the local community and do not feel we have yet been consulted adequately on this sudden, radical change of direction which I believe shows little consideration of the impact this will have on our community. Yes, our High Street needs redevelopment, but many necessary shops and services will be replaced by high-density housing and the height of some of the blocks in these plans is not consistent with the surrounding area. They will be eyesores - as your planners' projections clearly demonstrate.</p> <p>These plans also go against previous plans for the area.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0887	Other	<p>As someone who daily uses the shops and services in the affected areas I am shocked that there has been no adequate public consultation on the above. Please can you tell me why this is?</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0888	Other	<p>As a resident of Gipsy Hill, with two geography degrees, one of which specialised in London's historic development, I wish to object to the proposed inclusion of Sites 18 and 19 in the Lambeth Site Allocation Development Plan. My grounds for objection are:</p> <p>1. Inadequate consultation, particularly with the established community volunteer led Neighbourhood Planning Assembly and lack of alignment with the locally developed Neighbourhood Plan. This is particularly ironic in the context of what Lambeth said about this community in the previous Master Plan of 2017:</p>	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>'It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.</p> <p>2. The scale of the proposed buildings is too massive and in particular the tower blocks (which I believe will be the first in the immediate area) are too tall. This applies to both the relationships of the buildings to their sites and to the surrounding areas. Such over-development is also likely to have a detrimental effect on the current green fringes / enclaves to the sites with knock-on damage to local bio-diversity and eco-systems.</p> <p>3. Town centres are much more complex than other areas, with a much greater mix of interests: commercial, industrial, retail, service providers on top of residential. Ours is the only town centre to be affected by the LSADP and there seems to be little consideration of how these interests which dominate the off-street parts of Site 18 in particular, are to be accommodated, as will be necessary if the town centre is to continue to thrive. One particular concern is off-street car parking, where the importance of the B&Q spaces to promoting the health of the other retailers should not be underestimated. Another is the high proportion of the site area that is occupied by frequently "dirty" semi-industrial workshop businesses which are unlikely to be deemed suitable for space in the new developments.</p> <p>4. The two sites are very different. Whilst Site 19 may be appropriate for a single master plan development, it is hard to see how that applies to the complicated, historic street layout which makes Site 18 much more appropriate for piecemeal development, that will maintain the current interesting mixture of building types, frontages and heights, not to mention ownerships, along the west side of Norwood High Street. One of the reasons why our town centre continues to thrive is the large number of independent businesses that occupy the smaller, older retail premises in the High Street and it is hard to see how these will transition into the newer and so more expensive space that Site 18 will provide.</p> <p>5. It is unclear the extent to which commercial developers will be willing or indeed financially able to provide the range of housing types and tenures that the local community needs if the current housing stresses are to be addressed. What the area does not need is more examples of the half-empty and socially soul-less developments that dominate the</p>	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>south bank of the Thames in Wandsworth, which could easily be the outcome of the LSADP's approach.</p> <p>6. Lambeth is already experiencing political differences over the proposed regeneration of some of the Council's Housing Estates. The last thing it needs is further rifts caused by an insensitive approach to commercial redevelopment.</p> <p>7. Finally, much has changed over the last two years of Brexit and pandemic, but how both of these will affect the housing market is still to be recognised. In this context, it seems rash for anyone to attempt to lay down such restrictive plans for new housing developments. However, as their plans for regeneration show, a lack of good risk management seems built-in to Lambeth Council's basic approach and so I shouldn't expect this plan to be any different...</p>	
Individual	R0890	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0892	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. I think the proposals for site 18 and site 19 should be removed from this consultation and new plans developed with us the local community involved.</p> <p>We have not been given proper public consultation at all. The ability to lodge out comments is thwarted by a labyrinthine piece of software that so many people cannot negotiate. If this was a good plan then why make it so hard to comment.</p> <p>Theses developments will dominate and destroy the character of our town centre and threatens local homes and businesses.</p> <p>What about our net zero target for 2030?</p> <p>Eleven story blocks dominating our town, are so out of character. So many people in West Norwood have worked long and hard to built a resilient community, this does nothing to this end.</p> <p>Affordable house is not affordable, it is a lie. Universal credit will be capped on anyone trying to live and work with help from the benefit system.</p> <p>I am so ashamed of Lambeth council for even considering such a huge development without consulting us, the local people, who live and work here, let alone trying to rush it through and block us from even commenting.</p> <p>I fully understand that the council needs money but ruining out town is not the way forward. This will certainly make money but I do not believe it is in anyway sustainable.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0894	Other	I am a resident of West Norwood and I demand that the proposals for Site 18 and Site19 are removed from this consultation and new plans developed with consultation with the local community. As local residents, we are well aware of the shortage of housing in our neighbourhood. We desperately need housing locally to allow our families to continue living in this area, but the plans as presented are ludicrous and would destroy our current community. We have an active and informed community who would be happy to collaborate with the council's planning department to arrive at suitable proposals for both sites.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0895	Other	I have been a resident of West Norwood for many years. It has been brought to my attention about your development proposals for West Norwood(Site18 & Site19). I am of the view there has not been adequate consultation with the local community. I strongly believe your plans are not suitable for the West Norwood and should be removed as well as replaced with new plans developed with the local community's consent.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0896	Other	I would like to object to the construction of the Site 18 and Site 19 developments in the West Norwood area. The negative environmental impact will be vast in an already hugely congested area, as well as the negative economic effect on many of our local high street shops, bars, cafes. There is nothing in the plans that appear to be in line with Lambeth's goals of achieving net zero by 2050. Please reconsider this proposal, or #ConsultTheCommunity	Please refer to the general response to representations made by individuals and businesses.
Individual	R0897	Other	With reference to the above proposed developments I live in SE27 and would like to object. I strongly feel that they are both particularly inappropriate for our area for a wide variety of reasons. Please do not put these proposals through.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0900	Other	We are residents of West Norwood and demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0901	Other	I wish to strongly object to the current proposals put forward by Lambeth. What on earth are you thinking? There are a multitude of reasons to object to these proposals. I can only assume whoever came up with these plans has absolutely no knowledge of West Norwood and was merely playing with plans on a computer. Crazy, shocking	Please refer to the general response to representations made by individuals and businesses.
Individual	R0903	Other	As a Lambeth resident I am totally opposed to both the planned proposals for sites 18 & 19 in Lambeth and ask they be both removed from the SAPD immediately. I also write on behalf of my neighbours the [name redacted] family on Broxholm road.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>They will change the neighbourhood of West Norwood/Tulse Hill in a highly detrimental way forever.</p> <p>The scale of the developments are completely out of context, destroy the character of the area, are far too tall, put increased pressure on local services, increased traffic chaos (particularly on Leigham Vale which is already terrible thanks to LTN) and huge impact on local homes and businesses.</p> <p>There has been no public consultation, which is appalling in itself, but this is hugely opposed in the local area. We do not want these developments.</p> <p>Site 18 is particularly heinous. It breaks Lambeth's own planning rules!!!! It is not fit for purpose for a 21st century town centre. I cannot believe the council have even proposed this.</p> <p>Go back to the drawing board: your plans are terrible and Lambeth do not seem to care one jot about local residents or what we think. Local elections are coming up and perhaps residents will make their feelings known at the ballot box if the council does not listen to us.</p>	
Saleha Jaffer and Olga FitzRoy, Candidates for St Martin's Ward (Labour & Co-operative)	R0906	Other	<p>Residents have expressed concern about the height of potential development being out of keeping with the area and contributing to potential increase in parking congestion and traffic. This does not mean that housing should not be built - we recognise the need for more affordable high-quality housing in the area and in London in general, however the proposal of a height of 36m / 12 stories is raising concern amongst residents as it would significantly change the character of the local area.</p>	<p>Support for more affordable homes is noted.</p> <p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted.</p> <p>West Norwood is located between two train stations, West Norwood and Tulse Hill stations, and along a road heavily serviced by bus routes connecting the area to central London. As a result, West Norwood is rated PTAL 6a, the second highest accessibility score in London. This is seen as an opportunity to promote higher density development in line with Policy D3 of the London Plan.</p> <p>As recognised in Lambeth's Local Plan 2020-2035, although higher density does not necessarily imply higher rise, taller buildings are one form of higher density development that can be appropriate for some uses and in some locations, subject to excellent design, protection of strategic views, good public transport accessibility and consideration of the impact on the surrounding area. Please note that any building taller than 25m would be considered a 'tall building' in West Norwood, since it is located south of the South Circular Road. North of the South Circular Road only buildings 45m high and above would fall in the category of 'tall buildings'.</p> <p>The approach to the site has been revisited following the consultation and new massing scenarios tested. Such townscape and visual impact assessment testing has shown the indicative approach does not have an</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>adverse effect on local character. Please see the revised evidence document for further information.</p> <p>In relation to parking congestion and traffic, any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected impacts on the local road and public transport networks. In line with London Plan policy T6 the development would be car-free and all units would be secured permit-free meaning, with the exception of blue badge holders, residents and businesses on the site would not be entitled to parking permits to park on-street if a Controlled Parking Zone (CPZ) were introduced. The number of vehicular trips generated by development on site would therefore be limited, helping to minimise impacts on parking, congestion and air quality. The Transport Assessment would also include a parking assessment incorporating parking surveys and an analysis of the parking impacts of the development. If necessary additional parking controls, such as the introduction of a CPZ to be funded by the developer, may be secured in mitigation for the development.</p>
Saleha Jaffer and Olga FitzRoy, Candidates for St Martin's Ward (Labour & Co-operative)	R0906	Other	<p>Residents have expressed concern about the height of potential development being out of keeping with the area and contributing to potential increase in parking congestion and traffic. This does not mean that housing should not be built - we recognise the need for more affordable high-quality housing in the area and in London in general, however the proposal of a height of 36m / 12 stories is raising concern amongst residents as it would significantly change the character of the local area.</p> <p>It is not clear how the proposed retail spaces would attract the same footfall in the area or be a destination for those coming from outside as the existing large B&Q , particularly with the realignment of the high street during covid, which in our view is a strong reason for more community involvement in the creation of what the future of site 18 will look like.</p>	<p>The Draft SADPD quantified 8,511 sqm GIA of existing floorspace on site whose use would fall under the category of commercial and community uses. The quantum of commercial and community uses floorspace proposed in the Draft version of the SADPD, which amounted to between 5,000 and 7,000 sqm GIA, sought to re-provide and rationalise most of the existing uses on site.</p> <p>Following the changes to the site boundary introduced in the SADPD Proposed Submission Version, the quantum of existing floorspace in commercial and community use within the site amounts to 4,316 sqm GIA, of which 1,123 sqm GIA are identified as light industrial floorspace. The SADPD PSV revised 'Land Use' section proposes between 3,000 and 4,000 sqm GIA of commercial/community space, of which at least 1,123 sqm GIA are to be re-provided as light industrial workspace.</p> <p>The amount of commercial floorspace proposed as part of the SADPD PSV would allow for the provision of large-scale commercial units such as the existing B&Q. It would also allow for the relocation of this particular unit within the Site 18 boundary.</p> <p>Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected.</p> <p>It is therefore considered that the redevelopment of the site would not</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				negatively affect the commercial viability of West Norwood district centre or the neighbouring West Norwood Creative Business Cluster. On the contrary, the completion of between 150 and 170 residential units as proposed as part of the SADPD PSV is seen as an opportunity to increase footfall in the town centre and enhance the viability of existing and future businesses.
Individual	R0908	Other	I am a resident of West Norwood and I would really like for the proposals for Site18 and Site19 to be removed from this consultation and new plans developed with the local community It's a bit much!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0909	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0910	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0911	Other	STOP THESE PLANS SAVE OUR HIGHSTREET	Please refer to the general response to representations made by individuals and businesses.
Individual	R0912	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0914	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0915	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0917	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0918	Other	I am a resident of west Norwood & I demand that the proposals for Site 18 & 19 are removed from this proposal until there is proper and meaningful good-faith consultation with the local community which has been totally absent hereto. The current proposition is unwanted, damaging and breaches all previous undertakings by the authority to work with stakeholders and is a disgrace.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0919	Other	I am a resident of West Norwood and I demand that the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed within the local community - this affects all of us who live there.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0920	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0921	Other	Please remove these sites from the consultations - I don't think these consultations are sufficient and we need sufficient input into the design and build quality.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0925	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0926	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0927	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0928	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. STOP WRECKING OUR COMMUNITY WE DONT NEED ANYMORE EYE SORES	Please refer to the general response to representations made by individuals and businesses.
Individual	R0929	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0930	Other	I am a local resident who has lived in West Norwood since 1976. I have come to love the place. It has been neglected by Council planners and little money has been spent on it. If you didn't know it, you could see it a a very modest suburban area with little in the way of attractions, although developments such as the Sports Centre and swimming pool and the refurbished library and cinema have greatly added to the amenity of the area. Even so, many of the older buildings have been neglected by their owners, especially the small retail units and although some are interesting and potentially attractive, there has been no attempt to restore or return them to their former appearance. West Norwood is an example of the Victorian suburbs that grew up around the expansion of the railways. It is unfortunate that the Victorian streets were never designed to take the extraordinary volumes of traffic that we have come to expect but, even so, West Norwood has a historic character that should be protected. West Norwood is a very good place to live. It has a strong sense of community and mutual obligation, there is a vibrant tradition of volunteering and people are friendly and, in the words of one local councillor - very chatty. In the town centre there are a number of older	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>established businesses and organisations that contribute to the character of the area; the vegetable stall, Floral Hall, the Libraries (Old and new), the Lottery-restored South London Theatre Centre. More recently as new communities have arrived we have numerous Portuguese shops and cafe and Brazilian and Polish shops. This is a strong and diverse community.</p> <p>It seems to me that any development of the town centre should seek to preserve the strong cohesive character of the community, and should aim to improve what is already there for local residents and visitors. The current plans seem have been predicated solely on what Planning perceive as the needs of developers, rather than the needs of the district and its residents.</p> <p>The Norwood Planning Assembly has worked intensively on a masterplan for the area. Among the issues that its addressed was the need to prevent inappropriately designed and situated tall buildings, so that the Norwood Road did not develop a “canyon-like character, but retained its open-ness and human scale. The decision to allow the building of a number of very tall blocks in Sites 18 and 19 will have the same effect, casting long shadows across the public space and intruding onto the local skyline in a way that will reduce the amenity and health of the area. This is not a good place to site such buildings. They do not create “a sense of place”, particularly if they are not of high quality design, they merely intrude and dominate. Our experience locally is that good design is not something that Lambeth requires developers to deliver; there are many new buildings, unfortunately, that are banal and lifeless in appearance and do not contribute to the quality of the built environment.</p> <p>There is little in the presentation that addresses the real local needs. The proposals talk about “affordable housing” something which we know does not mean very much in the face falling wages and rapidly rising prices. There is no mention of social housing, something which would be welcomed and allow people to stay within their communities. There is an urgent need to provide workspace and new jobs and training, which would enable local people to travel less and use healthy routes resulting in a decrease in pollution from the heavy traffic that dominates the Norwood Road. This would contribute to Lambeth’s environmental objectives.</p> <p>There is no mention in the presentation of Biodiversity Net Gain, although this is now a statutory responsibility of local government. People would appreciate more green open space in Norwood. There is nothing about the need to prevent destruction of existing green and biodiverse areas of the town centre. Greenspace can help to offset</p>	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>extremes of temperature and would improve local resilience to climate change and extremes of weather, objectives of Lambeth's climate policy.</p> <p>There is also a need for improved retail. There needs to be investment in what is available locally and provision for extending the local offer. This will not necessarily be achieved by destroying what is already here and replacing it with new build. In West Dulwich the Dulwich Estates have recently redeveloped the area once inhabited by the old Express Dairy site, generating a row of new shops. Aside from the local pharmacy, which moved from Rosendale Road, there are no shops that would contribute to the quality of local trade. These new premises are expensive to rent and also to run and have been taken over by niche businesses such as Hot Yoga Pods, a Women's Health Centre offering private medical services and an orthodontist. Not a list that would contribute significantly to daily life for the majority of people in Norwood. There has been very successful joint working by Lambeth's Highways department and the local community, supported by local councillors and agencies like TfL. We have a track record of co-producing successful projects, such as Streetworks, which collaborated in the improvement of the Norwood Road as part of the Mayor's "Outer London" scheme. I therefore would strongly support the removal of Sites 18 and 19 from the Site Allocations Development Plan and for the council to initiate joint working between the local community, councillors and planners to develop schemes that would contribute to life in West Norwood and future-proof the local built environment.</p>	
Individual	R0931	Other	I am a resident of West Norwood and I object to the proposals for Site 18 and Site 19. I think the proposed plans will be seriously detrimental to the town. I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0932	Other	I am a resident of West Norwood and I am concerned about the proposals for Site18 and Site19. I have no objection to local regeneration and more social housing in the area, but these proposals are out of scale with the area and need to be rethought in consultation with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0935	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0936	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0938	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0939	Other	I am a long term resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. It's totally inappropriate for the area, no decent consultation has taken place and is far from what we need. Please do the right thing and reconsider.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0940	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0943	Other	I would like to become formally to the enormous development proposed in west Norwood. There has not been adequate community consultation. The local businesses it would disrupt and destroy are integral to our community. The development would dwarf the rest of the local neighbourhood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0944	Other	I wish to object to the proposals for the high rise development at Site 18 as this is inappropriate for the area and would lead to a degradation of the local environment and place unacceptable levels of strain on local services.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0946	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0950	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0951	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0952	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. I am writing as a resident of West Norwood concerned about the complete lack of consultation or engagement from the council regarding the proposed developments on site 18 and 19. The planning documentation on the website is impenetrable. It references so much that is beyond the lay person's understanding and, crucially, is only available online. This cuts out a huge chunk of the community who do not have access to the internet, lack the time or ability to spend hours pouring over information which is delivered in an	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>obfuscated way, or who are unable to engage with documentation that is written, but who should be given an opportunity to engage. This is a seemingly blatant disregard of local people, and their genuine concerns, and a desire by the council to push ahead with developments, and to get into the pockets of the developers.</p> <p>It must not be allowed to proceed without proper consultation with the community.</p> <p>Ideally, this would be in person, with a full exhibition in the central space of this community (as was the case during the redevelopment of Crystal Palace train / overground station) in the library where everyone can see it, engage with it, ask questions and make sense of these huge proposed changes to our local area. My objections specifically relating to site 18 and 19 concern access to the site, both during the building phases and after, particularly site 19 where there is already a heavily used road with restricted access as the only access point to the site this side of Tulse Hill.</p> <p>I am additionally concerned about the housing development aspect, and would question whether the housing allocation that provides genuinely affordable rent will actually be that - or will the developers be able to change their planned application as has been the case in other areas to remove or significantly reduce the affordable housing allocation part way through or at the end of the development phase? As a caring society, we owe it to those who are unable to afford the current private rents to live in suitable accommodation which is adequately sized for family needs, and offers a desirable quality standard of living on a budget, often just that of a single person supporting others; children, older family members, etc. It is not acceptable for people to live in accommodation unsuited to their needs because they are unable afford current high rents: families forced to live in a one bedroom flat, a vulnerable person, an older person, someone struggling with ill health, unemployment, homelessness, etc. We have a duty to consider all members of our community equally.</p> <p>West Norwood is my home, and it's where I grew up. My family still live here, and we have seen the changes that have occurred in the area over the last 40 years, many of which have improved the look of the area and the way we use it - the cinema is a very welcome addition, although it took far longer than planned. As a community, we want the area to be one of which we are rightly proud and which safeguards the community feeling of the area, and provides a pleasant place for us all to live, work, shop and go about our daily activities.</p> <p>The high street is a huge benefit for us. I don't drive, and I am able to get all I need from the area without walking more than the length of the</p>	

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>high street, including buying bedding, DIY tools and equipment such as paints, clothing, shoes, topping up my zero waste goods, etc. I don't want the local area to be blighted in the way that Lewisham town centre is with huge empty retail units, buy to let housing lying vacant and decaying half developments. Can we not consider development alongside regeneration of the local area shopping district, as has been seen in Peckham on Rye Lane through the partnership with Southwark council and Peckham Heritage?</p> <p>The Broadway (as Norwood Road is called) kept my husband and I going through the course of the pandemic and it was the numerous small and independent businesses that served us well during that time. I am concerned the plans give little concrete consideration to the each business in the high street and how those businesses would be treated, or in cases where they cease or lose trade would be compensated and this is not acceptable.</p> <p>The views from Chatsworth Way towards Greggs and BnQ is dramatically overshadowed in the current plans, and would grossly affect the approach to the high street and the view from the Baptist church. It dominates the landscape and should be down scaled, or kept at low road level development. We need quality architecture, not developer architecture, the area is low lying and there are few tall buildings other than those which rightly deserve such place, like St Luke's church's bell tower which is a beacon in the area.</p> <p>I genuinely don't believe the plans should be rushed, and the current plans such as they are, suggest the process will only take two years to develop, but can this not be scaled back so that engagement can be incremental along with the development and much of the development can grow organically to respond to the changing nature of the area where development occurs?</p> <p>Currently West Norwood is a pleasant place to live, with the transport infrastructure just about servicing the local area in terms of their travel needs. The bus services are genuinely good, but the train services are interrupted and are limited during the day. How will the services cope with these increased pressures such as they are planned, including bringing an extra 1000 people into the area to live and work? What about schools, GP surgeries, dentists, gyms, leisure centres, etc. which are all oversubscribed already? Where are those development plans?</p> <p>I genuinely want to engage with development and to feel excited about what's to come in the neighbourhood but not in a way that feels like it's profit before people. It's like we, as the local community and residents are an inconvenience and one which you as the council wish to engage with at arms length and as little as possible with. It feels as if we are an</p>	

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>afterthought and are damaging and standing in the way of plans that are already in process. I will stand up for community rights, and for action that protects our way of living and gives everyone in the community an opportunity to get involved and have their say.</p> <p>West Norwood has a strong identity and we want to safeguard that. We don't want broad brush-stroke development that is unsympathetic to the local area, its history, the cemetery, the church, the old library, etc. We want an environmentally conscious development plan that takes into account how detrimental poor planning decisions and poor development can be in a local area, and to the climate, and we want a solution that offers a low-impact climate friendly alternative.</p> <p>Finally, I note that within the plans the B&Q, that is an anchor store in West Norwood, will not be protected and this would be a huge loss to the area. It is an historic building and site. It provides important parking facilities for services along the high street and allows us to keep vibrant independent businesses alive. We use the shopping facilities regularly here and we can see no specific proposals to retain this important business along with its essential parking - this is also an important asset for the rest of the shopping area, and any subsequent development plans.</p> <p>I know my email is overly lengthy but I genuinely feel concerned about the proposed developments, and the lack of consultation. This is the only way presently to make my voice heard, as you won't speak to us in person.</p> <p>Please know that all eyes are on the council to do the right thing and remove these sites - sites 18 and 19 - from the consultation and engage with the community either directly or through community led groups. Lambeth can lead the way in thoughtful and considered development, in community engagement and can be proud of what it achieves for its residents if it listens to them and their thoughts and opinions on the matters that concern them most: where they live.</p> <p>Many thanks for your consideration of the points I have raised.</p>	
Individual	R0953	Other	I am a resident of West Norwood and I ask that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0954	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0956	Other	<p>I am a resident of Streatham Hill and a mother of children at hitherfield primary</p> <p>I strongly object to your proposals to construct these huge towers in this area with little or no regard for impact on environment</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Traffic Kids lungs	
Individual	R0957	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0960	Other	<p>As a local resident of West Norwood I am writing to object to the above proposals for the following reasons:</p> <p>Both developments would be absolutely huge, with very high density akin to central London, not a London suburb. The height of the buildings is incredulous. The scale of development is completely out of context and would destroy the character of the quiet, low-rise nature of the West Norwood neighbourhood. The towers would be visible for several miles in all directions, dominating and wrecking the skyline, impacting on at least 5 Conservation Areas and dozens of listed buildings, and would have an overbearing impact on the surrounding area. The towers would impact on the daylight and sunlight of hundreds of existing homes in the closest streets, and allow overlooking into homes and gardens, wrecking residential amenity, contrary to Lambeth and national planning policy.</p> <p>The sites are not viable for social / affordable housing due to very high construction & engineering costs. Lambeth's proposals are particularly misleading, claiming they would 'seek' affordable housing</p> <p>There has been no serious attempt by Lambeth council to inform local residents and businesses; they are rushing through plans without proper scrutiny.</p> <p>Traffic and pollution:</p> <p>Massive impact on local parking, traffic and air quality. Huge increase in the numbers of cars, delivery vans and service vehicles.</p> <p>Lambeth falsely claims its car-free development, whilst policy states there will be at least 100 additional cars but no new parking spaces.</p> <p>Environmental impact:</p> <p>The development will require the removal of specially protected trees and valuable wildlife, including bats which are a protected species.</p> <p>Go back to the drawing board: your plans are terrible and Lambeth do not seem to care one jot about local residents or what we think. Local elections are coming up and perhaps residents will make their feelings known at the ballot box if the council does not listen to us.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0961	Other	<p>I am a resident of West Norwood and live on Knollys Road very close to the proposed development.</p> <p>I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community, they are utterly ludicrous</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0962	Other	<p>I would like to express my concern towards the site 18 and 19 plans to build high rise buildings along West Norwood high street and Tulse Hill. I am keen to support local growth with replenishment of housing stock to replace the old with the new but they should be in keeping with the majority of residents live here. I moved out of Inner London to start a family and enjoy the low density housing that it offers and the community it brings with it.</p> <p>I do not understand the reasoning behind displacing and destroying peoples existing housing for high rise living that is not in keeping with the area.</p> <p>There is no consideration of this development meeting or working with the net zero target for 2030 which is something we have all had to make sacrifices for in our own lives by living just outside the ULEZ zone so this would be hypocrisy.</p> <p>Please please remove site 18 and site 19 from the plans or at least do us the decency of consulting with local groups so we can understand how it will impact us in more detail and discuss with you in person the problems we think it will create for West Norwood and the community within .</p> <p>We have been actively engaged trying to help grow our community over the past few years and it would be a shame for that to be irreversibly set back.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0963	Other	<p>I am not in favour of the planned developments at Site 18 in West Norwood. Firstly I am concerned about how significant these proposed plans are, bringing about a profound change to our local neighbourhood. This has been my home for 11 years and I am raising my family in this community because it is such a strong neighbourhood with a recognisable centre, many local businesses that can be easily accessed and a real heart to the community provided by the housing that already exists. These proposals will render that neighbourhood unrecognisable. There is in these plans that acknowledges and celebrates the sense of place that already exists. Any development and change must be managed carefully, in consultation with local groups, and in keeping with what already exists here, preserving the character and businesses that already exist here. More housing is without a doubt essential in London, but it cannot come at any cost. As a resident of West Norwood for the last 11 years, I am writing to state that I believe Site 18 and Site 19 should be removed from Lambeth's development consultation. These developments on Knolly's Yard and the area on West Norwood High Street are significant. These developments will radically and negatively change this area as we currently know it. They will profoundly impact the retail and residential heart of West Norwood</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>and Tulse Hill – one of the five town centres recognised by Lambeth. No other Lambeth town centre is to be affected in the same way by these development plans, so the consultation process must also be treated differently to reflect this.</p> <p>There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact. Therefore I demand that Sites 18 and Sites 19 be removed from the current consultation and be addressed separately and in proper discussion with the local community.</p>	
Individual	R0964	Other	<p>I am objecting to the above proposals on the following grounds:</p> <ul style="list-style-type: none"> - there has not been enough/adequate public/local consultation - there is a threat to local businesses - there will be increased pressure on local services - more traffic, less parking and more congestion affecting the local school - loss of wildlife - lack of affordable housing 	Please refer to the general response to representations made by individuals and businesses.
Individual	R0965	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0966	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0967	Other	<p>I am writing to object in the strongest terms to both planning applications Site 18</p> <p>The density of the development the design is poor and completely out of keeping with the area.</p> <p>For the development to go ahead Lambeth will approve the demolition of Victorian shops and the flats/family homes and businesses. These buildings that go back through generations and makes West Norwood and its High Street the valued community asset we all love.</p> <p>There is no talk of investment in the local infrastructure. This development will add to the demand on an area already creaking. Schools, GP practices, Hospitals....</p> <p>The blight that this proposed development will bring to the already struggling high Street – development will destroy businesses and be the final nail for our high street and our community. We are diverse area the affluent roads sitting comfortably with the less affluent it is what makes West Norwood unique in Lambeth and London</p> <p>We will lose shops the shops that are so important to our community. Whereabouts the family business providing school uniforms so valued</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>by families supplying school uniforms branded for local schools so important to the students. So vital to local families needing help. No talk about or when or if they will ever come back. No talk about how this valued family/community/school shop will be replace in the interim? B&Q is so important to our local economy, Town Centre and High St B&Q does not just serve local people it is a destination DIY/Building supplies store bringing traders to the area. AGAIN there is nothing to assure us B&Q will ever return. The blight will be devastating, for all of us.</p> <p>Iceland – is so important to the High Street. It sells foods at prices families can afford –it goes across the divide, rich and poor, the old, the young and the vulnerable. When this store closes – as it will – it will be devastating for all of us and all other businesses and the local economy. Will it ever return?</p> <p>The proposed housing does not provide the homes that will provide family homes, allow families to grow, participate and be an integral part of our community. West Norwood and Lambeth residents deserve better.</p> <p>This is a lazy unthought through application that does not do justice to a Labour administered council.</p> <p>This application should be withdrawn immediately. Lambeth Planners should be tasked with a plan that will build the community, invigorate the high street, and provide housing that families want and deserve. Not for the short term but forever</p>	
Individual	R0969	Other	<p>I am writing with regards to the proposed planned mega blocks on site 18 & 19.</p> <p>I asked that the current proposal be removed from this consultation and a new plan developed with the local community. I look forward to seeing the new revised plans which has a community involvement.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0970	Other	<p>I am a resident of West Norwood and I demand proposals for site18 and site 19 are removed from consultation and new plans are developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0971	Other	<p>I have been a resident of West Norwood for 38 years and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>1: Why I believe the two sites must be removed from the current consultation</p> <p>The group have been 'briefed' by Lambeth Council's Development Team in a one hour meeting and that is all the public engagement that Lambeth are prepared to do.</p> <p>I do not consider this sufficient for such radical proposals for our neighbourhood. I shall be campaigning vigorously to have Site 18 and</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Site 19 removed from this Draft for the following reasons:</p> <ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact • This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes: It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. A positive way forward There is an established community volunteer led Neighbourhood Planning Assembly who are writing a Neighbourhood Plan. This forum should be used to develop genuinely collaborative and community driven proposals for these two sites. I look forward to your reply. Please kindly consider my views in regards to the proposed developments of these two sites. 	
Individual	R0972	Other	<p>I am a resident of West Norwood [address redacted] and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>The scale of development is completely out of context and would destroy the character of the quiet, low-rise nature of the West Norwood neighbourhood.</p> <p>The towers would be visible for several miles in all directions, dominating and wrecking the skyline, impacting on at least 5 Conservation Areas and dozens of listed buildings, and would have an overbearing impact on the surrounding area.</p> <p>The towers would also impact on the daylight and sunlight of hundreds of existing homes in the closest streets, and allow overlooking into</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			homes and gardens, wrecking residential amenity, contrary to Lambeth and national planning policy. There is also insufficient time to adequately engage the community in understanding the proposals and their long term impact.	
Individual	R0973	Other	I object to the inclusion of the above 2 sites in the Lambeth Site Allocation Development Plans consultation. They should be removed. They are far too big, completely out of proportion to the neighbourhood, out of character to this historic neighbourhood, will destroy valued local retailers and employers, put significant increased pressure on local services and infrastructure and worsen local amenities.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0974	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0975	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Cllr Anna Birley, Cllr Fred Cowell, Cllr Peter Ely, Thurlow Park Ward Councillors (Labour and Co-operative) and Judith Cavanagh, West Dulwich ward candidate (Labour and Co-operative)	R0976	Other	We are very concerned about the proposals for site 18 included in the Draft SADPD. Although site 18 is not in Thurlow Park Ward, it is only just outside the ward and the future of this site has huge significance to the town centre of West Norwood much of which is in Thurlow Park ward and the new West Dulwich Ward. The proposals in the draft SADP appear to be developer rather than community led and take no account of the masterplan refresh exercise of 2017 and work to develop the Norwood Local Plan.	The document 'West Norwood and Tulse Hill: A Manual for Delivery', published in 2017, built up on previous work carried out for the preparation of the 2007 Unitary Development Plan (UDP 2007) and the production of the 2009 Masterplan. It was thought as a framework to guide the way in which the area was to change in the future. This piece of work and other consultation work in West Norwood, have provided an extensive and valuable insight on local community aspirations and priorities, these include: <ul style="list-style-type: none"> - Supporting the growth of the town centre and local businesses - Providing new mixed tenure housing - Improving public realm - Improving pedestrian and cyclist permeability - Improving public transport accessibility The Site Allocations Development Plan Document, whose draft version was consulted on, is a planning policy document seeking to provide a framework for development that meets such aspirations and priorities. The quantum of development indicated in the Manual for Delivery 2017 was illustrative. It lacked a detailed delivery plan based on a comprehensive feasibility assessment. The Draft SADPD is the result of a detailed assessment of the site against the parameters of the Development Plan policies (London Plan and Lambeth Local Plan) and the current economic, social and environmental context in order to produce an indicative development proposal that is feasible and viable. Following the recent consultation and in response to the representations received, the boundary of the site and the indicative massing of the

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				buildings proposed have been revised. The revised site allocation for Site 18 is included in the SADPD Proposed Submission Version.
Cllr Anna Birley, Cllr Fred Cowell, Cllr Peter Ely, Thurlow Park Ward Councillors (Labour and Co-operative) and Judith Cavanagh, West Dulwich ward candidate (Labour and Co-operative)	R0976	Other	There has been no meaningful consultation with councillors, community organisations or residents of West Norwood about these proposals for site 18 prior to their inclusion in the draft SADP.	<p>The document 'West Norwood and Tulse Hill: A Manual for Delivery' summed up the work carried out over a long period of collaboration between the council and local residents and community groups that started with the preparation of the 2007 Unitary Development Plan (UDP 2007) and continued throughout the production of the 2009 Masterplan and the subsequent Local Plan adopted in 2015. Although the Manual for Delivery is not a planning document, its findings have guided the preparation of the most recent Local Plan (2021) and the draft Site Allocation Development Plan Document consulted on, with particular attention to the aspirations and priorities of the local community.</p> <p>On 13 December 2021 a Consultation and Engagement Plan for the Regulation 18 consultation of the Draft SADPD was agreed by Cabinet. Based on that Consultation and Engagement Plan, and consistently with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020, a timeframe for the consultation was drafted. A full report on the Regulation 18 consultation will be published alongside the SADPD Proposed Submission Version. The report explains in detail the methods the council used to raise awareness about the consultation and to encourage people to respond. The primary method used was Commonplace, the digital consultation platform used by the Council. Supplementary methods included engagement with ward councillors, local MPs, Area Meetings with representatives from community groups and organisations based in neighbourhoods with a site in the SADPD, presentations, and workshops with Young People.</p> <p>Ward councillors were engaged in meetings on 8, 9 and 16 December 2021, all held virtually following government guidance on the COVID-19 pandemic. Local MPs were briefed on 21 January and 1 February. Both ward councillors and local MPs were invited to join Area Meetings. The Area Meeting for West Norwood was held virtually on 24 January 2022 following government guidance on the COVID-19 pandemic. Ward councillors, local MPs, as well as representatives from community groups and local organisations were provided with the information necessary to support residents in accessing the consultation material and encouraged to disseminate information about the consultation to the wider community. Council's own publicity and dissemination methods included i) notifications by email to over 2,000 contacts, including the statutory, specific and general consultation bodies required by the regulations, but also community stakeholders, ii) publications on social media platforms such as Twitter, Facebook, Instagram, LinkedIn and Nextdoor, iii) a blog post on</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>Love Lambeth, iv) online newsletters and bulletins, v) physical copies of the draft SADPD displayed in public libraries, and vi) a dedicated website. The council also notified up to 1,141 groups through Integrate, a directory of voluntary, community and social enterprise sector organisations that operate in the borough.</p> <p>Following the consultation, the council organised three targeted stakeholder engagement workshops with representatives of the community stakeholder groups that had submitted responses to the Regulation 18 consultation on draft sites 18 and 19 in West Norwood/Tulse Hill. These were held over a six-week period in October and November 2022. These workshops provided an opportunity for Council officers and Members to further explore the points raised in the Regulation 18 representations with local representatives. These workshops have helped inform the Council's consideration of the Regulation 18 consultation responses received and the resulting content of the SADPD Proposed Submission Version for Site 18.</p>
<p>Cllr Anna Birley, Cllr Fred Cowell, Cllr Peter Ely, Thurlow Park Ward Councillors (Labour and Co-operative) and Judith Cavanagh, West Dulwich ward candidate (Labour and Co-operative)</p>	R0976	Other	<p>We welcome the proposal to develop more housing, but have specific concerns about;</p> <ul style="list-style-type: none"> • Anything over 7 storeys is out of keeping with the area and topography of West Norwood. Developing a 12 storey building would significantly alter the entire nature of the area. 	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted.</p> <p>West Norwood is located between two train stations, West Norwood and Tulse Hill stations, and along a road heavily serviced by bus routes connecting the area to central London. As a result, West Norwood is rated PTAL 6a, the second highest accessibility score in London. This is seen as an opportunity to promote higher density development in line with Policy D3 of the London Plan.</p> <p>As stated in policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Higher densities and taller buildings, despite bringing change to the character of the area, are seen as an opportunity to deliver the local community's aspirations and priorities, including the growth of the town centre and the local economy and the provision of mixed tenure housing. Following the consultation of the Draft Site Allocations Development Plan Document, the massing and height of the buildings indicatively proposed for Site 18 have been amended. The general height the revised SADPD Proposed Submission Version proposes for the tall building located at the centre of Site 18 is 75m AOD, approximately 31 m above ground level in</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>that location given the sloping nature of the site. As per Local Plan Policy Q26, a building 31 meters in height (between 9 and 10 storeys) is considered a 'tall building' for this part of the Borough. This contrasts with areas of the Borough north of the South Circular Road where only buildings above 45m in height would fall under the category of tall buildings. This building would be just over five metres higher than the tallest of buildings consented under planning application reference 19/02840/FUL, which affects the site on 6 Lansdowne Hill, also known as the Laundry, and is currently under construction.</p> <p>The proposed indicative quantum of development has been assessed in order to determine whether it meets acceptable standards of amenity, access, transport accessibility and servicing. These assessments include Daylight and Sunlight assessments of the proposed massing, as well as impact assessments on strategic or local views, therefore, meeting the requirement set out in Policy Q26A i) of the Local Plan. Any scheme for a tall building within the site put forward to the Council in the future, will need to meet this and the rest of requirements outlined in Policy Q26A.</p>
Cllr Anna Birley, Cllr Fred Cowell, Cllr Peter Ely, Thurlow Park Ward Councillors (Labour and Co-operative) and Judith Cavanagh, West Dulwich ward candidate (Labour and Co-operative)	R0976	Other	<ul style="list-style-type: none"> • The lack of clear direction for the retail space. Previous aspirations have included the development of a destination store shopping area. Would the parking spaces those businesses by their nature require be provided? 	<p>Following the changes to the site boundary introduced in the SADPD Proposed Submission Version, the quantum of existing floorspace in commercial and community use within the site amounts to 4,316 sqm GIA, of which 1,123 sqm GIA are identified as light industrial floorspace. The SADPD PSV revised 'Land Use' section proposes between 3,000 and 4,000 sqm GIA of commercial/community space, of which at least 1,123 sqm GIA are to be re-provided as light industrial workspace.</p> <p>The amount of commercial floorspace proposed as part of the SADPD PSV would allow for the provision of large-scale commercial units such as the existing B&Q. It would also allow for the relocation of this particular unit within the Site 18 boundary.</p> <p>Any future application for the development of any part of the site will be subject to the London Plan and Lambeth's Local Plan policies relating to transport, in particular London Plan Policy T6 for maximum car parking standards, electric vehicle charging and Disabled Persons Parking requirements, and Local Plan Policy T6 on car club membership and permit free developments.</p>
Cllr Anna Birley, Cllr Fred Cowell, Cllr Peter	R0976	Other	<ul style="list-style-type: none"> • The proposals should include provision of a town square or common space. 	<p>The vision proposed for Site 18 in the Draft Site Allocations DPD consulted on as part of Regulation 18 includes improved public realm around and within the site, with increased pedestrian and cycle permeability and urban greening measures. A new built frontage on Norwood Road that creates a more generous footway and a new town centre public space with active</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Ely, Thurlow Park Ward Councillors (Labour and Co-operative) and Judith Cavanagh, West Dulwich ward candidate (Labour and Co-operative)				frontages are also proposed as part of this vision. Despite changes to the boundary and indicative massing of the buildings, the same improvements to the public realm around and within the site as well as the provision of a generous pathway along Norwood Road and a new town centre public space continue to be part of the proposal for Site 18 under the SADPD Proposed Submission Version.
Cllr Anna Birley, Cllr Fred Cowell, Cllr Peter Ely, Thurlow Park Ward Councillors (Labour and Co-operative) and Judith Cavanagh, West Dulwich ward candidate (Labour and Co-operative)	R0976	Other	Lambeth Council is a key stakeholder as the owner of the B&Q building and other parts of site 18. This provides an opportunity to take a more ambitious community and council led rather than a developer led approach to site 18. We believe strongly that this should have considerable input from the local community and the objective should be to achieve redevelopment appropriate in scale to the site and surrounding area, address local priorities, provide as much council or genuinely affordable housing as possible and provide for the current occupants and residents of site 18.	<p>As indicated in responses to previous points in this representation, input from the local community has been taken into account to the extent that those aspirations and priorities summarised in the 'West Norwood and Tulse Hill: A Manual for Delivery' document have formed the basis for the preparation of the draft site allocation for Site 18.</p> <p>Further opportunities for community input will arise at the time applicants put forward detailed proposals for each of the parcels within Site 18. Any proposals submitted as part of planning applications will be considered against Lambeth's Development Plan (London Plan, Lambeth Local Plan and, once adopted, the Site Allocations Development Plan Document) as part of the planning application process.</p> <p>As an example, the number and tenure of affordable housing units proposed as part of any future planning applications within Site 18 will be assessed against London Plan policies H4, H5 and H6 and Lambeth Local Plan policies H2 and H4. The standard London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria. Alternatively, Viability Tested Route will apply for applications that do not secure the mentioned thresholds.</p> <p>The application of the Fast Track Route would ensure that at least 35 per cent of all residential units proposed as part of major planning application will be affordable residential units, including low-cost and intermediate products. Where development occurs on publicly owned land, this percentage will increase to 50 per cent of all residential units proposed within the parcel. In both cases, of the total number of affordable residential units proposed, 70 per cent would be low-cost units (including Social Rent, also known as "council", and London Affordable Rent products) while the</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				remaining 30 per cent would be intermediate units (including London Shared Ownership and London Living Rent products). Instead of the whole site being developed at once, it is most likely that separate planning applications affecting specific parcels within the site are submitted independently by different applicants at different times. It is therefore expected that the site will be developed gradually and in line with the documents in Lambeth's Development Plan stated above, allowing existing businesses and residents to adapt.
Cllr Anna Birley, Cllr Fred Cowell, Cllr Peter Ely, Thurlow Park Ward Councillors (Labour and Co-operative) and Judith Cavanagh, West Dulwich ward candidate (Labour and Co-operative)	R0976	Other	West Norwood has a strong community identity and is represented by several established community groups such as the Norwood Forum, Norwood Action Group, Norwood Planning Assembly and Station to Station. The area has benefitted from projects which have had strong community involvement such as Streetworks and the recent £130,000 grant from Highstreets for all to create affordable workspace and attract new businesses. The local community have also campaigned successfully on many issues including retaining the West Norwood sorting office and opposing the proposed metal recycling facility in Windsor Grove. It is clear that the capacity and structures exist for the West Norwood community to participate effectively in a joint community/council project to decide the future of site 18. We therefore support the response from the Norwood Forum and other local community bodies to remove site 18 from the draft SADP and to develop it as a separate project.	Noted.
Individual	R0977	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0978	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0979	Other	I am a resident of West Norwood and I demand proposals for site18 and site 19 are removed from consultation and new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0980	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0981	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0982	Other	I am a resident of West Norwood I have lived in Norwood for the past 11 years . That site 18 and 19 are up for proposals . I demand the that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the residents who live in the local in community. Thank you for taking the time to listen	Please refer to the general response to representations made by individuals and businesses.
Individual	R0983	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0984	Other	I strongly object to the proposal for sites 18 and 19 in the West Norwood area. As a local resident, it seems obvious to me that any development of these sites should be done in full consultation with the local community who are the ones who will be most affected by this and who are most invested in the the local area. There has been no proper public consultation regarding this plan and it utterly fails to take local concerns into account. West Norwood town centre would certainly benefit from investment and thoughtful development but a development along the lines of what is proposed would destroy the unique character of the area and threaten local businesses, not least in the construction phase, which would be lengthy and create a huge amount of traffic, congestion and pollution in an area that already struggles with traffic flow. What is particularly offensive is Lambeth councils apparent determination to introduce tall buildings into a suburban area, thereby creating a precedent for further development. Such high density development is unwelcome and unnecessary and there is plenty of scope for infilling with buildings of an appropriate scale and design. The dramatic and permanent impact on the South London skyline of this monstrous development would be an act of social vandalism that local people will not forgive. Remove the current plans for sites 18 and 19 from the plan and engage with the local community in a genuine and meaningful way to develop suitable plans for West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0986	Other	I am a resident of West Norwood and I want the proposals for sites 18 and 19 of the Lambeth redevelopment to be reconsidered with proper community involvement. I am not a nimby. I support development . We need more Affordable and Social housing. But it needs to put the community environment and residents, both the current and future ones	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			in the developments, before the interests of developers. The current plans manifestly do not achieve this.	
Individual	R0987	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0988	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0990	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed in consultation with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0991	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0993	Other	I feel ambushed and appalled at the lack of information & clarity provided to the community about Site 18 &19. I want to request more time for this community to be able to understand this proposed project. I am writing to demand the removal of Site 18 and Site 19 from this consultation. My main concern is that there is no provision for extra parking in an already very congested area and that although I welcome new housing this project looks to impact the local community more negatively than positively. Mainly in terms of the impact on b&b and local businesses.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0994	Other	I have recently moved back into the area and delighted to see how Norwood has changed for the better , it's a different place to what it was., Will you re -consider the plans for site 18 and 19 they are not sympathetic to the area and not want the locals deserve .	Please refer to the general response to representations made by individuals and businesses.
Individual	R0995	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0996	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0997	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0998	Other	I am a long term resident of West Norwood and I appalled at the plans for these 2 sites. They singularly fail to take into account any consideration for the nature of the local neighbourhood and will ride roughshod over the community that exists here. For this reason I, along with many others in the local area, demand the proposals for Site18 and	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Site19 are removed from this consultation and new plans developed with the local community.	
Individual	R0999	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1001	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1002	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1003	Other	The proposal to build dense structures and a high rise tower of 11stories is totally out of keeping with the surrounding two and three story buildings. This is contravening the 2021 Local Lambeth Plan as it does not integrate with the locality. I totally object to this plan. I object to the proposal to develop the site with such dominating and dense structures. west Norwood is a successful and vibrant community. While recognising that there is a need for more housing but these need to be in PARTNERSHIP with local people. With potential for a large influx of residents I fear the heart of the area would be overwhelmed. B&Q is an anchor store attracting shoppers to the High Street. Why destroy it? Where would everyone park their cars/send their children to school	Please refer to the general response to representations made by individuals and businesses.
Individual	R1005	Other	I am a long term resident of west Norwood and object to these plans for the high street. New ones must be developed in conjunction the the community. The current plans demonstrate that community views have been ignored	Please refer to the general response to representations made by individuals and businesses.
Individual	R1006	Other	Major objection to sites 18 and 19 because of lack of adequate commiunity consultation	Please refer to the general response to representations made by individuals and businesses.
Individual	R1007	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1008	Other	I am a resident of west Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1009	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1010	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1012	Other	<p>I strongly object to the proposals to develop the above-mentioned sites in West Norwood and agree with the numerous objections already submitted.</p> <p>I am shocked by the lack of consultation by Lambeth Council with West Norwood residents and wonder if any Cabinet members actually live here, have detailed knowledge of the area or care as passionately about our community as those of us who have our homes here?</p> <p>We have a strong and ever improving community, thanks to the tireless work of many groups and individuals over the years. The area has changed from being a forgotten part of Lambeth, with little investment, to somewhere attractive to newcomers - particularly young families.</p> <p>Discussion about a vision for our town centre has been taking place for years amongst very committed groups of people. Their knowledge and the information they have gathered should be welcomed by the Cabinet. It is unbelievable that a Council who is truly committed to the good of Lambeth residents should ignore the views of the very people who voted them into office!</p> <p>The proposed Site 18 would destroy the heart of West Norwood. I have no faith in vague claims about the best quality styles of architecture and materials being used. Ira Court in Norwood Road is a prime example of a very poorly designed development, completely out of character with the area and poorly maintained. It's retail units look sterile and it took years before any of them were occupied.</p> <p>High-rise blocks should play no part in enhancing West Norwood and would be completely out of place near to the gently curving Victorian buildings opposite Site 18. High-rise accommodation has been proven to be detrimental to the mental health and well-being of families - as well as isolating to older people. It is very surprising that Lambeth Council are even entertaining the idea! The provision of high density accommodation is possible without high-rise block that, I understand' are also expensive to maintain long-term and result in soaring service charges that preclude affordable tenure.</p> <p>As a long-term, rate-paying resident of West Norwood, who is committed to working towards continuing to improve the well-being of the community, I demand that the proposals for Site 18 & Site 19 be withdrawn and a plan drawn up to allow the proper involvement of the community in any decision-making about our future.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1013	Other	Demand the proposals for site 18&19 are removed from this consultation And new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1014	Other	Please remove site 18 and 19 from the current consultation and please develop new plans with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1015	Other	This is a message, to object to the horrendous project that Lambeth is planning. Please don't ruin our local community with this massive tower block, our roads and wildlife have already been damaged by constant constructions of buildings. We don't want this in our neighbourhood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1017	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1018	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1019	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1020	Other	Please see below for my questions/concerns regarding the proposed Site 18 developments. Consultation Time - I had been running the West Norwood Service Station site for last 25 years, where I have given 25 best years of my life to improve the community providing jobs and opportunities, I feel as if my efforts haven't been appreciated and feel really disappointed for giving only 6 weeks consultation. This whole news has been devastating for me and my health as I rely on this income to live and I'm worried for my staff and their families too. Compensation – Would I receive market rate for the freehold land that I own? How do you plan to work out the valuation for my site? How does the whole process work, would I get the right to respond with my views regard what's being offered for my land? Timelines – When is the development planned to be implemented or is there a way this can be stopped? Compulsory purchase orders – How does this process work? Would you come and offer market rate for all free holders? And would the offers be increased for owners who decline to sell? Would it be possible to lease out my freehold land to Lambeth instead of selling to Lambeth? Directly affected retailers – Would it be possible to get first refusal on any newly build flats or shops? And would these be sold as freehold?	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1021	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p> <p>I am shocked at how little consultation there has been before such enormous changes are proposed to a community that has just come out of two years of a pandemic.</p> <p>This is a sensitive and difficult time to be changing people's entire urban environment without proper consultation. The effect this will have on the mental health of those affected in West Norwood seems to have been callously ignored.</p> <p>There is so much wrong with this proposal that it cannot be rushed through. If this happens then the community I know and love will be changed and quite possibly damaged.</p> <p>No other Lambeth town centre is to be affected in the same way by these development plans, so I believe that the consultation process must also be treated differently to reflect this.</p> <p>This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes:</p> <ul style="list-style-type: none"> • It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. <p>B & Q and the other 'dirty' businesses currently on the site need to be protected as they prevent a great deal of commuting further afield. As someone without a car I find the local provision of these kinds of businesses is extremely useful. Why are Lambeth encouraging development that will increase car use?</p> <p>Further to this the green credentials of the plan are not thought through. West Norwood has grown organically and is a successful community. These huge broad brush plans are not the way this community has done things so far. I would like to suggest incremental development, in collaboration with our volunteer led Neighbourhood Planning Assembly.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1022	Other	<p>Firstly , as a resident of West Norwood these plans are really quite shocking . Where are your commitments to net zero and averting climate catastrophe ? Where is your commitment to conferring with the</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>local community ? For everyone's sanity think again and remove these plans from the consultation till you are able to take a sensible and professional viewpoint which does not ride roughshod over the London Plan .</p> <p>The deluge of planning applications throughout Lambeth is disturbing but those that are in West Norwood particularly so as there has been no consultation whatsoever with the local community and both the plans for site 18 and site 19 are totally not in keeping with the surroundings. What is going on ? Our local councillors for Knights Hill seem to have been kept in the dark till now It would be a disaster for local families whose homes would be demolished and for the very many local businesses facing annihilation . The embodied carbon that will be created through demolition of the whole street will make the project unviable and probably illegal once legislation comes in to make sure that building work is sustainable and will be zero carbon .</p> <p>High rise buildings on the frontage of 6 stories and 12 stories behind would totally change the high street for the worst and would not be in any way an advantage to the neighbourhood. There are enough soulless shopping centres and high rises in urban London as it is . Does West Norwood want to be like any other generic shopping centre and do families want to live in ugly high rises ? There are enough empty flats in Nine Elms which need filling . Please don't try to sell us the line that it's all about creating much needed housing for those on the housing waiting list. You will be making many households lose their homes and not replacing many more at social rent. The 'affordable' tag is well understood not to be affordable to very many Lambeth residents .</p> <p>The arrogance of this council in dictating hideous schemes with no thought for the disruption to communities , not to mention the health of our local area with the pollution caused by years of demolition and rebuild is unthinkable. For everyone's sake these plans are a no go area.</p>	
Individual	R1024	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1025	Other	I am writing to object most vehemently to the proposals for Site 18 and Site 19 as it would cause irreparable damage to the community of West Norwood. As a resident of 34 years I am shocked at the massive scale and height of the proposed development in a residential area of low density and low rise housing. This is a suburban neighbourhood. It would destroy the character of the local area and ruin the nature of the neighbourhood shopping street, which has a variety of small and	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>culturally diverse businesses.</p> <p>West Norwood is characterised by its historic Victorian shopping street and the large number of 1930s semis with gardens on tree lined streets, providing valuable habitats for wildlife.</p> <p>A development of this scale would ruin the landscape, the historic skyline and cause a catastrophic loss of amenity, pressure on local services, traffic chaos and reduced air quality.</p> <p>I urge the council to remove these 2 sites from the consultation and that new plans be developed with the local community.</p>	
Individual	R1026	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p> <p>I am a resident of York Hill and demand that sites 18 and 19 are removed from the current consultation until the proper processes with the community and assessment of the infrastructure can be assessed.</p> <p>York Hill is not suitable to be the main access point for this increased infrastructure let alone the other planning concerns.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1028	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed in consultation with the local community.</p> <p>These massive tower blocks would overpower the neighbourhood and jeopardise the community feel in our historic town centre provided by local people and businesses. Please listen to the local residents.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1029	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community!</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1031	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1032	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1033	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1034	Other	<p>I do not agree with the proposals for sites 18 and 19. They will be a blight on the neighbourhoods with architecture and size completely inappropriate to the areas. I had thought that high rise and high density development had long been discredited for family homes, with many blocks built in what, I thought up to this point, were the less enlightened times of the 1960s. The prospective 22 storey block seems completely offensive and will look like a "monstrous carbuncle" blighting the</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			landscape and views for many miles around. It's not just this building, but the inappropriate tall and charmless building around it will make the whole development look like a bleak, nightmare dystopian scene straight out of George's Orwell's "1984". It seems that Lambeth Council is hell-bent on building the slums of tomorrow, today. Let's face it, West Norwood is not a very upmarket area and the only people wanting to move there to a VERY high rise development, would be the poor and desperate who would have no choice in the matter. This disinclination would be exacerbated by Lambeth's policy of not providing parking, which would make their lives even more bleak. In these circumstances one could not expect residents to take any pride or interest at all in their deprived surroundings which would inevitably lead to destructive and antisocial behaviour. Lambeth need only look at the bleakness of the high rise residential blocks and their surroundings in central Croydon below the overpass to realise this is a very real prospect.	
Individual	R1035	Other	<p>I'm writing to ask that you remove site 18 and site 19 from the SADPD (the 'Site Allocation Development Plans Draft').</p> <p>I believe these sites would have a hugely detrimental effect on the local community and the plans haven't been properly engaged with on these plans.</p> <p>Such huge High storey buildings would be totally out of keeping with the local community that we currently have.</p> <p>My children go to school nearby and I would be very concerned about the detrimental impact a development like this would have on local air quality and pollution.</p> <p>I am concerned this would lead to the removal of what little trees and wildlife there is in the area.</p> <p>I strongly object to the plans on site 18 and site 19.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1036	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1037	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1038	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1039	Other	I am a resident of West Norwood and I demand that plans for site 18 and site 19 be removed from the consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1040	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1041	Other	<p>I am writing to express my complete opposition to the development plans for these sites.</p> <p>The town centre proposals (18) will completely ruin the character and identity of the Norwood Road high street, especially with an 11-storey block in the centre.</p> <p>It is an unnecessary threat to local retailers and businesses.</p> <p>There has been totally insufficient consultation about the future direction of the town centre.</p> <p>This scheme has the classic and depressing look of 'developer push', rather than a locally derived sympathetic and organic progress towards a better social and economic plan and environment. We know from previous examples of this kind of aggressive development that planned 'affordable housing' always get rowed back when over-ambitious plans run into trouble.</p> <p>Once schemes like this get a toe-hold, they set a planning precedent for bigger and higher developments - this is not where we should be going with our local environment - we are not Croydon, thank god.</p> <p>This proposal must be halted, and we should get back to planning in conjunction with local people, and with ideas that are sympathetic to the local environment, in accordance with the 2017 Masterplan: Moving Forward: A Collaborative Approach to Deliver.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1043	Other	I've seen the plans for the above. I don't feel there is sufficient evidence of community engagement to go ahead at this point. There are clear traffic, environmental and social issues raised by the plans that are not sufficiently well addressed to go ahead in my view without further consultation and analysis.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1044	Other	I am a resident of West Norwood and I demand that plans for site 18 and site 19 be removed from the consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1045	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>I'm all in favour of developing West Norwood and making it nicer but these blocks are way too big!</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1046	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1047	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1048	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1049	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p> <p>Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this.</p> <p>There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact</p> <p>This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes:</p> <ul style="list-style-type: none"> • It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R1050	Other	<p>I am a resident of Streatham/West Norwood and I demand the proposals for Site18 and Site19 be removed from this consultation and new plans developed with the local community.</p> <p>Consultation with the community has been non-existent and we fear that all the good work done over the last few years with regard to plans for the development of the area will be undone with these proposed developments.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1051	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1052	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			developed with the local community. They are totally out of proportion to the area and will ruin the centre of West Norwood.	
Individual	R1053	Other	<p>I am writing in relation to the proposed siting of tall buildings at Tulse Hill and West Norwood in your SAD PD document.</p> <p>I understand that planning guidance is now that authorities will be directed that tall buildings should only be built in designated areas. That does not excuse the attempt to drop several large incongruous buildings in the West Norwood/Tulse Hill area.</p> <p>A few years ago there was a proposal that tall buildings would be built in Norwood Road - this led to a riotous public meeting whereby the people of Norwood were clear - NO TALL BUILDINGS AROUND WEST NORWOOD OR TULSE HILL. Our councillors and the planning staff understood the rationale and the strength of feeling. We had commitments that our objections were heard, understood, and that there would be no plans for redevelopment sites which would go much above 4 storeys.</p> <p>This planning document is therefore undemocratic and contravenes our councillors desires.</p> <p>In summary, our objections remain as:</p> <p>Norwood is built on hills - our houses and streets have wide-ranging views across the City and East London. These Long distance views are part of our public amenity and should be recognised.</p> <p>In fact, they should be formally described and protected as other protected views are in London.</p> <p>The sites identified would hem in a considerable number of people - and take away their views - especially from Knights Hill ward and the area around Knights Hill road where thousands benefit from these long-reaching views every day.</p> <p>The retail area of Norwood Road lays in a valley: tall buildings would cast these into deep, cold shadow and make them less appealing as a shopping destination. Around 2018-20 a partnership with the local amenity group, the Norwood Forum, carefully managed the very expensive widening of pavements in Norwood Road to make the shopping experience better - and help to give better setting to cafes etc. The overshadowing and massing of these blocks will handicap this. The street contains small, independent shops, which have somehow managed to survive Covid and other planning and development impositions</p> <p>- just about. I'm sure the BID will be able to elucidate further.</p> <p>Lets not undo this good work with one planning hand undoing what the other planning hand has already done</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>These SAD PD plans do not suggest we would see narrow, tall buildings surrounded by open space or a town square - an open space on the Norwod Road would significantly benefit West Norwood. No instead it just masses and clusters in on the populace.</p> <p>The planning process uses maps which do not contain contour lines. So as well as being ignorant of the hemming in of residents, you are therefore ignorant of the accentuated effect that a tall building has - for every two or three metres it is set back, it goes up a metre. Therefore the effect is even more pronounced.</p> <p>One other argument advanced by developers has been that the density of people will add footfall to shops. As West Norwood and Tulse Hill each have a population 20,000s+ (depending on where you draw the line) the addition f a few hundred in a block of flats will make no difference.</p> <p>In fact, it just makes more impositions on the exiting infrastructure and road networks.</p> <p>Even though the sites identified would have a high PTAL of 5 or 6, due to the proximity of bus and trains routes, we should remember that these routes all go North to South. So, as well as the 30% or so of people whose business relies on their own private transport, anyone with work or family that's not en route to the City will consider a private car. Doubtless new electric charging infrastructure will also constrain vehicle use. The hilly nature of the town means that bicycles are only for the super-fit. The Tulse Hill site in particular is completely constrained for vehicle access, with railway underpasses and narrow residetial roads. So whether its private cars or delivery drivers, the road infrastructure is simply not up to it.</p> <p>So just because government directions say that you can identify areas where tall buildings can be built, does not mean to say that you MUST - especially if it means going back on commitments made just a few years.</p> <p>In summary - NO TALL BUILDINGS HERE.</p>	
Individual	R1055	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1057	Other	I live on York Hill, right in the middle of the two proposed sites: Site 18 & Site 19. I suggest that the proposals for Site 18 and Site 19 are ill-considered, out of scale with their immediate contexts and have not been developed with the local community and should be removed from this consultation. New plans should be developed with and reflecting the needs of the local community and neighborhood.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1059	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1060	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1062	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1065	Other	I am resident of West Norwood and I demand that the proposals of Site 18 and Side 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1066	Other	I am a resident of Elderwood Place in West Norwood and I strongly suggest the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Norwood Forum	R1067	Other	Because these proposals have been presented the wrong way round – ignoring plans developed through consultation without reasoning and fresh community input, we are conscious we have needed to present forthright criticism of the Council's Cabinet approved proposals in relation to Sites 18 & 19. We want to emphasise our willingness to work with the new May 2022 elected Council, and with the assistance of our new ward councillors, to develop alternative proposals that will meet the needs and aspirations of the local vibrant community.	Noted.
Norwood Forum	R1067	Other	We ask the Council to now formally withdraw Sites 18 & 19 from the SADPD, for the following reasons: • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement 2020 and in line with the Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD as agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the SADPD Proposed Submission Version. The report explains in detail the methods the Council used to raise awareness about the consultation and to encourage people to respond. The primary method used was Commonplace, the digital consultation platform used by the Council. Supplementary methods included engagement with ward councillors, local MPs, Area Meetings with representatives from community groups and organisations based in neighbourhoods with a site in the SADPD, presentations, and workshops with Young People. Ward councillors were engaged in meetings on 8, 9 and 16 December 2021, all held virtually following government guidance on the COVID-19 pandemic. Local MPs were briefed on 21 January and 1 February. Both ward councillors and local MPs were invited to join Area Meetings. The

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>Area Meeting for West Norwood was held virtually on 24 January 2022 following government guidance on the COVID-19 pandemic. Ward councillors, local MPs, as well as representatives from community groups and local organisations were provided with the information necessary to support residents in accessing the consultation material and encouraged to disseminate information about the consultation to the wider community. Council's own publicity and dissemination methods included i) notifications by email to over 2,000 contacts, including the statutory, specific and general consultation bodies required by the regulations, but also community stakeholders, ii) publications on social media platforms such as Twitter, Facebook, Instagram, LinkedIn and Nextdoor, iii) a blog post on Love Lambeth, iv) online newsletters and bulletins, v) physical copies of the draft SADPD displayed in public libraries, and vi) a dedicated website. The Council also notified up to 1,141 groups through Integrate, a directory of voluntary, community and social enterprise sector organisations that operate in the borough.</p> <p>Following the consultation, the Council organised three targeted stakeholder engagement workshops with representatives of the community stakeholder groups that had submitted responses to the Regulation 18 consultation on draft sites 18 and 19 in West Norwood/Tulse Hill. These were held over a six-week period in October and November 2022. These workshops provided an opportunity for Council officers and members to explore further the points raised in the Regulation 18 representations with local representatives. These workshops have helped inform the Council's consideration of the Regulation 18 consultation responses received and the resulting content of the SADPD Proposed Submission Version for Site 18.</p>
Norwood Forum	R1067	Other	<ul style="list-style-type: none"> • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • Unlike the other 12 Sites, Sites 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. 	<p>The scale of change proposed at Site 18 is not considered to be different to the other draft site allocations in the document. All 14 of the sites allocated in the Draft SADPD are considered to have significant regeneration potential and have been guided by the design-led approach set out in London Plan Policies D1 B(3) and D3, which seek to ensure the development capacity on the sites is optimised. This approach takes into account the unique context and characteristics of each site.</p> <p>The opportunity for extensive redevelopment on Site 18 has been signalled in planning policy since the adoption of the Unitary Development Plan in 2007. This has been carried forward through to the Local Plan 2021, where the site is allocated for mixed use development. Local Plan Policy PN7 F(i), when referring to Site 18, further echoes that 'in order to incentivise land assembly and comprehensive redevelopment opportunities the density of new development should be optimised'.</p> <p>Policy in the local Development Plan (comprising both the London Plan and Lambeth's Local Plan) has been subject to multiple rounds of consultation</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				and a public examination. The Draft SADPD must follow an approach consistent with the adopted Development Plan policy. Similarly, the approach to consultation must be consistent with national regulations and the Council's Statement of Community Involvement.
Norwood Forum	R1067	Other	<ul style="list-style-type: none"> This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes: It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. 	<p>The West Norwood and Tulse Hill: A Manual for Delivery document, published in 2017, and other Lambeth consultations in West Norwood have provided an extensive and valuable insight on local community aspirations and priorities, such as a desire to support the growth of the town centre and local businesses, provide new mixed tenure housing, improve public realm, pedestrian and cyclist permeability and public transport accessibility. The findings of the West Norwood and Tulse Hill: A Manual for Delivery document were, where relevant, reflected in Lambeth's Local Plan 2021 as supporting evidence and have informed the content of the Draft SADPD for Site 18. However, the quantum of development given by the Manual for Delivery was high-level and illustrative and did not include a detailed delivery plan based on a comprehensive feasibility assessment, which would have been the next step.</p> <p>The Manual for Delivery is not a planning policy document, therefore, the feasibility and viability of any development proposals that came forward following this document would have required further detailed assessment within the parameters of the Development Plan policy. Since 2017, economic, social and environmental circumstances have changed significantly. This means that the objectives for Site 18 need to be revisited and the current context for delivery of viable development needs to be taken into account.</p>
Norwood Forum	R1067	Other	<ul style="list-style-type: none"> The drafted proposals do not actively promote the Council's policy to address climate change. 	<p>Lambeth Council declared a Climate Emergency in January 2019. Mitigation of and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making.</p> <p>There is considerable existing Development Plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime.</p> <p>All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.</p>
Norwood Forum	R1067	Other	<ul style="list-style-type: none"> The overwhelming evidence is that the local community is against the plans for such massive over-development and destruction of our 	Noted. Please refer to the officer's responses to previous issues raised as part of this representation in relation to the protocol followed for the

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			existing town centre. If the Council chooses not to align itself with the wishes of its residents, we strongly advocate that the Council urgently communicates with all local people to explain its rationale for and likely impact of, its proposals for Sites 18 & 19. We believe the Council has a duty to reach all local residents via an extensive outreach programme (start now with a mail drop to all homes and follow all the methods in the Statement of Community Involvement 2020). The Council has been more effective with its communications on the Street Improvements to West Dulwich consultation than on this SADPD.	Regulation 18 consultation on the Draft SADPD proposals for sites 18 and 19.
Norwood Forum	R1067	Other	We are also submitting detailed representations against the SADPD proposals for Sites 18 & 19, on the behalf of our local community in Norwood. We have leafleted and spoken to hundreds of local people and have reached many thousands more via social media. We have supported and worked closely with local residents groups, churches, schools, individual residents and local businesses to make their own responses. Overwhelmingly the response has been one of complete surprise - and against these proposals. From the copies sent to us, we know that many local people have sent in written email objections and expect their comments to be carefully reviewed and a considered response sent in reply. Many others will have been unable to comment in the limited window available to them. The digitally excluded will be unaware of the proposals unless they were reached by one of our leaflets or our presence in the high street.	Officers will make all efforts to appropriately respond to representations made by local residents.
Norwood Forum	R1067	Other	Norwood Forum is a member of the Lambeth Forum Network. We are tasked to: "work locally to increase the voice of local groups and residents in local decision making". The Council did not approach us to promote these development plans apart from being invited to join the stakeholders briefing, and we have had to use our slim resources, already allocated in our annual budget, to produce leaflets, and to dig very deeply into the reservoir of volunteers in order to distribute them.	Noted.
Norwood Forum	R1067	Other	We trust the points we make below will result in serious engagement with the community to develop more acceptable plans in a co-operative manner.	Noted.
Norwood Forum	R1067	Other	As the Council is an influencer in addressing climate change, the proposals need to be reconfigured to ensure that all aspects reflect the green agenda. We do not understand why the proposals do not promote sustainability in an upfront way. We believe simply consigning sustainability to an appendix gives a poor impression of its importance. This should be at the heart of, and reflected throughout, the proposals.	Noted.
Norwood Forum	R1067	Other	We would expect these proposals to be redrafted to include a stipulation for sustainable construction and best practice working	All other Development Plan policies will apply to the site allocations as and when they come forward. For instance, London Plan Policies D3 and SI7

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			methods. Under the Government's flagship Environment Bill, Biodiversity Net Gain (BNG) will become mandatory for all planning developments in 2023. It aims to secure a 10% net biodiversity increase in all developments. Why is this not referenced in these proposals?	would apply to all planning applications submitted for the site allocations, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land), an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building. London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG further require referable applications to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are both strongly encouraged. National legislation will also apply to the site, including the mentioned Environment Bill. It is not considered necessary to repeat or list all of the development plan policies that will apply to the site allocations.
Norwood Forum	R1067	Other	Locally, we have led community plans to develop the concept of Norwood as a 15 minute neighbourhood, and are pleased to see this has been mentioned in the vision statement for Site 18 (but not for Site 19).	Noted.
Norwood Forum	R1067	Other	In November 2021 we organised a COP26Norwood event to coincide with COP26 in Glasgow, where we contrasted the high-level international debates with our own micro-local level discussions on the realistic and practical differences we could make as individuals. Read the report here. A COP27Norwood is to be held on 9 April. As Emma Howard Boyd, Chair of the Environment Agency described in her Forward to the Environment Agency, Chief Scientist's Group. (2021). The state of the environment: the urban environment: "How we finance urban resilience sounds like an ethereal, academic problem, but really it's a human one. The urbanist and author Jane Jacobs said: "There is no logic that can be superimposed on the city; people make it, and it is to them, not buildings, that we must fit our plans." The West Norwood and Tulse Hill community demands ambitious, environmental credentials for any development – whatever its scale.	Noted.
Norwood Forum	R1067	Other	We believe our town centre has a strong and unique identity that blends independent business with residential accommodation in heart of our	Noted.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>community. We have reached this enviable position organically and nothing in these new development proposals puts sufficient value on the sense of place that already exists in our neighbourhood. Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development.</p> <p>In their report Positive Economic Update on Performance of our High Street, Station to Station BID states: "Our high street has shown itself to be resilient, with lower vacancy levels, steady footfall and consistently higher spend in comparison to other areas within the borough". There is an excellent diversity of businesses. Most local people walk or cycle to the independent shops and small local nationals.</p> <p>Read more here: https://stationtostation.london/positive-economic-update-on-performance-of-our-high-street/.</p>	
Norwood Forum	R1067	Other	<p>Norwood Forum visited ten Norwood Road retailers who had asked for help to write their own response via Station to Station Bid. Whether lease holders or property owners they are all very angry not to have been told about these development proposals and are now extremely concerned about the uncertain future for their businesses. One retailer has finally just been offered a long lease – should he sign it? Another is about to start a development project – should they go ahead? A third owns several properties along Norwood Road and is astonished at the lack of contact from Lambeth. For all of them their businesses are their livelihoods and whilst some would welcome development, none are happy to have not even received an email or letter from the Council. Having suffered eighteen months of disruption from Thames Water, then the significant Covid impact on trading – only now is the economic situation finally beginning to look brighter, and all of them simply cannot believe that Lambeth would put forward these major and dramatic development proposals without a single attempt to directly inform them. Our local businesses have shown incredible resilience during extraordinary times and deserve to be treated professionally.</p>	<p>As stated in response to this and other representations, consultation on the Draft Site Allocations Development Plan Document was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020 and in line with the Consultation and Engagement Plan for the consultation on the Draft SADPD that was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the SADPD Proposed Submission Version.</p> <p>As part of this consultation process, ward councillors, local MPs, as well as representatives from community groups and local organisations were invited to the Area Meeting for West Norwood, which was held virtually on 24 January 2022 following government guidance on the COVID-19 pandemic. Attendants to this meeting were provided with the information necessary to support residents in accessing the consultation material and encouraged to disseminate information about the consultation to the wider community.</p> <p>Council's own publicity and dissemination methods included i) notifications by email to over 2,000 contacts, including the statutory, specific and general consultation bodies required by the regulations, but also community stakeholders, ii) publications on social media platforms such as Twitter, Facebook, Instagram, LinkedIn and Nextdoor, iii) a blog post on Love Lambeth, iv) online newsletters and bulletins, v) physical copies of the draft SADPD displayed in public libraries, and vi) a dedicated website. The Council also notified up to 1,141 groups through Integrate, a directory of voluntary, community and social enterprise sector organisations that operate in the borough.</p> <p>Following the consultation period, the Council organised three targeted</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>stakeholder engagement workshops with representatives of the community stakeholder groups that had submitted responses to the Regulation 18 consultation on draft sites 18 and 19 in West Norwood/Tulse Hill. These were held over a six-week period in October and November 2022. These workshops provided an opportunity for Council officers and members to explore further the points raised in the Regulation 18 representations with local representatives, including local businesses. These workshops have helped inform the Council's consideration of the Regulation 18 consultation responses received and the resulting content of the SADPD Proposed Submission Version for Site 18.</p> <p>Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected. If compensation to businesses is considered necessary, this would be a matter between a tenant and their landlord, in accordance with the terms of any lease.</p>
Norwood Forum	R1067	Other	<p>The proposals need to state the Council recognises past difficulties in Lambeth (and elsewhere) in securing agreed levels of “affordable” housing. Innovative interpretations of legislation is needed to ensure the agreed levels are actually delivered by the developer.</p> <p>A simple explanation as to the meaning of “affordable” would have been welcome. Furthermore, a statement of the number of affordable units (rather than a percentage) would have provided a level of transparency that is missing throughout the documents.</p> <p>We appreciate that new housing is desperately needed, but it has not been possible with the information provided to understand the extent to which these developments will really meet and reduce local need.</p>	<p>Regarding affordable housing provision, the Draft Site Allocations Development Plan Document refers to existing Development Plan policy (both the London Plan and Lambeth's Local Plan). The London Plan contemplates two routes; a) the Fast Track Route for those applications that provide a threshold level of affordable housing and meet the other relevant criteria, and b) the Viability Tested Route for applications that do not provide those thresholds. This approach is consistent with the plan-level viability assessments undertaken to support the examination of both the London Plan and Lambeth's Local Plan.</p> <p>The Draft SADPD policy sets out the affordable housing thresholds that will apply to the different parcels within the site, depending on whether the land is privately (35 per cent of all residential units should be affordable) or publicly owned (50 per cent of all residential units). However, if the applicant cannot meet this threshold or fails to meet the other relevant criteria, the scheme will be viability tested to ensure that an applicant provides the maximum possible amount of affordable housing.</p> <p>The term ‘affordable housing’ in London refers to two categories of affordable housing; 1) low-cost units, which include Social Rent units, also known as “council”, and London Affordable Rent units, and 2) intermediate units, which refer to London Shared Ownership units and London Living Rent units. Following the Development Plan policies, 70 per cent of the total number of affordable residential units proposed as part of a major scheme should be low-cost units while the remaining 30 per cent should be</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				intermediate units. The potential of this site to provide affordable housing will be tested at the time of a planning application being considered. Therefore, it would not be considered consistent with London Plan policy to add a number of proposed affordable units to the Draft Site Allocation policy.
Norwood Forum	R1067	Other	We do not feel the Council has provided the necessary leadership in the past so as to ensure previous plans were implemented. The Council's apparent inaction has meant the West Norwood and Tulse Hill community has suffered from the large area at Site 18 remaining a blighted vacant site which should already have been developed for housing (including affordable), work/live units, business and retail units. The Council should have brought together the various owners and led the agreement of a programme to implement previous plans. Ultimately, it could have used its CPO powers to ensure the plans developed following consultation and in place were actually implemented.	Noted.
Norwood Forum	R1067	Other	Furthermore, the Council has not explained why these proposals do not reference the previous 2009 West Norwood Town Centre Master Plan, the 2016 A Plan for West Norwood and Tulse Hill: Community Evidence Base Report, or the 2017 West Norwood and Tulse Hill: A Manual for Delivery. Specifically why has the 2017 Manual for Delivery become obsolete and replaced by the current proposals? These plans were not perfect but were at least developed to some degree with the community so it is particularly frustrating for there to have been no explanation or willingness to reopen a dialogue.	<p>The West Norwood Town Centre Master Plan was adopted in April 2009 to support the aspirations of the 2007 Unitary Development Plan (UDP). Since 2009, however, economic, social and environmental circumstances have changed significantly. The UDP has since been superseded by the 2015 Local Plan and subsequently by the 2021 Local Plan and the Town Centre Master Plan has been withdrawn. Where relevant, the findings and aspirations of the 2009 Master Plan were reflected in the 2011 Core Strategy and 2015 Local Plan as supporting evidence.</p> <p>As stated in the response to other points raised as part of the Norwood Forum representation, the West Norwood and Tulse Hill: A Manual for Delivery document, published in 2017, and other Lambeth consultations in West Norwood have provided an extensive and valuable insight on local community aspirations and priorities, such as a desire to support the growth of the town centre and local businesses, provide new mixed tenure housing, improve public realm, pedestrian and cyclist permeability and public transport accessibility.</p> <p>The findings of the West Norwood and Tulse Hill: A Manual for Delivery document were, where relevant, reflected in Lambeth's Local Plan 2021 as supporting evidence and have informed the content of the Draft SADPD for Site 18. However, the quantum of development given by the Manual for Delivery was high-level and illustrative and did not include a detailed delivery plan based on a comprehensive feasibility assessment, which would have been the next step.</p> <p>The Manual for Delivery is not a planning policy document, therefore, the feasibility and viability of any development proposals that came forward following this document would have required further detailed assessment within the parameters of the Development Plan policy. Since 2017,</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				economic, social and environmental circumstances have changed significantly. This means that the objectives for Site 18 need to be revisited and the current context for delivery of viable development needs to be taken into account.
Norwood Forum	R1067	Other	<p>We expect world class urban design that recognises West Norwood and Tulse Hill as an existing viable, successful, neighbourhood with an enviable strong sense of community. We do not want to see a swathe of “developer architecture”, but an ambitious incremental development with the community as an equal partner in an exemplary approach to town centre redesign.</p> <p>Where is the reference to the London Mayor’s Good Growth by Design programme that: “seeks to enhance the design of the built environment to create a city that works for all Londoners. This means development and growth should benefit everyone who lives here. As such, it should be sensitive to the local context, environmentally sustainable, economically and socially inclusive, and physically accessible.” This is a readymade framework of six parts that includes “Setting Standards”. We expect nothing less for our neighbourhood.</p>	<p>The Draft Site Allocations Development Plan Document was informed by high-level testing of the optimum scale and massing that could be accommodated on site. In response to this and other representations received in the course of the Regulation 18 consultation, the boundary of the site has been modified and the proposed indicative scale and massing revised. These changes are reflected in the SADPD Proposed Submission Version.</p> <p>Detailed proposals, including architectural design, will be put forward by applicants as part of planning applications for the development of each of the parcels within the site. Following the standard planning application process, such proposals will be assessed against Lambeth Development Plan policy and guidance, including the London Plan, Lambeth’s Local Plan and the Site Allocations Development Plan Document when adopted.</p> <p>As indicated in Lambeth’s Statement of Community Involvement, the planning application process offers further opportunities for community involvement. These opportunities include opportunities for community involvement led by the developer or applicant, who are encouraged to engage with the community and stakeholders before submitting any application. The planning application process also allows for members of the community and community groups to submit representations during the planning consultation period open for all planning applications, which normally lasts 21 days. Anyone can respond to a planning consultation regardless of whether they are specifically consulted or not. Any interested parties are encouraged to register with the Lambeth’s Planning Applications Database in order to be notified about applications in their area or any part of the borough they are interested on.</p>
Norwood Forum	R1067	Other	<p>Given West Norwood has lost two large artists’ studios in recent years (Bainbridge Studios and East Place), and the inclusion of a culture quarter in the Local Plan (and in the 2017 Manual for Delivery: as the West Norwood Heritage and Cultural Area, why is there no ambition to put Art and Artists at the heart of the proposals? See achievements by LB Barking & Dagenham as an example of what can be accomplished with vision: www.theguardian.com/artanddesign/2021/dec/09/made-in-dagenham-the-artist-homes-designed-to-slow-gentrification</p>	<p>The Draft Site Allocation DPD policy identified ‘a particular opportunity to provide flexible workspace for creative businesses, to enhance the growing cluster in West Norwood and Tulse Hill’. The revised version of the policy wording included in the SADPD Proposed Submission Version continues to recognise this opportunity.</p>
Norwood Forum	R1067	Other	<p>Forward Plan entry: the Council has not ensured local people were informed of the important key decision to be taken as an opaque title was used for the Forward Plan entry, there was no advice that Knight’s</p>	<p>Lambeth’s Local Plan, adopted in September 2021, already included Site 18, along other ten sites, as a site allocation (please refer to section 11, Policy PN7: West Norwood/Tulse Hill). Point 1.6 of the Local Plan stated</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Hill ward would be affected through plans for large-scale demolition and redevelopment, and the published list of background documents did not include any reference to the key previous documents we list in section 4. Ambition.	<p>that additional site allocation policies would be brought forward in a subsequent Site Allocations Development Plan Document.</p> <p>The Forward Plan of Key Decisions made public on 6 December 2021 included an entry titled 'Regulation 18 draft Site Allocations Development Plan Document' that gave details of the issue to be discussed during the Cabinet Members Meeting to be held on 13 December 2021. This issue was 'to agree to commence consultation on the Regulation 18 draft of the Site Allocations DPD which will eventually, on adoption, form part of the statutory Development Plan for the borough'. This entry also gave information on the issue history, related decisions and related meetings. It was also possible to access the documents to be discussed during the Cabinet meeting, including the Draft Site Allocations DPD subject to consultation.</p> <p>The Draft SADPD stated the vision for Site 18 and recognised the potential for the redevelopment of site to accommodate approximately between 390 and 470 self-contained residential units (gross) and between 5,000 and 7,000 sqm GIA of commercial/community floorspace. The site allocation for Site 18 also indicated the height of future buildings within the site could range between 15 and 21 metres, with the central part of the site being appropriate for a tall building of a general building height of 36 metres.</p> <p>The Draft SADPD referred to a total of 14 sites, two of which, Site 18 and Site 19, were located in Knight's Hill ward.</p>
Norwood Forum	R1067	Other	Lack of pro-active pre-decision notification: why did Lambeth not inform the communities affected via the council-funded Lambeth Forum Network? This should have been done prior to publishing the Cabinet report or on publication of the report (or even immediately after the Cabinet approval on 13 December). In fact it took until 6 January 2022 to notify Norwood stakeholders and offer an online briefing. This was held on the earliest possible date offered by the Council of 24 January. The stakeholder group was therefore given less than four weeks to activate the community and respond following this briefing.	<p>The decision made at Cabinet on 13 December 2021 was to commence consultation on the Regulation 18 draft of the Site Allocations DPD. Such consultation run from 11 January to 22 February 2022.</p> <p>As indicated in other responses to the representations made by Norwood Forum and other consultees, a full report of the Regulation 18 consultation will be published alongside the SADPD Proposed Submission Version. The report explains in detail the methods the Council used to raise awareness about the consultation and to encourage people to respond. Responses to other points raised as part of this representation explain these methods in further detail.</p>
Norwood Forum	R1067	Other	Statutory consultation: Lambeth states it is engaged in Regulation 18 consultation which commenced on 10 January 2022 and will finish at 11pm on 22 February 2022. Given the above paragraph, we do not accept the Council has met the requirements of Regulation 18.	<p>Regulation 18 of The Town and County Planning (Local Planning) (England) Regulations 2012 refers to the preparation of local plans, and for extension, the preparation of site allocations development plan documents when a Local Planning Authority (LPA) opts for bringing site allocations forward separately. It refers to the obligation a LPA has to notify relevant bodies or persons of the subject of a development plan document the LPA proposes to prepare, and invite them to make representations to the LPA about what a development plan document with that subject ought to contain.</p> <p>Relevant bodies or persons include; i) specific consultation bodies the LPA</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>considers may have an interest in the proposed development plan document, ii) general consultation bodies the LPA considers appropriate, and iii) residents and other persons carrying on business in the LPA's area the LPA considers appropriate to invite representations.</p> <p>Regulation 18 also states the LPA must take into account any representation made to them. Representations made by Norwood Forum as well as other consultation bodies, residents and other persons have been taken into account for the preparation of the SADPD Proposed Submission Version.</p>
Norwood Forum	R1067	Other	<p>Informing the public: we object to the Cabinet approved minimum methods of advising local people about the proposals. The limited consultation will be further limited in its impact due to the continuing use of "draft SDAPD" and not a clear statement about what this means (see above). The report states that consultation will be promoted widely through a database of those who have asked to be kept informed of planning policy consultations. Other targeted emails and online council website promotion will be undertaken. This is inadequate when the proposals have such a potential huge impact on our town centre. We understand that the residents and businesses at buildings proposed to be demolished at both Sites 18 & 19, let alone the close neighbours, have not been informed of their rights to object and offer comments. We find it most regrettable that the Council has not reached out to them to explain the possible scenarios and timescales, and offer tangible and ongoing advice over what is likely to be a long timescale full of uncertainty.</p> <p>Consultation methods and timescale: the Cabinet report quotes the Council's own consultation policy: Statement of Community Involvement 2020 but does not explain why the laid down processes and timescales set out in that document, only updated in October 2020, are not being followed. There is limited online activity and copies placed in libraries only. The Council is not working collaboratively with the local community, partners and interested parties. There is no evidence at all of engaging with groups who do not traditionally engage in planning. Tried and tested ways of engaging people have not been used: e.g. public meetings, participatory workshops, public exhibitions, posters, leafleting, questionnaires, attending local society meetings - and an adequate timescale to undertake these activities. None of these methods is prevented by current or pending Covid-19 requirements. In fact it is clear no resources have been directed to achieve community involvement. This is a particularly important consideration for Sites 18 & 19 as the Council's proposals here have a much more severe impact on</p>	<p>Officers welcome the detailed feedback on the running of the consultation process. These comments will be useful to inform future consultation. Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement 2020. As you are aware, the Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021.</p> <p>The consultation process has been briefly explained in response to other points raised as part of your representation. A full report of the Regulation 18 consultation process will be published alongside the SADPD Proposed Submission Version.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			the neighbourhood and town centre than those for all other Sites (in short: scale of development/height/density/construction period).	
Norwood Forum	R1067	Other	<p>Other communication methods: the Council should have published the developing proposals over the period since we understand the proposals first appeared in the forward plan in December 2020. For instance a series of articles could have been published on the Love Lambeth website and in Lambeth Talk; these could have given Site specific explanations for the developing proposals for each Site on a ward by ward basis and sought community involvement. Due to the pandemic public workshops and meetings were impossible at certain times; this makes it all the more regrettable that the Council did not have any intentions of engaging with local communities through imaginative methods and those included in the Statement of Community Involvement.</p> <p>Key stakeholder group meetings to be held in different parts of the borough during the six week consultation period: as mentioned above this was not held until 24 January (and this was the first in the borough). The format of this online Teams meeting was of officers telling us the background (which we knew already through reading the Cabinet report) via a 45 minute PowerPoint presentation, and was something we had specifically asked not to be done. There was therefore only limited opportunity for oral responses to a series of written questions we submitted beforehand in order to maximise the efficient use of the limited time available. We feel the online nature of the meeting was not conducive to developing our mutual understanding of the issues and our community. For instance we do not know why the 2017 Manual for Delivery is not to be pursued, and if it has any remaining status. One advantage of an online meeting would have been for this to be recorded and made available for all to view afterwards. We asked for this in advance, but received no response and were then told at the meeting it was not possible. We were grateful for the short written answers provided the next day to our written questions. These answers often suggested we raise the questions during the consultation process, and these are therefore included in these representations.</p>	Please refer to officer's response to the previous point made in your representation.
Norwood Forum	R1067	Other	<p>Covid-19: the pandemic has had a major and likely permanent impact on people's work, shopping and recreational patterns. This factor alone means the Council is duty bound to explain how it believes its previous plans have been affected and consult afresh. There should be an explanation of the changes made to proposals in light of the extensive switch to home working. Will all flats be required to include a work space? There is no mention in the Cabinet report or consultation documentation of major social change being factored in.</p>	Please refer to officer's response to the previous point made in your representation.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Commonplace: for some time the SADPD Commonplace pages were not listed on the main Commonplace map – this further reduced the time that people could comment as there is no search facility on this website and unless you have the link to a particular consultation it can be very hard to find it. The SADPD consultation sought to further complicate the process by not using the typical map format but instead offering 7 different chapters of information for each site to comment under.</p> <p>For all the above reasons, proper consultation has not been held, and the proposals must be removed from this current SADPD consultation.</p>	
Individual	R1069	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1070	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1071	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1072	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1073	Other	I am a resident of West Norwood and demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1074	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1075	Other	<p>I have viewed the proposals for Sites 18 and 19, which I only found out about thanks to Norwood Action Group and Norwood Forum.</p> <p>I have lived in West Norwood for over 30 years and consider that the proposed development on both sites is totally out of keeping with the area, in particular the high density housing and the 11 and 22 storey blocks. I also oppose the loss of businesses on the existing high street and the visual impact of the proposed development.</p> <p>There appears to have been little or no advance notice of or consultation on the proposals. I therefore think that the proposals for both Sites 18 and 19 should be removed from the consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1076	Other	I am a West Norwood resident and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1078	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1080	Other	<p>I am writing to object to the development plans in three current form in respect of both Site 18 and Site 19.</p> <p>I have been a resident of west Norwood for over 32 years and watched the significant improvement made to the area over that time and experienced first hand the benefits to the local community. There are undoubtedly still improvements to be made, which some well thought out and sympathetic redevelopment would bring. However the current proposals for Site 18 and Site 19 are neither well thought out nor sympathetic to the area and they would reverse those gains made over recent years. They are unacceptable for the reasons set out below.</p> <p>Site 18</p> <ol style="list-style-type: none"> 1. There has been wholly inadequate consultation with the public. There is a strong and diverse community in West Norwood and it quite wrong for Lambeth to proceed with such major plans without proper consultation with members of the public who live and work here. Such consultation as there has been is totally inadequate. 2. A development on such a massive scale will completely ruin the the character of the local area. Yes, the shop frontages do need to be improved but they should not be destroyed or those businesses take away. 3. The construction of such massive high rise building would be out of keeping with the locality and contrary to vision for West Norwood and Tulse Hill which was the subject of public discussion in the past. 4. The Lambeth Local Plan refers rightly to promoting community cohesion and creating and maintaining attractive places. There is absolutely no evidence that these proposals, such is their scale, would achieve either objective for West Norwood. Indeed, common sense and a proper understanding of the local area indicate precisely the opposite. 5. Replacing 25% of the existing town centre with high density plans that include huge residential blocks and and an 11 storey tower is wholly inappropriate and must surely contravene Lambeth's own planning rules. <p>My objections are not about resisting any development at all or any changes. Rather they seek to remove these plans from the current consultation process and replace them with new plans which to be drawn up in proper consultation with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1081	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1082	Other	<p>I live on Knollys Road (184), and passionately believe Site 18 and Site 19 should be removed from this draft. The impact of this proposal is as follows;</p> <ul style="list-style-type: none"> - Knollys Road can not accommodate large quantities of additional cars and the air quality for residents will suffer - The additional traffic that it is likely to produce along the roads encourages reckless driving - a car was flipped on its side recently - The high rise nature of the developments are not in keeping with the local architecture. - Local wildlife will be affected negatively, such as stag beetles which are frequently seen on the road. - The loss of key businesses would have a detrimental impact on the community 	Please refer to the general response to representations made by individuals and businesses.
Individual	R1083	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community that are in keeping with the existing heights and character of surrounding buildings.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1084	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1085	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1086	Other	<p>I am writing as a long-term resident of West Norwood to demand that sites 18 & 19 be removed from the SADPD as there has been almost no appropriate consultation with the local community or detailed consideration of the short or long term impact on the neighbourhoods and town centres of Tulse Hill and West Norwood.</p> <p>Plans that are so out of scale with the local area will have a devastating impact and should never be considered without extensive consultation with those that are affected.</p> <p>Surely better plans and outcomes can be achieved with more thought and collaboration, creating a good environment for all. New homes can have a positive impact and contribute to regeneration, but unfortunately the current plans risk damaging the area and failing to provide the quality and type of homes, and local environment, that families need.</p> <p>Allowing plans on this scale and density would be both devastating and a lost opportunity with massive long term impact.</p> <p>Impact locally includes:</p> <ul style="list-style-type: none"> - destroying character of the local area - dwarfing the surrounding buildings to an extreme extent - reducing daylight and visibility/views 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<ul style="list-style-type: none"> - significantly changing the skyline in an unattractive way - increasing congestion in an already cramped area that is hemmed in by geography, railway lines and the Streatham (& Future West Dulwich) LTNs. As a pedestrian, walking in the area is already becoming increasingly polluted as a result of traffic fumes being concentrated on the most direct routes. - destruction of recently constructed buildings such as the new flats above the Iceland store on Norwood road. <p>Please do not allow these extreme and unsympathetic plans, there are much better ways of achieving housing objectives</p>	
Individual	R1087	Other	I am a resident of West Norwood and I ask that the proposals for Site18 and Site19 are removed from the planned consultation and new plans developed consulting me and the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1089	Other	I live in West Norwood and want to show my objections to the above proposals. Please reconsider as these will alter this are completely.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1090	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1091	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1092	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1093	Other	I am a resident of Lambeth and I demand that the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1095	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1096	Other	I am a resident of West Norwood and I feel that the proposals for Site18 and Site19 should be removed from this consultation and new plans developed with the local community. The current plans seem to be out of keeping with the local area and would harm many valued local businesses. There is also a desperate need for affordable housing and I would like to be assured that a significant proportion of the development would be affordable for local people.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1097	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1098	Other	I am a resident of West Norwood and I object to the ill conceived and insensitive proposals for site18 and Site 19 in our high Street . This development will not only destroy the character of the whole area but will have a negative impact on our environment- businesses as a consequence will be destroyed with significant job losses. I therefore demand that these proposals are removed and that new plans are put forward which will be to the benefit of the community as a whole . We have to protect our high street and our environment - this ill conceived proposal is not the way forward- it is a very flawed vision	Please refer to the general response to representations made by individuals and businesses.
Individual	R1099	Other	I am a resident of Lansdowne Hill, West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new, more appropriate, plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1100	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. This buildings are far too tall and too close to the high street which needs love and attention.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1101	Other	I am a resident of West Norwood, I live here my family and have young children. The proposals for Site18 and Site19 would do nothing good for our community and should be removed from the consultation. I'm not against developing the area but it's obvious current proposals are not acceptable, new plans should be developed and they must include the views of the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1102	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1103	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1104	Other	I am a resident of West Norwood and I demand the proposals for site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1105	Other	I am a resident of West Norwood and I demand that the proposals for Sites 18 and 19 be removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1106	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1107	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1108	Other	I'd like to demand that these sites are removed from the consultation. They are entirely out of keeping with the suburban surroundings, will	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			increase pressure on already stretched local services and, as a resident of the already very busy Lancaster Avenue, add to traffic congestion. Site 18 particularly will be a blight and entirely destroy the character of the local area.	
Individual	R1109	Other	I am a resident of West Norwood and I demand the proposals for Site 18 & Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1110	Other	I am a resident of West Norwood. I am deeply concerned that the proposals for Site 18 and 19 have not been developed with the local community. I urge the council to remove these sites from this consultation and put resources into developing new plans with and for the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1111	Other	I am a resident of West Norwood and I demand the proposal for Site18 + site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1112	Other	I wish to add my voice to those who have objections to these building proposals which will transform the character of an area which after years of effort has become an attractive and thriving home for locals, business, tourists and nature.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1115	Other	I am a resident of West Norwood and I demand the proposal for Site18 + site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1116	Other	I am a resident of West Norwood and I ask that the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed within the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1117	Other	<p>I am writing to object strongly to these proposed developments which are completely at odds with the buildings in these areas and which have been snuck through without proper consultation with residents. There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact. This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes:</p> <ul style="list-style-type: none"> • It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>stated their desire and commitment to being part of future delivery. The way this proposed development has been rushed through is in clear and total contravention to the ethos and approach outline above. West Norwood is a wonderful, diverse community with people from every background and ethnicity. I know all my neighbours and there have been street parties in my road - Thurlby - for the last five years. This is a community which stands together and which is very proud of this area. You will not find it an easy community to bulldoze over. I wish to be part of the consultation you are going to need to have with WN residents before making plans for developments which affect our area.</p>	
Individual	R1118	Other	I live in West Norwood. I strongly request that proposals for Site 18 and 19 are redeveloped in consultation with the local community representatives.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1119	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1120	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1121	Other	<p>I am writing to demand the removal of sites 18 & 19 from this consultation.</p> <p>Until a community based proposal has been properly discussed within the community and approved by those who's lives would be most affected by the construction in/on this area. It is likely that any proposal such as this that is attempting to get approval in a somewhat Machiavellian manner, (by not being publicised sufficiently given its scale and potential local impact) there will be huge mistrust and public push back.</p> <p>The proposal for any buildings on this site should be properly established within genuine community needs. At the same time as acknowledging the areas current wide and varied functions.</p> <p>To achieve this, the community should be acknowledged and needs to be a part of the advisory board of proposed projects. To highlight and give guidance to the needs of the huge variety of people within the area.</p> <p>There is no doubt that there is land that could be developed. To which the community would have a vital and invaluable take on what is both needed and would best serve them to grow and enrich the area.</p> <p>There is no doubt that growth in and around south london is necessary, however this is not the way to go about gaining the general public's backing.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Remove sites 18 & 19 from this consultation and establish a genuine dialogue to bring together a positive balanced approach to working up proposals for these sites that will enhance and benefit the local area.	
Individual	R1122	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1123	Other	<p>I am a local resident and frequently visit the area that includes Site 18. I object to the proposed planning guidance for Site 18 as a whole because it incites the wholesale destruction of existing property, most of which is already being used for positive purposes, although in some cases would benefit from repair. I particularly object to these specific aspects of the plan.</p> <ol style="list-style-type: none"> 1. Redevelopment of the building whose ground floor is currently used by Iceland would involve the destruction of nine flats built with planning permission about 2015. This would be a gross waste of resources and not be consistent with Lambeth's "green" agenda. 2. Releasing space to widen the pavement of Norwood Road is not sufficient justification to destroy the existing buildings along that frontage. 3. The community at All Nations Christian Centre meets in premises at 15 York Hill, between Thanet House and the playground on the York Hill estate. Destruction of that building without a planning requirement to replace it conflicts with Policy S1:B of Lambeth Local Plan 2020-2035. 4. The terrace of six shops with two floors above which stands in Norwood Road between the two turnings into Waylett Place is the oldest significant shopping parade in West Norwood. These buildings, now numbered 336-346 (even) Norwood Road, are shown on the 1870-vintage Ordnance Survey map and clearly of historical interest as well as providing extensive retail and residential accommodation. 5. The precinct proposed to face Chatsworth Way is superfluous as there is plenty of space for those who want to sit in the open air in the nearby gardens immediately north of St Luke's church. 6. The 12-storey block to the west of the proposed precinct would have poor accessibility in case of fire or another emergency. 7. No thought appears to have been given to the appearance of the proposed development when viewed from the York Hill estate or its adverse effect on the setting of St Luke's church when seen from that direction. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R1124	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1125	Other	I am a resident of West Norwood (Lansdowne Hill) and my children go to school on Leigham Vale. I am strongly opposed to both sites 18 and 19 and I demand that the proposals are removed and new plans are developed with local community input. Development and housing are not bad per se, but forcing through plans without local approval of the people in the community is not appropriate. There are many reasons I oppose both sites, including, but not limited to, ruining the community feel and aesthetic of West Norwood and the appalling traffic and parking problems that we already have, exacerbated by these proposals.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1126	Other	I am a Resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1127	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. The proposed site is monstrous in size and in no way meets our criteria for housing. It is not viable for affordable housing, will destroy the character of the area, will see numerous longstanding viable businesses close, cause increased pollution due to more cars, destroy local wildlife, and is in whole a poor solution to our housing crisis. People do not want to or need to live in multi story blocks - have we not learnt our lessons from the 1960s planning disasters. It's appalling this is being considered. This needs rethinking urgently before we ruin our neighbourhood. I believe the original plans were for a maximum of 6 stories. Please draw up sensible plans for housing that is affordable and will create a harmonious neighbourhood for existing and new residents alike.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1128	Other	I am a resident of West Norwood and I demand that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1129	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1132	Other	I really feel there has been too little consultation about this! Particularly sites 18/19. I am a local resident who will certainly be impacted and have found out 2 hours before the deadline - without any time at all to look at plans and comment.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1133	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1134	Other	I strongly object to the proposals I have seen for site 18 and 19. I am a resident of west Norwood and have just signed my son up for	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			school in the local area. We will seriously reconsider our place in the community if these go ahead. Devastated	
Individual	R1135	Other	I am a resident of West Norwood and I am concerned about the Site 18 and Site 19 development proposals. In particular, I am concerned about the lack of community consultation and input into the development proposals, especially given the scale of the proposed developments. I demand that the proposals be removed from this consultation and that new plans be developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1137	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1138	Other	I live on York Hill, between and directly adjacent to the two proposed site allocations: Site 18 & Site 19. I believe the proposals for both Sites 18 and 19 are poorly considered, wholly out of scale with their immediate and broader context and have not been developed with any consideration of the local community and in fact seems wholly at odds with them. These proposals are so utterly out of scale and provocatively ill considered I believe they must be removed from this consultation and new plans developed that involve the community as a starting point. A meaningful collaboration is required that reflects the needs of community its identity and the suburban grain of the neighbourhood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1139	Other	I am a resident of West Norwood and I ask that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1140	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1141	Other	We have just been notified of the proposed planning sites 18 and 19 and are alarmed at what is being proposed by Lambeth without community consultation and due diligence - sites that will radically change and impact our neighbourhood, local schools, businesses, traffic not to mention the sheer height of some of them, totally out of keeping with the rest of West Norwood and neighbouring areas. We ask that it be removed from this process and proper community consultation is followed.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1142	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1289	Other	I am a resident of Knollys Road and I demand the plans for Site 18, and Site 19 are removed from the SADPD consultation and new plans	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			actually developed with the community rather than shoehorning in two completely unsuitable, ill thought out proposals very close to each other. The overdevelopment of both developments are completely out of context and would destroy the character of the quiet, low-rise nature of the West Norwood neighbourhood. Please take them off the SADPD and work with us to develop something that is actually beneficial to our local area	
Individual	R1316	Other	I expect that this e mail will be either the first or last of many that you will have received on the draft SADPD objecting to the West Norwood town centre and Knolly's Yard proposals/ I am a resident of West Norwood for 20 years with family connections stretching back another 10 years I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. Please don't blight a place which I care and value with an ill thought out, poorly researched, inadequately evidenced and unrealistic set of proposals which will impact so severely the 80 families and other households who would lose their homes and the 40 local businesses which would also go, all those residents living nearby and the traders elsewhere in the town centre but West Norwood as a whole . Please do start afresh and work with local people – residents, businesses and others with interests to come up with a realistic, deliverable and inspirational set of proposals which can deliver affordable homes for local people, a vibrant and viable town centre, many local jobs and a place of which we can all be proud. I am also a professional town planner with over 40 years of experience starting with Lambeth. The proposals for West Norwood town centre and Knolly's Yard are not good growth nor are they good planning. Please try again and this time involve local people.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1147	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1246	Other	I am a resident of West Norwood and I demand the proposal for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0029	Other	I have tried to put my comments on the Commonplace site but it's so user unfriendly that it's impossible to do so. My first lot of comments disappeared and I didn't ever receive the email that would act as a link so I could send my comments. Maybe this is so that people get so frustrated that they don't bother to leave any comments at all. The fact that this proposal was kept so secret that not even the Councillors had any idea about it until the December meeting rings very loud alarm bells. It is unpopular, and has been kept secret so that it could slip	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>under the radar and be a 'fait accompli'.</p> <p>Site 18</p> <p>The design is totally out of keeping with the rest of West Norwood. It's ugly, it's huge and it's far too tall. The usual flannel is being aired, that it will mean some affordable homes for local people. From past experience of these sort of projects it will probably provide nothing of the sort as it will be too expensive for most local people. Tall buildings South of the South Circular are defined by Lambeth as above 25 metres, yet the proposed buildings will be between 68 and 70 metres. The building work will be done in phases so Norwood Road will be a building site for years to come. I'm not against progress but this proposal is not progress but a travesty of what West Norwood needs.</p> <p>I AM A RESIDENT OF WEST NORWOOD AND I DEMAND THE PROPOSALS FOR SITE 18 AND SITE 19 ARE REMOVED FROM THIS CONSULTATION AND NEW PLANS DEVELOPED WITH THE LOCAL COMMUNITY.</p>	
Individual	R0271	Other	<p>I am writing this email as I am opposed to the developments (site 18 and 19). The local community ought to be consulted.</p> <p>How are we going to reduce air pollution if there is an increase in traffic ?? Public consultation please</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1143	Other	<p>I am a resident of West Norwood living in SE27 very, very close to this proposed development and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1145	Other	<p>I am a member of the Lancaster Avenue Residents Association and I have recently been informed of the plan proposed by Lambeth Council to permit the building of two tower blocks; one in Norwood Road opposite the end of Lancaster Avenue and one in Knollys Road. Both of these will have an immediate adverse impact on Lancaster Avenue including volume and size of traffic. Both will have an adverse impact on the amenities in Norwood Road particularly during the building process and also after the building is complete. Lancaster Avenue will inevitably see an increase in traffic and a demand for parking which it does not have facilities for. West Norwood will suffer blight until the buildings are complete. I have no objection in principal to the development and improvement of sites within West Norwood for residential purposes but strongly object to plans which would, if allowed, constitute over development with no real concern for the residents of West Norwood or for any infrastructure in the area. These proposals, if allowed, will be entirely out of keeping with the whole area of West Norwood and in particular Lancaster Avenue. As such they appear to be contrary to all previous policies of Lambeth Council including the designations of</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Conservation Areas and houses of Historic Interest. I fully support The Norwood Forum, Norwood Action Group and Norwood Planning Assembly in their objections to these proposals.</p> <p>My principal objections are:</p> <p>The over intensive use of the site producing exceptionally high levels of traffic, and</p> <ul style="list-style-type: none"> · The locations of the sites and road access to them is not suitable, and · The inevitable significant increase in larger vehicles traveling to and from the site along roads that are unsuitable for such levels of, and types of, traffic resulting in negative environmental effects of congestion and pollution. The idling of lorries queuing to access the proposed sites from Lancaster Avenue and elsewhere will most certainly affect all residents and non-residents using facilities situated in Lancaster Avenue especially those attending the nursery and the school, and · Lancaster Avenue already suffers from excessive numbers of HGVs and other traffic causing noise, vibration and air pollution. LARA has made representations about this on a number of occasions and the problems are likely to get substantially worse as the introduction of the ULEZ, local LTNs and other road closure schemes come into effect. These new proposals from Lambeth Council would substantially increase the level of HGVs and other waste carrying vehicles using Lancaster Avenue and will increase all resulting problems. <p>I have some specific requests that should be implemented:</p> <ul style="list-style-type: none"> · Site 18 and Site 19 of the Development Plan must be struck out from it, and · Lambeth Council should abide by the five-year 2021 Lambeth Local Plan, and · Lambeth Council should abide by its previously published policy for tall buildings south of the South Circular, and · If these proposed plans or any variation of them should be contemplated they should be “plan led” and should be “part of a comprehensive scheme that integrates well with the locality” including, but without limitation, Lancaster Avenue. 	
Individual	R1148	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1149	Other	I am a resident of West Norwood and I ask that the proposals for Site 18 and Site 19 be removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1150	Other	We have serious concerns about this development and we feel that the community has not been appropriately consulted. We demand that the	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			proposals for site 19 and 18 are removed from the current consultation and new plans are developed with the local community.	
Individual	R1152	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1153	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1154	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1155	Other	I strongly oppose the building of proposed property in West Norwood - Site 18 and 19 for many many reasons lest of all the impact it will have on parking, traffic congestion and the intake for the local schools. I sincerely hope that some one sees sense and this project does not see the light of day.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1157	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. We said no in 2017 and asked for a meaningful consultation. The pushing through of this development has been done in an underhand manner which I am sure would not stand up under investigation. West Norwood is not for sale.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1158	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1160	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1161	Other	I am a resident of West Norwood and have been for 10 years and also a resident in Lambeth for 37 years. I want the proposals for Site18 and Site19 to be removed from this consultation please and new plans developed with the local community. We are a community and must have a say!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1162	Other	I demand the proposals for site 18 & site 19 are removed from this consultation & new plans developed with the lical community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1163	Other	I object strongly to the site 18& and 19 plans as proposed and demand they been removed from consideration pending a proper planning and consultation process. The community has not been properly consulted (this seems to be standard for Lambeth these days), the plan does not fit the location, it seems to go against your own planning guidelines, and it is not wanted. Please abandon these plans and focus on doing the	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			basics - housing, schools, social services, transport - that your residents need.	
Individual	R1164	Other	I would like to demand the removal of Site 18 and Site 19 from the west Norwood consultation. These developments will profoundly impact the retail and residential heart of West Norwood and Tulse Hill. There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact. West Norwood and Tulse Hill has a particular identity and visual character and any major development needs to be forward thinking yet also sympathetic to the local aesthetic and community requirements. These massive developments do not answer either of those briefs.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1165	Other	I am writing to strongly object to the plans for these sites and demand that they are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1166	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1167	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1168	Other	Please develop new plans for site 18 & 19 that include affordable housing and are in keeping with the local area, and listen to what local residents want and need in the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1169	Other	I am writing to demand the removal of Site 18 and Site 19 from the current Lambeth Council consultation. The local community has not been properly consulted on such significant changes to the community. This feels like another plan the council is trying to foist on the community without proper community consultation under the auspices of the pandemic. There has been little local notice about this development, which will have a massive impact on the broader community. I only found out about it two days before the consultation deadline. The council should have leafleted my street, particular since the monstrous alien mothership may be visible from by home. And it should have conducted several workshops to discuss possible designs and their impact. It is a massive development -- unlike the others in this consultation -- and will profoundly affect the West Norwood and Tulse Hill communities for years to come. The consultation process should reflect this by allowing for a longer process that facilitates local community input. The current approach that Lambeth council is taking ignores community consultation practices guidelines. The people of West Norwood and Tulse Hill are very involved with our local community and want to see improvements. However, it's critical that we	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>be involved in the process and not have them foisted on us. Therefore, I ask that you remove both sites from the current consultation and allow for several more consultations so we can further consider the impact of these developments on our community. This feels like another plan the council is trying to foist on the community without proper community consultation under the auspices of the pandemic. It feels rushed and underhanded, like the council is trying to sneak this through when many people are unable to attend events because they are ill or shielding and the pandemic has diverted attention elsewhere. There has been little local notice about this development, which will have a massive impact on the broader community. I only found out about it two days ago. The council should have leafletted my street, particular since the development will affect my local high street. It is a massive development -- unlike the others in this consultation -- and will profoundly affect the West Norwood and Tulse Hill communities for years to come. The consultation process should reflect this by allowing for a longer process that facilitates local community input. And it should have conducted several workshops to discuss possible designs and their impact--at a time when people are able to attend. In other words, not in the middle of a pandemic. The current approach that Lambeth council is taking ignores community consultation practices guidelines. The people of West Norwood and Tulse Hill are very involved with our local community and want to see improvements. However, it's critical that we be involved in the process and not have them foisted on us. The council should allow the community to further consider the impact of this development with additional information sessions and opportunities to ask questions and share feedback. While I would like to see this area used in a commercial fashion, I would want to make sure that adequate parking is allowed and current businesses like B&Q, which is an important community resource, are considered. I would also want to make sure that there will be little impact for the community businesses West Norwood is known for. These businesses have been resilient during the pandemic and add to the neighbourly character and feel of the community. Adequate consultation would make sure that we get high-quality/world-class architecture rather than the awful, cheap plans that developers throw up that blight local communities decades later. We need to take a different, more interactive and community-based approach with the site 18 development. I believe that incremental development, that's in proportion with the low-rise architecture already in the community, with an outline master plan and in close and extended consultation with the local community is the way forward. I strongly oppose the site 18 development plan as it currently stands, as</p>	

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			well as the poor consultation process regarding it. For the reasons stated above, Site 18 should also have a more extensive consultative process and should be removed from this SADPD consultation. Site 19 should also be removed from the SADPD and involve a more extensive consultation.	
Individual	R1171	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community involved. This is our high street, our community and we want a more harmonious development not high rise.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1173	Other	As a local resident who is incredibly proud of how West Norwood has created a burgeoning community that is not only cherishing and engaging with the existing community it has also become a desirable place for many families that have moved here as it hasn't been taken over by developers. The low level characteristics of West Norwood we want to cherish and high rise living is proven to not create the positive living being claimed. West Norwood is a great example of how old and new works symbiotically to create a new modern London. This is due to the amazing work of the Norwood action group protecting mindless development to the detriment of local residence. I don't want to prevent positive development and growth but nothing about the plans meet either. The fact that these plans have occurred without the usual consultancy is very distressing and against all the promises we are made by Lambeth council. These plans will single handedly kill our community and take away some of the cherished local shops that serve our community and replacing existing shops with corporate retail brands that are the ones that can only afford what we know will be increased rent. These are shops that have been developed to meet our local needs and carefully curated for all types of residents. More importantly it's displacing and destroying peoples existing housing to be replaced with undesirable high rise living. There is so much evidence to show that it shatters families lives being moved to high rise and makes no sense you're taking away decent housing away to create something worse. There is no consideration of this development meeting or working with the net zero target for 2030. Please please remove site 18 and site 19 from the plans or at least do us the decency of consulting with local groups before including so they can see the dire impact it will provide. Do this with humanity and decency. We've been through enough fighting against Southwark metals and the pandemic and just need to be involved to help grow our community and not see it destroyed.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1174	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community,	Please refer to the general response to representations made by individuals and businesses.
Individual	R1175	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1176	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1177	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1178	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1183	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1184	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1185	Other	I have looked at the current plans for these 2 sites. I am a local resident, address [redacted]. I am not against development in either site: Knolly's Yard has been an eyesore for years as well as the need for local homes; Norwood Road (West Norwood High Street) is probably good for some development, although not as needed as the Knolly's Yard. What I find problematic is the height of some of the buildings: 11 stories in the High Street and (I am informed) 22 stories for Knolly's Road. I am afraid that I find this too much for the area. Is it not possible to have further consultation with the local population? Please reconsider.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1186	Other	I am a resident of West Norwood and I request the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1187	Other	I am a resident of West Norwood (Lansdowne Hill) and my children go to school on Leigham Vale. I am strongly opposed to both sites 18 and 19 and I demand that the proposals are removed and new plans are developed with local community input. Development and housing are not bad per se, but forcing through plans without local approval of the people in the community is not appropriate. There are many reasons I oppose both sites, including, but not limited to, ruining the community	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			feel and aesthetic of West Norwood and the appalling traffic and parking problems that we already have, exacerbated by these proposals.	
Individual	R1188	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1190	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1191	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. The proposed developed is wholly unsuited to our local neighbourhood and we as a community demand more consultation before the plans are finalised.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1193	Other	I am a resident of West Norwood, and I'm writing to express my concern at the plans to build without proper consultation with the community. I feel strongly that you should remove the proposals for Site 18 and Site 19 from this consultation, and develop new plans with full consideration of the views of the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1196	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1198	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1200	Other	I am a resident of West Norwood in Bloom grove, very close to the proposed site 18/19 developments. I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. It is frankly shocking to see such plans made taking no consideration for aesthetics, impact on local business and community consultation.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1203	Other	I would like to demand the removal of Site 18 and Site 19 from this consultation. Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact. Additionally, no other Lambeth town centre is to be affected in the same way by these development plans which created inequity. This approach ignores the good practice community consultation that has previously happened. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes: It is vital that principles of collective action, collaboration and	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. These assets have not been properly used or consulted in this process. I am writing to object to the inclusion of these proposed sites in the Lambeth Sit Allocation Plans. The proposals are out of keeping with the architecture of the area and also the community development plans that are already in existence. The community needs to be an equal partner in the development of any future plans for the area. Any developments need to be ground breaking in terms of environmental and climate impact.	
Individual	R1159	Other	Please remove the plans for high rise buildings in Norwood Road as in my opinion they will not enhance Norwood and will cause unnecessary damage to the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1170	Other	I would like to email to object to the current consultation plans for site 18 in West Norwood. The consultation should be undertaken as a separate and stand alone process to ensure it is done fairly and with a view to finding the best outcome for local residents and local businesses. As a local business owner I would also like to raise the following questions: <ul style="list-style-type: none"> • How long will the project take to complete? • Will local businesses be compensated for the impact to our businesses during the build phase. • What other support will be given to local businesses? • How will disruption be kept to a minimum during the construction? • What will be the benefit to local businesses during and after the project completes? West Norwood high street was massively impacted by Thames Water in 2019 then the pandemic. This project is the last thing we need as we start our recovery.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1221	Other	I object to your current plans for these sites, they go against the Council's own plans for the area, they are not in keeping with their surroundings, they are significant taller than nearby properties (against stated Lambeth plans). They will also entail destruction of historically significant parade of shops.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Please go back to the drawing board and create much needed accommodation that sits well within the context of the local area.	
Individual	R1297	Other	I have looked at the proposals for site 18. I agree the area is in need of redevelopment. At the moment there is clearly a lack of detail, but I do have some concerns: The buildings are too tall: six storeys rising to a 12 storey (36m) would overwhelm the road, and indeed loom over the new green spaces being proposed. This is particularly the case when the architecture/design is likely to be no great shakes, given the fact they are going to be built for profit by developers with no other interest in the neighbourhood. I am also concerned about the businesses affected — there are some good shops in that part of the High Street — what's going to happen to them? However, I agree access from the York Hill estate could definitely be improved, and the opportunity to widen the pavement and plant more trees should be taken.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1314	Other	I would like to STRONGLY OBJECT to the plan for this vast development in West Norwood on the following grounds: 1. I've heard about this through the community not the council - there seems to have been no serious attempt to inform local residents and business and this plan appears to be being rushed through without proper scrutiny. There is no adequate public consultation. 2. This plans absolutely destroys the character of our local area, wiping out a whole section of our town centre with a huge impact on all local residents and business' and replacing it with a number of buildings which do not fit with the existing local landscape. 3. The proposal threatens people's businesses and homes. Many businesses' and livelihoods will be lost for good, many people will lose their jobs and our town centre will be destroyed forcing business outside of the area. 4. The tallest building towers over the existing local buildings and is not at all in keeping with the local lower rise neighbourhood. It also breaks Lambeth's own planning rules. 5. The buildings, particularly the tallest one, will impact daylight, sunlight and privacy for lots of local homes, thus wrecking residential amenity contrary to Lambeth and national planning policy. 6. Due to it's size, the building of this development will directly impact the noise levels for the local community for years...Hugely disrupting the lives of local residents. 7. This development will be years in the making, based on the last few years and the Thames Water works, the effect on the local community and business will be huge and footfall in remaining business' will be decreased thus threatening more livelihoods. 8. With the many proposed new homes comes an increase in cars,	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			there will be a huge impact on parking, traffic and air quality. The local roads are already overcrowded with daily altercations, problems parking and backed up traffic. There is also currently inadequate access to the site, further impacting the problems with local parking and traffic 9. There is no vision for a town centre that's fit for 2050 and beyond. 10. There is nothing in the plans about Lambeth's Net Zero Target	
Station to Station BID	R0535	Other	I am the manager of Station to Station business improvement district and I am writing this on behalf of the 500+ businesses in our BID area, some 300+ on the high streets alone. We have been given just 6 weeks to consult on two huge schemes, Site 18 & 19, which will have an enormous impact on the heart of our high street and the area as a whole. We as a community know that Lambeth needs to build more homes and that the West Norwood sites could potentially house hundreds of families. This could be a very good thing for the area's businesses. However, it could also potentially mean that developers buy up the shops and close existing businesses while they rebuild/renovate their premises with new flats on top. We have seen negative precedents locally for this with the development of Network Rail /Arch Co premises in both Herne Hill and Brixton, with extremely lengthy building works that result in the closure of much loved independent businesses and long term vacancies in the very core of these town centres.	Please note that the purpose of the SADPD is to set a vision for Site 18 which outlines the basic parameters that should guide any future development of the site. Such parameters include land uses and their quantum as well as indicative heights of buildings. The SADPD is not a development proposal for the site. Development proposals on any of the parcels within the site will be put forward by applicants in due course and follow the standard planning application process. The details of such development proposals will not be known to officers before applicants or developers put forward specific planning applications for the development of the parcels within the site allocation. Therefore, our capacity to respond to some of the points raised as part of your representation is limited at this stage.
Station to Station BID	R0535	Other	Below are some of the concerns that West Norwood & Tulse Hill businesses would like us as their business improvement district to raise on their collective behalves. • Consultation time – 6 weeks is not long enough for such a big development that will have such far reaching effects on the business community	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.
Station to Station BID	R0535	Other	• Size of high street frontage development – how could it happen, the entire street? block by block? or building by building? The area would obviously favour a 'piecemeal' approach as this would reduce disruption to the heart of the town centre	Following the recent consultation and in response to the representations received, the boundary of the site and the indicative massing of the buildings proposed have been revised. The revised site allocation for Site 18 is included in the SADPD Proposed Submission Version. The revised boundary excludes some of the retail and food premises previously included. As a result, only the section of the high street located between 300 and 346 Norwood Road would be affected. It is not expected the site will be developed at once. Instead, the most likely scenario is that where separate planning applications affecting each of the existing parcels within the site are submitted independently by separate applicants at different times. It is therefore expected that the site will be developed gradually allowing existing businesses to adapt.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Station to Station BID	R0535	Other	<ul style="list-style-type: none"> • Business rates relief / compensation – would business disruption payments be available to a) businesses directly affected by premises demolition/renovation and b) to the nearby business community for the impact of anchor shops closing, traffic, building works, noise, pollution (as was the case with Thames Water roadworks) 	The business rates relief / compensation matter is outside the remit of the SADPD. This is a planning policy document seeking to outline the basic parameters that should guide any future development of the site. As and when development proposals are put forward by applicants as part of planning applications the scale of specific development and, therefore, the disruption this may cause will be fully understood.
Station to Station BID	R0535	Other	<ul style="list-style-type: none"> • Compulsory purchase orders – will Lambeth use these to buy properties that landlords don't want to sell? 	As indicated in responses to previous points in your representation, the SADPD is not a development proposal. It is expected that separate planning applications affecting each of the existing parcels within the site are submitted independently by separate applicants/landowners/developers at different times. Detailed proposals will be assessed against the policies in Lambeth's Development Plan, which includes the London Plan, Lambeth's Local Plan and, once adopted, the SADPD.
Station to Station BID	R0535	Other	<ul style="list-style-type: none"> • Access – would the building work behind the high street effect traffic/parking on Norwood Road and side streets? What provision is being made for vehicles in the new housing developments? 	<p>With regard to disruption to commerce in the area during construction, as and when development proposals come forward, the need for any local mitigation measures would be considered through the planning application process. A Construction Management Plan will be secured through a condition linked to any planning consent granted to a major planning application within Site 18. A detailed description of vehicular access arrangements during the construction phase will be included in the Construction Management Plan. The plan will also manage the impacts of construction traffic.</p> <p>Where possible and appropriate, this process would also involve partnership working between the Council and the BID to maintain effective communication and help address specific issues that might arise.</p> <p>In line with London Plan policy T6 the development would be car-free and all units would be secured permit free, meaning residents on the site would not be entitled to parking permits to park on-street if a Controlled Parking Zone (CPZ) were introduced.</p>
Station to Station BID	R0535	Other	<ul style="list-style-type: none"> • Reduction of light industrial workspace – we are seeing across the capital encroachment of residential developers on key industrial space, there is a huge demand locally for 'messy, dirty, smelly' spaces (mechanics, artists, makers, joiners, industrial kitchens etc) and we would not like to see this removed from either site 18 & 19. 	<p>Following the changes to the site boundary introduced in the SADPD Proposed Submission Version, the quantum of existing floorspace in commercial and community use within the site amounts to 4,316 sqm GIA, of which 1,123 sqm GIA are identified as light industrial floorspace.</p> <p>The policy has been worded in order to achieve no net loss of existing industrial floorspace capacity. As a result, the SADPD PSV revised 'Land Use' section proposes between 3,000 and 4,000 sqm GIA of commercial/community space, of which at least 1,123 sqm GIA are to be re-provided as light industrial workspace.</p>
Station to Station BID	R0535	Other	<ul style="list-style-type: none"> • Directly affected retailers – would they have 'first refusal' on new units if their existing ones are demolished/renovated? 	Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
				applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected.
Station to Station BID	R0535	Other	• Timelines – how long could the disruption last? Would developers be held to account if works went over agreed schedules?	The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021.
Station to Station BID	R0535	Other	• Affordable rents – would independent businesses be priced out by multinational chains when the new units open?	Local Plan Policy D4 foresees the possibility of securing affordable retail floorspace through Section 106 planning obligations as a way to mitigate the impact that proposed development may have on the area. This will be negotiated along with other planning obligations at the time a planning application is put forward to develop the whole or part of the site identified in the SADPD. London Plan Policy E3 states consideration should be given at planning application stage to the need for affordable workspace where there is affordable space on-site currently, or has been at any time since 1 December 2017. In this context, planning obligations may be used at planning application stage to secure affordable workspace in those parts of Site 18 where affordable space exists or has existed in recent years.
Station to Station BID	R0535	Other	• Affordable housing – will the new residences on Site 18/19 be 'affordable' or market rate?	As the site is in a mix of private and public ownership, the affordable housing threshold will range from 35 per cent on privately owned land to 50 per cent on publicly owned land. The affordable housing threshold for each phase of development will be calculated pro rata according to the proportion of private and public sector land involved in that phase, following the approach in the GLA Practice Note 'Threshold Approach to Affordable Housing on Public Land' (July 2018) or any subsequent updated guidance. As per Lambeth Local Plan 2021 policy H2, 70 per cent of the new affordable housing provided on site should be low-cost rented homes (Social Rent or London Affordable Rent) and 30 per cent should be intermediate products (London Living Rent or Shared Ownership).
Station to Station BID	R0535	Other	• Environmental impact – how does the demolition of buildings fit with Lambeth policy on the Climate Emergency?	Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
				exemplary in meeting the zero carbon requirements of development plan policy.
Station to Station BID	R0535	Other	In the light of all these legitimate business concerns, we would ask that both site 18 & 19 be removed from the SAPDP to enable proper grass roots consultation. Development of these sites is necessary and would be beneficial to the area, but it needs to happen with the consent of those who will be most affected by it - the business and residential community.	Noted.
Individual	R0234	Other	I object to Site 18 & Site 19 and want the current proposals removed from this rushed and inadequate consultation. From my understanding, these proposals have been developed behind closed doors at Lambeth Council. The very proactive, engaged local community has not been invited to be involved, nor have the local businesses or community groups we are lucky to have in West Norwood & Tulse Hill. This is plainly wrong, especially as Lambeth's plans will cause major uncertainty, disruption and chaos for many years ahead. It will affect thousands of people living in the local area (inc their health due to increased traffic & pollution, both during & post construction), plus demolish at least 80 existing homes and 25 business premises, and cause local job losses. If Lambeth Council cared about people it would consult with the community openly & honestly, take onboard their opinions and what their new and future needs will be in a post-Covid world, and design a sustainable, inclusive and inspiring town centre fit for decades ahead. Instead, Lambeth gives us Site 18 (& Site 19) - ugly, visionless, high rise blocks, which I'm informed actually break Lambeth's own planning rules! Site 18 will destroy the character of West Norwood's town centre and skyline. The plans are not in keeping with the historic aspects of the local area and the high rise, high density blocks - including a 11 storey tower - will dwarf everything else. West Norwood is a residential area, not a central London urban zone. This is in addition to the monster sized development at Knolly's Road - who on earth could possibly think a 22 storey tower block is suitable for that location without proper consultation with the local community? I understand we need new homes but at what irreversible costs to the existing area, community and climate? How many of these properties on Site 18 will be council rents/affordable housing? Apparently, Site 19 isn't viable for affordable housing so will these be luxury private flats? It sounds like this is not about investment and regeneration to the benefit of many, but a case of Lambeth playing property developer (again) to the benefit of themselves.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Sites 18 & 19 are ill-concieved, short sighted and have clearly not been thought through with the gravity and detail the local community of West Norwood and Tulse Hill rightly deserve.</p> <p>For instance, where will the additional traffic go? Pollution and noise levels will rise - how will this affect the local population's health? There is no word on how local services will cope with the extra pressure. Will Lambeth be creating additional school/doctor/dentist places to meet the needs of the tower blocks residents? And how will the construction phases be managed - the local infrastructure couldn't cope with the pressures of the Thames Water upgrrrade which was 18 months long. How will it cope with mega construction over the course of five years or more? It has the potential to truly rip the heart out of the existing area & community.</p> <p>I urge Lambeth to do the right thing - remove Site 18 & Site 19 and work with the local community to develop new plans that are fit for purpose.</p>	
Individual	R0234	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0308	Other	Please think again about the development of the above. I have lived in West Norwood for a long time and feel it will ruin a place we all love. I cannot understand why Lambeth are even considering this move. Is there anyone on the planning committee that lives in Norwood? Please Please reconsider.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0452	Other	I am a resident of West Norwood and I would like to see the proposals for Site18 and Site19 removed from this consultation and new plans developed together with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0459	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1056	Other	<p>I am a member of the Lancaster Avenue Residents Association and I have recently been informed of the plan proposed by Lambeth Council to permit the building of two tower blocks; one in Norwood Road opposite the end of Lancaster Avenue and one in Knollys Road. Both of these will have an immediate adverse impact on Lancaster Avenue including volume and size of traffic. Both will have an adverse impact on the amenities in Norwood Road particularly during the building process and also after the building is complete. Lancaster Avenue will inevitably see an increase in traffic and a demand for parking which it does not have facilities for. West Norwood will suffer blight until the buildings are complete.</p> <p>I have no objection in principal to the development and improvement of sites within West Norwood for residential purposes but strongly object</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>to plans which would, if allowed, constitute over development with no real concern for the residents of West Norwood or for any infrastructure in the area.</p> <p>These proposals, if allowed, will be entirely out of keeping with the whole area of West Norwood and in particular Lancaster Avenue. As such they appear to be contrary to all previous policies of Lambeth Council including the designations of Conservation Areas and houses of Historic Interest.</p> <p>I fully support The Norwood Forum, Norwood Action Group and Norwood Planning Assembly in their objections to these proposals. My principal objections are:</p> <ul style="list-style-type: none"> · The over intensive use of the site producing exceptionally high levels of traffic, and · The locations of the sites and road access to them is not suitable, and • The inevitable significant increase in larger vehicles traveling to and from the site along roads that are unsuitable for such levels of, and types of, traffic resulting in negative environmental effects of congestion and pollution. The idling of lorries queuing to access the proposed sites from Lancaster Avenue and elsewhere will most certainly affect all residents and non-residents using facilities situated in Lancaster Avenue especially those attending the nursery and the school, and · Lancaster Avenue already suffers from excessive numbers of HGVs and other traffic causing noise, vibration and air pollution. LARA has made representations about this on a number of occasions and the problems are likely to get substantially worse as the introduction of the ULEZ, local LTNs and other road closure schemes come into effect. These new proposals from Lambeth Council would substantially increase the level of HGVs and other waste carrying vehicles using Lancaster Avenue and will increase all resulting problems. <p>I have some specific requests that should be implemented:</p> <ul style="list-style-type: none"> · Site 18 and Site 19 of the Development Plan must be struck out from it, and · Lambeth Council should abide by the five-year 2021 Lambeth Local Plan, and · Lambeth Council should abide by its previously published policy for tall buildings south of the South Circular, and • If these proposed plans or any variation of them should be contemplated they should be “plan led” and should be “part of a comprehensive scheme that integrates well with the locality” including, but without limitation, Lancaster Avenue. 	
Individual	R0589	Other	I am a resident of West Norwood and would like to register my objection to the plans.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>I am supportive of regeneration of the high street, but I am concerned that any development should retain the essentially low-rise Victorian character of the area. The large blocks proposed would be the wrong scale. An 11-storey block would dominate the skyline and not be in keeping. I also think that the relatively high density housing proposed on the site will cause a significant drain on the existing infrastructure, such as transport and schools.</p> <p>I am also concerned about the limited public awareness of the proposed site allocations and the very dated photographs used in the January 2022 evidence document. For example, This That and the Other closed in 2014 and the snooker club above Iceland closed in 2014 and was replaced by flats built by the council.</p> <p>I would like the current proposals for site 18 to be removed from the consultation and new plans developed with the local community.</p>	
Individual	R0907	Other	<p>I am writing to urge that the Council remove the proposals for Site 18 and Site 19 from the SADPD, and to instead formulate new plans by properly consulting and engaging with the residents of West Norwood. I only found out about the SADPD and proposals for Sites 18 and 19 a few days ago. Not from the Council by properly distributing information and alerting residents and informing them how to respond, but from neighbours circulating information. There has been insufficient genuine consultation given the very substantial nature of the proposed developments.</p> <p>Looking at the other 12 Sites, it seems that the two proposed for West Norwood are the only ones to substantially affect retail and residential aspects of a town centre. That surely merits enhanced, genuine consultation.</p> <p>The way the proposals for Site 18 and Site 19 have been communicated to the community for 'consultation' are completely out of keeping with the collaborative approach highlighted in the West Norwood's 2017 Masterplan.</p> <p>This is a neighbourhood ready to engage, so I see no reason why proper engagement should not be carried out. Residents want to work with the Council to plan for proper 21st Century development that enhances and respects West Norwood and its residents.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0907	Other	<p>There is room for development in West Norwood but I am strongly opposed to an 11 storey block of flats and any development which is not sympathetic to the heritage and architecture and community here. The location is not appropriate for a tall building and this proposal is contrary to Lambeth Local Plan 2020–2035, Policy Q26 Tall buildings.</p> <p>The plans for Site 18 are imposed (without collaboration with the local community) and drastic. Sure, there is land behind the High Street</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>between Landsdowne Road and Knights Hill that could be made much better use of, but the proposal is extremely drastic (right up to the main road) and will replace a substantial part of the current high street with a development completely out of character. A plan for 21st Century, incremental development formulated as a partnership between Council and residents would be much better. To be in-keeping with West Norwood this must be low-rise, not with buildings exceeding those already here.</p> <p>There are lots of seemingly minor things the Council could be doing to enhance West Norwood, such as improving infrastructure, mending the Landsdowne Road bridge, stopping fly tipping etc. Those things don't seem to improve and then we get a proposal for a high-rise development to be imposed on the community. This creates a sense that the Council don't care about the people of West Norwood and think they can do as they please with it.</p> <p>There is a strong identity and sense of community among residents of West Norwood. They are not against development. They are ready and willing to engage, and to develop plans in collaboration with the Council rather than having drastic developments imposed on them.</p> <p>I only heard about the development a few days ago from neighbours. I should have heard from the Council. The current consultation has not been adequate for such drastic proposed change to my neighbourhood. This is extremely disappointing.</p>	
Individual	R0907	Other	<p>I have been a resident of West Norwood for 13 months. I moved here from elsewhere in SE London because I like its low-rise, suburban nature, sense of community and strong identity.</p> <p>The proposal for Site 19 is drastically out of keeping with the suburban, low-rise nature of the neighbourhood. A really significant feature of the neighbourhood is its hilly topography with views in many directions from many vantage points. Sure, there are development and housing opportunities in West Norwood, but there is no justification for very tall towers that will greatly exceed the height of any current residential building for miles around. This will have a negative effect on the wider environment, in many parts of West Norwood.</p> <p>There is certainly room for development in West Norwood but I am entirely opposed to a 20+ storey building and any development that is not sympathetic to the heritage and architecture and community here. The location is not appropriate for a tall building and this proposal is contrary to Lambeth Local Plan 2020–2035, Policy Q26 Tall buildings. I suggest you reconsider and formulate new plans for low-rise housing by collaborating properly with the local community.</p> <p>I see nothing in the proposals to provide clear evidence that the Council</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>will develop infrastructure in West Norwood to cope with >400 new homes on this site.</p> <p>Knollys Yard seems to be an important business/light industry area - which seems unsuitable for turning into housing.</p> <p>West Norwood is not a particularly green neighbourhood in terms of open spaces for biodiversity. Alongside railway lines might seem like dead wasteland, but it is important habitat space that could be enhanced but will instead be threatened by the proposed development. Building between railways lines in this location will be extremely disruptive. And likely too expensive to build truly affordable housing.</p> <p>There are lots of seemingly minor things the Council could be doing to enhance West Norwood, such as improving infrastructure, mending the Landsdowne Road bridge, stopping fly tipping (often pretty bad along Knollys Road) etc. Those things don't seem to improve and then we get a proposal for a high-rise development to be imposed on the community. This creates a sense that the Council don't care about the people of West Norwood and think they can do as they please with it.</p> <p>There is a strong identity and sense of community among residents of West Norwood. They are not against development. They are ready and willing to engage, and to develop plans in collaboration with the Council rather than having drastic developments imposed on them.</p> <p>I only heard about the development a few days ago from neighbours. I should have heard from the Council. The current consultation has not been adequate for such drastic proposed change to my neighbourhood. This is extremely disappointing.</p>	
Individual	R0924	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0968	Other	<p>I do not agree with the proposals for sites 18 and 19. They will be a blight on the neighbourhoods with architecture and size completely inappropriate to the areas. The proposals for site 19 are particularly offensive and I could hardly believe what I was reading. Who but a lunatic would ever propose a domestic building of 22 storeys in 2022??</p> <p>I thought that it had been accepted that high rise housing developments were generally very unpopular with the general public some decades ago and since then many have been progressively been pulled down in favours of much less dense housing. Among other considerations I believe that this would just be building the slums of tomorrow. Nobody who had any kind of choice would actually WANT to live in them, particularly given Lambeth's policy of not requiring any parking spaces on developments which would lead to a chronic dearth of parking in the area. They would be occupied only by with the desperate dregs of</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			society who would have no say in where they are housed and thus could no be expected to have an pride in their surroundings leading to anti social behaviour and deterioration.	
Individual	R1058	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Norwood Action Group	R1156	Sustainability Appraisal	SUSTAINABILITY APPRAISAL 1. How will the affordable housing threshold be achieved? How will Lambeth ensure that financial viability of the development does not compromise the 35-50%?	The site allocation policy included in both the Draft SADPD and the SADPD Proposed Submission Version sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan. If the applicant cannot meet this threshold or fails to meet the other relevant criteria, the scheme will be viability tested to ensure that an applicant provides the maximum possible amount of affordable housing. The potential of this site to provide affordable housing will therefore be tested at the time planning applications are considered.
Norwood Action Group	R1156	Sustainability Appraisal	2. How does the 70% low cost social rent and 30% intermediate housing work with the financial viability of the project?	The requirement for 70 per cent of the affordable housing within a site to be low-cost rented homes (Social Rent or London Affordable Rent) and 30 per cent to be intermediate products (London Living Rent or Shared Ownership) is set by Lambeth's Local Plan Policy H2. These percentages apply to the total number of affordable homes proposed as part of a development, which is calculated used the Fast Track or the Viability Tested route as outlined in the response to the previous comment.
Norwood Action Group	R1156	Sustainability Appraisal	3. Flexible workspace for creative businesses and commercial space. How has demand for these spaces been calculated and how does the development ensure that these are still going to be viable workspaces in 50 years' time? How will local businesses or even any business in these sectors be able to afford the space whilst the development remains viable?	The West Norwood and Tulse Hill Business Space Demand Study commissioned by Lambeth Council and Station to Station BID in April 2022 and available on the Council's website sets out the demand for creative and flexible floorspace in West Norwood. London Plan policy E3 defines affordable workspace as a workspace that is provided at rents maintained below the market rate for a specific social, cultural, or economic development purpose. This includes i) sectors that have social value such as charities, voluntary and community organisations or social enterprises, ii) sectors with cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace, iii) disadvantaged groups starting up in any sector, iv) activities that support educational outcomes through connections to schools, colleges or higher education, or v) start-up and early-stage businesses or regeneration. Planning obligations defined at planning application stage along with Section 106 agreements will be used to secure any affordable workspace in

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
				any site or part of a site where it can be demonstrated that there is affordable workspace on-site currently, or has been at any time since 1 December 2017.
Norwood Action Group	R1156	Sustainability Appraisal	4. What structures will be in place to encourage training for local people within the creative and digital workspace?	Local Plan Policy ED15 requires financial and non-financial contributions for employment and training schemes to maximise local employment opportunities and help address skills deficits in the local population. This policy will also apply to the site.
Norwood Action Group	R1156	Sustainability Appraisal	5. Community floorspace – 'existing church will have opportunity to remain on site'. How has community floorspace been calculated given all the other space requirements on the site such as housing units? What is the opportunity being offered – space at a commercial rent as if offices?	In response to this and other representations received, the policy wording in the SADPD Proposed Submission Version has been amended to make clear any future development proposals will need to comply with the requirements set in Lambeth's Local Plan Policy S1, which safeguards existing social infrastructure. As per Policy S1 B, existing community premises will be safeguarded unless it can be demonstrated that i) there is no existing or future need or demand for such uses, ii) replacement facilities of equivalent or better functionality are proposed on or off site, or iii) the development of the premises for other uses, or with the inclusion of other uses, will enable the delivery of approved strategies for service improvements.
Norwood Action Group	R1156	Sustainability Appraisal	6. Development will be car free. How will this development ensure that disabled and physically challenged people do actually have 'improved accessibility'? Has the viability of the town centre existing businesses and new ones been assessed in a world without car parking, considering that which exists currently?	Any future application for the development of any part of the site will be subject to the London Plan and Lambeth's Local Plan policies relating to transport, in particular London Plan Policy T6 for maximum car parking standards, electric vehicle charging and Disabled Persons Parking requirements, and Local Plan Policy T6 on car club membership and permit free developments. It is therefore expected that Disabled Person Parking will be provided in line with London Plan Policy T6.1 G and H and T6.5.
Norwood Action Group	R1156	Sustainability Appraisal	7. Local Plan Policies apply. How does this fit in with the proposed breaking the threshold height limits as specified within the Local Plan?	As stated in Lambeth's Local Plan Policy Q26, any building over 25m in height located south of the South Circular Road is considered a tall building. This is the case for buildings located in West Norwood and Tulse Hill. For the middle and north parts of the borough only buildings above 45m in height would be considered tall buildings. The supporting text to this policy recognises the value of tall buildings to the extent they can make important contributions towards delivering new homes, economic growth and regeneration. Beyond those locations identified as appropriate for tall buildings in Annex 10 of the Local Plan 2021, Policy Q26 suggests that additional suitable locations might be identified during the preparation of the Site Allocations DPD. Site 18 has been identified as one of those suitable locations on the principle 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. Policy D3 of the London Plan encourages all development to make the best

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				<p>use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted.</p> <p>As recognised in Lambeth's Local Plan, although higher density does not necessarily imply higher rise, taller buildings are one form of higher density development that can be appropriate for some uses and in some locations, subject to excellent design, protection of strategic views, good public transport accessibility and consideration of the impact on the surrounding area.</p> <p>West Norwood is located between two train stations, West Norwood and Tulse Hill stations, and along a road heavily serviced by bus routes connecting the area to central London. As a result, West Norwood is rated PTAL 6a, the second highest accessibility score in London. This is seen as an opportunity to promote higher density development in line with Policy D3 of the London Plan.</p>
Norwood Action Group	R1156	Sustainability Appraisal	<p>8. 'Site specific design principles will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment'. This is a very poor quality threshold statement that basically says whatever is built will be at least better than the brownfield site it replaces. Lambeth have long viewed West Norwood and Tulse Hill as run down areas of low expectations. The design of even the most modern buildings reflects this attitude. 2 Thurlow Park Rd built in 2021 was designed by a very good architect yet is boring, monolithic and ugly. It could never have been built in a more affluent area. It typifies the current thinking within Lambeth planning. Nowhere has the council insisted on a standard of design that lifts the area, or raises the bar. When redesigning a brand new town centre we cannot settle for this low level standard of architecture. Einstein said that you cannot solve problems at the same level of thinking as that which created the problems. We cannot lift the area and have a town centre that is world class if we carry on doing the same old poor quality designs. Indeed it would be better if we keep and improve the existing in such circumstances.</p>	<p>The purpose of the Site Allocations Development Plan Document is to set a vision for Site 18 which outlines the basic parameters that should guide any future development of the site. Such parameters include land uses and their quantum as well as indicative heights of buildings. The SADPD is not a development proposal for the site. Development proposals on any of the parcels within the site will be put forward by applicants in due course and follow the standard planning application process.</p> <p>The design of any scheme that comes forward will be developed through the planning pre-application and application process. The detailed proposals and their design will be assessed against all adopted Development Plan policy and guidance, including Chapter 10 of the Local Plan, to ensure high quality design.</p> <p>Lambeth's Statement of Community Involvement outlines further opportunities for community involvement available along the planning application process. These opportunities include opportunities for community involvement led by the developer or applicant, who are encouraged to engage with the community and stakeholders before submitting any application. The planning application process also allows for members of the community and community groups to submit representations during the planning consultation period open for all planning applications, which normally lasts 21 days. Anyone can respond to a planning consultation regardless of whether they are specifically consulted or not. Any interested parties are encouraged to register with the Lambeth's Planning Applications Database in order to be notified about applications in their area or any part of the borough they are interested on.</p>

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Norwood Action Group	R1156	Sustainability Appraisal	9. 'The site is considered suitable for a tall building' How is this statement possible given it significantly exceeds the height threshold in the Local Plan? 'Design principles related to height are included in the policy'. Which policy does this statement refer to? How can Lambeth say that the proposal adheres to current policy when it blatantly flaunts the Local Plan? Where is the evidence for this assertion?	Please refer to the officer's response to your previous comment under point 7.
Norwood Action Group	R1156	Sustainability Appraisal	10. How are neighbour relationships being acknowledged when 80 families and other households are losing their homes along with over 30 local businesses, and the proposed block will overshadow every single building in the area?	<p>Following the Regulation 18 consultation, the draft site allocation boundary has been amended to exclude existing housing at the north and south of the site, as well as premises on 346-362 Norwood Road and 286-298 Norwood Road.</p> <p>Plans for the relocation of existing businesses on site, when required, will depend on the nature and timing of any development proposals that come forward as part of planning applications. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected. Any potential loss of existing housing will be dealt with in accordance with London Plan Policy H8 A that states the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. London Plan Policy H8 is supported by Local Plan Policy H3 'Safeguarding existing housing'.</p> <p>The approach to the massing within the site has been revisited following the consultation on the Draft Site Allocations Development Plan Document. The new massing is now reflected in the SADPD Proposed Submission Version.</p> <p>Daylight, sunlight and overshadowing assessments have been carried out by specialist consultants for all sites included in the SADPD Proposed Submission Version and form part of the revised evidence base. Regarding overshadowing, these assessments focus on the effect of building heights and massing on neighbouring amenity areas. For Site 18 the assessment concludes there will be little overshadowing of neighbouring amenity areas, with the exception of Thanet House's rear gardens, which would see their sunlight availability noticeably reduced.</p> <p>Within the parameters set in the SADPD, any future planning application for the redevelopment of this part of the site is likely to propose different massing and heights for the buildings within Site 18. A detailed assessment of each proposal once a planning application is submitted will be required. This will include a daylight, sunlight and overshadowing assessment.</p>
Norwood Action Group	R1156	Vision	VISION. Site 18 is the demolition and rebuild of a quarter of West Norwood Town Centre. In any other town centre in the UK, plans on this scale would	As stated in previous responses to this consultation, the SADPD is not a redevelopment proposal for the site. Development proposals on any of the parcels within the site will be put forward by applicants in due course and

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			involve a significant public engagement programme, working with the community, shops and businesses to ensure that we have a town centre that is future-proof, fit for the 21st century, and meets the ambitions and hopes of the people who live and work here. Over the years a number of studies and consultations have taken place about the future of this site. The outcomes of those conversations should be taken into account.	<p>follow the standard planning application process. Planning application proposals will be assessed against Lambeth's Development Plan policies, including the London Plan, Lambeth's Local Plan and, once adopted, the Site Allocations Development Plan Document.</p> <p>The vision set as part of the Draft SADPD consulted on as part of Regulation 18 and the revised SADPD Proposed Submission Version outlines the basic parameters that would guide any future development of any parcel within the site.</p> <p>The document West Norwood and Tulse Hill: A Manual for Delivery, published in 2017, built up on previous work carried out for the preparation of the 2007 Unitary Development Plan (UDP 2007) and the production of the 2009 Masterplan. It was thought as a framework to guide the way in which the area was to change in the future. This document provided an extensive and valuable insight on local community aspirations and priorities.</p> <p>Such community aspirations and priorities included the desire to support the growth of the town centre and local businesses, to provide new mixed tenure housing, to improve public realm, pedestrian and cyclist permeability and public transport accessibility. This intelligence has informed the content of the Draft SADPD consulted on and the revised SADPD Proposed Submission Version.</p> <p>The approach within the Manual for Delivery gave a very high-level, illustrative indication of the quantum of development that could potentially come forward at that time. However, it did not include a detailed delivery plan based on a comprehensive feasibility assessment, which would have been the next step. The SADPD provides a detailed feasibility and viability assessment within the parameters of Development Plan policy (London Plan and Lambeth's Local Plan) taking into account the current economic, social and environmental context, which has changed significantly since 2017. This assessment would have been required by any development proposals that might have come forward following the Manual for Delivery.</p>
Norwood Action Group	R1156	Vision	Since 2017 the Norwood Planning Assembly has been working on the Neighbourhood Plan to provide the ambitious mix of housing and retail that is required, driven in partnership with the community at it's heart.	Neighbourhood forums are encouraged to develop neighbourhood plans. The designation of the Norwood Planning Assembly Neighbourhood Forum was approved by the Cabinet of the Council in July 2017. However, these designations expire after five years, meaning that the designation of the Norwood Planning Assembly Neighbourhood Forum has expired before the forum has been able to produce a neighbourhood plan for the area.
Norwood Action Group	R1156	Vision	We welcome investment and development on this site, however we need a vision that is exciting, ambitious, rewarding and truly compelling. It has to go above and beyond simply being a profit driven venture for the council and developers. The vision has to set the highest aspirations to regenerate and renew West Norwood, allied with an	Please refer to our response to previous points made as part of this representation.

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			ethos of sustainability and the highest available environmental standards.	
Norwood Action Group	R1156	Vision	Norwood has ambitions to be a net zero town centre by 2030. This vision should outline how that would be achieved, and how this new development would be pivotal. It should be a vision for 2050 and beyond.	Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation. This is in addition to the existing, new and emerging requirements through the Building Regulations regime. All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on any parcels within the site allocation site, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.
Norwood Action Group	R1156	Vision	All over the UK town centre shopping precincts built in the 70's and 80's are being knocked down and re-built because they are no longer deemed fit for purpose. Big and small shop units once occupied by the chains are now empty and agents are struggling to find new tenants. We have to work together to avoid that here. That means having a powerful and clear 'WHY?' in the vision, and a fantastic and truly compelling narrative for any new scheme. We need data driven research to predict what the retail, business and leisure needs will be in 30 years' time and design accordingly. There is no point building for large floorspace retail if what is needed are small independent outlets. There are no vacancies on Norwood Road despite (and perhaps because of) the pandemic and prior to that 18 months of Thames Water disruption. As our town centre has never relied upon the national chains to survive and then prosper, why wipe this out to eventually replace with what? Green spaces and appropriate contextual scale are of huge importance. Building monolithic high storey blocks that dominate the skyline would be totally inappropriate.	The policy wording included in both versions of the SADPD, the Draft consulted on as part of Regulation 18 and the SADPD Proposed Submission Version, is not prescriptive in relation to the size of retail units to be provided on the site. The revised boundary for Site 18 included in the SADPD Proposed Submission Version excludes the majority of the existing retail and food premisses along Norwood Road previously included within the site. As a result, only premisses located between 300 and 346 Norwood Road are now located within the new boundary, including one large retail unit, a total of seven smaller retail units and five small units in use as restaurants or fast-food takeaway outlets. The SADPD Proposed Submission Version puts forward a total of between 3,000 and 4,000 sqm (GIA) of commercial/community floorspace for the whole of Site 18. Development proposals on any of the parcels within the site will be put forward by applicants in due course and follow the standard application process. These development proposals will provide details around the size of the retail units proposed and their use. Such proposals will be assessed against the Development Plan policies, including the London Plan, Lambeth's Local Plan and, once adopted, the Site Allocations Development Plan Document. In that sense the policy wording included in the SADPD Proposed Submission Version requires conditions to planning consents to ensure at least 50 per cent of units along the Norwood Road frontage are in shop use. Other town centre and community uses will help diversify and activate the high street, but these will not take up more than 50 percent of the Norwood Road frontage units. As set out in Lambeth's Statement of Community Involvement, further

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				opportunities for community involvement will be available along the planning application process. These opportunities include opportunities for community involvement led by the developer or applicant, who are encouraged to engage with the community and stakeholders before submitting any application. The planning application process also allows for members of the community and community groups to submit representations during the planning consultation period open for all planning applications, which normally lasts 21 days. Anyone can respond to a planning consultation regardless of whether they are specifically consulted or not. Any interested parties are encouraged to register with the Lambeth's Planning Applications Database in order to be notified about applications in their area or any part of the borough they are interested on.
Norwood Action Group	R1156	Vision	Describing a 12 storey block as 'discrete' is bizarre, given that is 60% higher than any existing building in the area and 4 - 6 times the prevailing building height in the town centre, which itself is higher than the suburban housing surrounding.	<p>The height and massing of the buildings proposed for Site 18 have been revised in response to the consultation on the Draft SADPD. The revision has taken into consideration representations made in the course of the consultation as well as newly available evidence.</p> <p>Giving the sloping character of the site, referring to heights above sea level (Above Ordnance Datum, or AOD) is considered the most appropriate approach. Existing properties along Norwood Road range between 47m AOD and 55m AOD in height, while buildings on the York Hill Estate side range between 68m AOD and 70m AOD in height. The height of buildings along York Hill (North) and Lansdowne Hill (South) range between 54m and 58m AOD.</p> <p>As per the SADPD Proposed Submission Version, the tallest of buildings indicatively proposed for Site 18 is now 75m AOD in height, five meters taller than the tallest of buildings on the York Hill Estate side and 28 meters taller than the shortest building along Norwood Road. The sloping character of the site means that, giving the location of this building at the centre of the site, the total height of the building above ground level will be 31 meters, six meters over the 25-meter threshold that defines buildings as 'tall buildings' for this part of the borough.</p> <p>The site on 6 Lansdowne Hill, also known as the Laundry, which was previously included within the Site 18 boundary, has been excluded in the SADPD Proposed Submission Version. The proposal for this site pursuant planning application 19/02840/FUL, which was granted permission on 13 March 2020, involves the demolition of the existing buildings and erection of a part six, part seven-storey building providing residential accommodation and a further four-storey office building. This proposal is now being erected, therefore, the proposed buildings are now considered part of the immediate built context adjoining the site.</p> <p>Using as a reference the height of residential floors in the building on 6 Lansdowne Hill currently under construction (3.150m for typical floors,</p>

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				3.400m for ground and top floors), a 31-meter-tall building would be a maximum of ten storeys high, therefore, three storeys taller than the tallest of buildings under construction on the Laundry site.
Norwood Action Group	R1156	Vision	The proposals vastly exceed the height thresholds for the area set out in the Lambeth Local Plan which was formally adopted on 22 Sept 2021 i.e. exactly 5 months ago. The Lambeth Local Plan sets out the vision, strategic objectives and policies for development in Lambeth for the period 2020-2035. It forms the statutory development plan for the borough. The policies of the Local Plan were drawn up in light of an extensive evidence base of research and studies and a multi stage public consultation and involvement process. The independent planning inspector found the Lambeth Local Plan to be 'sound and legally compliant'. As such, it is not for developers to pick and choose which parts of the Lambeth Plan they find acceptable. It is not for council officers or elected officials to pick and choose from the Local Plan. Lambeth cannot backtrack on its own Local Plan policies without reopening and revising the plan and once more extensively involving the local community – residents, businesses and all those others with interests in or interested in the town centre.	Please refer to our response to previous points raised as part of this representation.
Norwood Action Group	R1156	Vision	Calculations for the number of residential and business units need to be made taking into careful account the overall opportunities, requirements and constraints for the area. It seems like the presented numbers have been plucked from the air rather than being derived from an intimate awareness of the place and its people and businesses.	The indicative number of residential units and quantum of commercial and community floorspace put forward as part of the Draft SADPD and the subsequent SADPD Proposed Submission Version results from the optimisation of the site capacity. Optimising site capacity, as defined in London Plan Policy D3, means ensuring that development is of the most appropriate form and land use for the site. The same policy encourages all development, including site allocations, to make the best use of land by following a design-led approach that optimises the capacity of sites. The figures for residential units and quantum of commercial and community floorspace included in the Draft SADPD (390 to 470 self-contained residential units (gross) and between 5,000 sqm and 7,000 sqm GIA of commercial/community floorspace) and the revised figures stated in the subsequent SADPD PSV are given as ranges to reflect they are based on an indicative massing. The ultimate footprint and height of buildings, and therefore the ultimate number of residential units and commercial and community floorspace, will be proposed by applicants as part of planning applications. Once submitted, these applications will be assessed in full against Lambeth's Development Plan documents, which include the London Plan, Lambeth Local Plan and, once adopted, the Site Allocations Development Plan Document.
Norwood Action Group	R1156	Vision	A vibrant exciting town centre space where people can meet, work and contribute should be at the forefront of any design. It is therefore essential that a town square is large enough to be meaningful and form	Support for the provision of a new town centre public space for informal town centre activity is welcomed. The Draft SADPD consulted on as part of Regulation 18 identifies the

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			the heart of the design. However, it needs to be suitably located so that all those coming to West Norwood can enjoy, not hidden from the high street (as Waylett Place is currently) and seen as only for the occupiers of the surrounding buildings to the rear. Furthermore it should be bright and sunny rather than overshadowed by development. Such a space must also be deliverable. As proposed it's reliant on a number of individual sites coming forward for development and funding its delivery and subsequent management and maintenance does not seem clear nor fairly shared between all landowners. We are concerned that ultimately development will take place without the town square and at best that it's not completed till the mid 2030's. Have other options for a town square or a number of smaller spaces been explored, be they existing or new?	potential for a new town centre public space with active frontages that would provide not only an appropriate setting for new buildings but also an appropriate space for informal town centre activity. The vision map shows this public space indicatively located opposite the junction between Norwood Road and Chatsworth Way. The vision map included in the SADPD Proposed Submission Version continues to show this public space in roughly the same location. Based on the indicative massing for Site 18, daylight, sunlight and overshadowing assessments have been carried out by specialist consultants and form part of the evidence base submitted along the SADPD Proposed Submission Version. These assessments demonstrate the proposed main square in its indicative configuration will receive adequate sunlight. Within the parameters set in the SADPD PSV, any future planning application for the development of this part of the site is expected to put forward a proposal that includes a public space. A detailed assessment of such proposal once the planning application is submitted will be required.
Norwood Action Group	R1156	Vision	The architectural quality and detailing should do far more than simply 'enhance the overall appearance of the town centre'. This statement in the consultation vision clearly demonstrates a total lack of any real ambition in the outline. It is not hard to 'enhance' an area. As demonstrated by the Vision Foundation and new arrivals in the town centre, paint, pride and care can work wonders. The architecture should therefore thrill, enthrall and excite. West Norwood's new town centre should be a destination, one that respects the real pride and heritage of its history and people. It also should retain what is already good architecture and design and complement that elsewhere, notably our crescent opposite. We should not become an identikit town centre of anywhere or nowhere, nor lose our life and activity to vacant shops and other ground floor premises. Sadly there is not a single page in the whole outline proposal that would elicit the briefest flicker of excitement.	The purpose of the SADPD is to set a vision for Site 18 which outlines the basic parameters that should guide any future development of the site. Such parameters include land uses and their quantum as well as indicative heights of buildings. The SADPD is not a development proposal for the site. Detailed development proposals, including architectural design, on any of the parcels within the site will be put forward by applicants in due course and follow the standard planning application process. Planning application proposals will be assessed against Lambeth's Development Plan policies, including the London Plan, Lambeth's Local Plan and, once adopted, the Site Allocations Development Plan Document. As indicated in previous responses to this representation, Lambeth's Statement of Community Involvement outlines further opportunities for community involvement available along the planning application process. These opportunities include opportunities for community involvement led by the developer or applicant, who are encouraged to engage with the community and stakeholders before submitting any application. The planning application process also allows for members of the community and community groups to submit representations during the planning consultation period open for all planning applications, which normally lasts 21 days. Anyone can respond to a planning consultation regardless of whether they are specifically consulted or not. Any interested parties are encouraged to register with the Lambeth's Planning Applications Database in order to be notified about applications in their area or any part of the borough they are interested on.
Norwood Action Group	R1156	Vision	Lastly if redevelopment is to proceed it needs to be in a way that does not blight the town centre for years – the Council themselves say the	As stated in previous responses to this representation, the purpose of the SADPD is to set a vision for Site 18 which outlines the basic parameters

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			process will take 10 – 15 years. It could be longer given experience with other development in the area. Already we are seeing blight as landowners and developers and businesses delay investment in case there is something more profitable round the corner or because it's not worth it to be swept away very soon. This impact will spread beyond Site 18 to the whole town centre and beyond dwarfing the 18 months of disruption caused by the Thames Water mains replacement works.	that should guide any future development of the site. It cannot, however, be prescriptive in relation to the timescales in with such future development comes forward. Applicants are expected to put forward development proposals for each of the parcels within the site, which will then be subject to the standard planning application process.
Norwood Action Group	R1156	Site Allocation Policy	SITE ALLOCATION POLICY. 1. Where is the data to support the statements within 'Land uses'? How has this figure of 390-470 residential units been calculated given the height of the proposed blocks exceed Lambeth's own criteria in the Lambeth Local Plan 2021? Is this figure only attainable if the developer breaks the LLP criteria? Is this number achievable notwithstanding the documents set out other demands on space like the wide footways, the town square and other public and private realm, pedestrian and cycle route to and through the area, rear servicing? 2. 5000-7000 sqm of commercial/community floorspace. Where is the data to back this up? How have future retail needs and trends been assessed ensure that this amount is viable so we don't end up with many empty lots? Who will fund the delivery and subsequent use of the community floorspace?	As indicated in responses to previous points made as part of this representation, the indicative number of residential units and quantum of commercial and community floorspace proposed as part of the Draft SADPD and the subsequent SADPD Proposed Submission Version result from the optimisation of the site capacity. Optimising site capacity, as defined in London Plan Policy D3, means ensuring that development is of the most appropriate form and land use for the site. The same policy encourages all development, including site allocations, to make the best use of land by following a design-led approach that optimises the capacity of sites. The figures for residential units and quantum of commercial and community floorspace included in the Draft SADPD (390 to 470 self-contained residential units (gross) and between 5,000 sqm and 7,000 sqm GIA of commercial/community floorspace) and the revised figures stated in the subsequent SADPD PSV are given as ranges to reflect they are based on an indicative massing. The ultimate number of residential units and commercial and community floorspace will be proposed by applicants as part of planning applications. Once submitted, these applications will be assessed in full against Lambeth's Development Plan documents, which include the London Plan, Lambeth Local Plan and, once adopted, the Site Allocations Development Plan Document.
Norwood Action Group	R1156	Site Allocation Policy	3. Where has the figure of 50% of units in shop use come from? What is the criteria on which this assumption has been made? Does a shop unit include space for the existing or successor restaurants, cafes and similar already on the Site?	As indicated in policy ED7A of Lambeth's Local Plan, maintaining the predominant retail function of the primary shopping areas in major and district centres is seen as a way of supporting the vitality and viability of the Lambeth's hierarchy of major, district and local centres. Local Plan policy PN7 states shopping uses in West Norwood/Tulse Hill district centre will be safeguarded and encouraged, making sure that within the primary shopping area all ground floor units are in active frontage uses. A restriction of uses ensuring that at least 50 per cent of units are shops is also introduced by the same policy. This restriction in the context of the Site 18 allocation only affects the part of the revised site area that falls within the primary shopping area (i.e., ground floor units facing the high street between 300 and 346 Norwood Road). The remaining 50 per cent of units within the primary shopping area could

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				<p>be occupied by any use of those considered main town centre uses, including not only restaurants and cafes, but also all those other uses defined as main town centre uses in the London Plan, such as:</p> <ul style="list-style-type: none"> - leisure, entertainment and more intensive sport and recreation uses (including cinemas, bars and pubs, or health and fitness centres) - offices; and - arts, culture and tourism development (including theatres, museums or galleries). <p>These and other community uses are also compatible with the areas of the Site 18 allocation that fall outside the primary shopping area.</p>
Norwood Action Group	R1156	Site Allocation Policy	4. How has the existing commercial business in West Norwood space been taken into account to ensure that this development doesn't simply create dead areas in other parts of the town centre or indeed within the CBC adjacent?	<p>The Draft SADPD quantified 8,511 sqm GIA of existing floorspace on site whose use would fall under the category of commercial and community uses. The quantum of commercial and community uses floorspace proposed in the Draft version of the SADPD, which amounted to between 5,000 and 7,000 sqm GIA, sought to re-provide and rationalise most of the existing uses on site.</p> <p>Given the changes to the site boundary introduced in the SADPD Proposed Submission Version, the quantum of existing floorspace in commercial and community use that falls within the site has reduced from 8,511 sqm to 4,316 sqm GIA, of which 1,123 sqm GIA are identified as light industrial floorspace. The revised 'Land Use' section within the SADPD PSV proposes between 3,000 and 4,000 sqm GIA of commercial/community space now, to include at least 1,123 sqm GIA of light industrial workspace in order to achieve no net loss of existing industrial floorspace capacity.</p> <p>The SADPD does not propose any significant uplift in the quantum of main town centre uses within the site. Therefore, it is considered that the redevelopment of the site would not negatively affect the viability of other commercial businesses within West Norwood district centre or the neighbouring West Norwood Creative Business Cluster. On the contrary, the completion of between 150 and 170 residential units as proposed as part of the SADPD PSV is seen as an opportunity to increase footfall in the town centre and enhance the viability of existing and future businesses.</p>
Norwood Action Group	R1156	Site Allocation Policy	5. Affordable Housing. What criteria and calculations have been made to ensure that the development could actually deliver 35-50% threshold? Other new developments throughout London regularly downgrade this allocation percentage in order to make the scheme viable. What are the assumptions about the mix of such accommodation – the need is for family and other homes at affordable (to local people) rents? Even if the headline 35%/50% affordable housing is delivered will that be by units or size – more family homes to meet local need would mean in the latter case less affordable homes.	<p>The number and tenure of affordable housing units proposed as part of any future major planning applications (those proposing 10 or more residential units) within Site 18 will be assessed against London Plan policies H4, H5 and H6 and Lambeth Local Plan policies H2 and H4. The standard London Plan threshold approach as stated in Policy H5 will apply to those applications, i.e. the Fast Track Route for those that provide a threshold level of affordable housing and meet the other relevant criteria, or alternatively, the Viability Tested Route will apply for those applications that do not secure the mentioned thresholds.</p> <p>The application of the Fast Track Route would ensure that at least 35 per</p>

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				<p>cent of all residential units proposed as part of major planning application will be affordable residential units, including low-cost and intermediate products. Where development occurs on publicly owned land, this percentage will increase to 50 per cent of all residential units proposed within the parcel. In both cases and as per Lambeth's Local Plan Policy H2, of the total number of affordable residential units proposed, a minimum of 70 per cent would be low-cost units (including Social Rent, also known as "council", and London Affordable Rent products) while the remaining 30 per cent would be intermediate units (including London Shared Ownership and London Living Rent products).</p> <p>Lambeth's Local Plan Policy H4 will also be of application. This policy states the proportion of different unit sizes within the low-cost element (Social Rent and London Affordable Rent products) of any residential development, and states that a maximum 25 per cent of all low-cost units will be 1-bedroom units while a up to 30 per cent of those units will be 3-bedroom or larger units (also referred to as family-size units). The rest of units, between 25 and 60 per cent of units, will be 2-bedroom units. Viability assessments have been carried out by specialist consultants for each of the sites included in the Site Allocations DPD Draft and Proposed Submission versions. These assessments have taken into account the planning policy context in which development would occur, therefore, considering all the requirements set by the policies mentioned in previous paragraphs.</p>
Norwood Action Group	R1156	Site Allocation Policy	<p>6. Given costs how will Lambeth ensure that the affordable housing units are of equivalent quality to market units and crucially they are maintained as such? As the development is to be significant height and massing how will the needs of families with children be met and then delivered and maintained? Whilst planning policy is for tenure blind schemes, maintenance and management would fall to the housing association or council as landlord of the affordable rented. Will those in shared ownership flats be able to afford the high service charges? In short is the affordable accommodation viable in the first place and will continue to be so as a place for those in housing need to live and enjoy?</p>	<p>London Plan Policy D6 on Housing quality and standards states that all housing development should be of high-quality design and provide adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.</p> <p>Beyond the minimum internal spaces standards for new dwellings, Policy D6 goes on to state other qualitative design aspects to be addressed in all housing developments, from layout, orientation and form to outside space and usability and ongoing maintenance. A preference for dual aspect dwellings is also stated, although single aspect dwellings can be provided when it is considered a more appropriate design solution to meet the requirements of London Plan Policy D3, Optimising site capacity through the design-led approach, as long as it can be demonstrated that dwellings will have adequate passive ventilation, daylight and privacy, and avoid overheating.</p> <p>As per the same policy, the design of the development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, while avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. All</p>

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				<p>housing should also be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables and food waste as well as residual waste.</p> <p>Policy D7 of the London Plan also establishes the requirements for accessible housing in all developments, so these provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children.</p> <p>These policies are supported by policies in Lambeth's Local Plan and by London Plan Guidance (LPG) documents such as the LPG on Housing Design Standards published in June 2023. All these policies and guidance are of application to residential and mixed-use development schemes independently of their tenure and will be taken into account at the time any future planning application is assessed as part of the standard planning application process.</p> <p>As indicated in the response to the previous point in your representation, viability assessments carried out as part of the preparation work for the Site Allocations DPD Draft and Proposed Submission versions take into account the planning policy context in which development would occur, therefore, considering all the requirements set by these policies and guidance.</p>
Norwood Action Group	R1156	Site Allocation Policy	7. Social Infrastructure. What data has been used to assess capacity in current social infrastructure with regard to schools, doctors' surgeries, etc. How will shortfalls be made up? Borough CIL can't pay for everything especially given, for example, the affordable housing would be exempt.	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the evidence for the Local Plan 2021, and by the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> - necessary to make the development acceptable in planning terms; - directly related to the development; and - fairly and reasonably related in scale and kind to the development. <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.</p>

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Norwood Action Group	R1156	Site Allocation Policy	8. Heritage Assets. What criteria is being used to 'enhance the significance' of heritage assets? How will any design work with and complement existing buildings and spaces?	<p>Works that enhance heritage assets (and their settings) are those which improve upon their current circumstances. An enhancement to a setting might be the removal of a feature that currently detracts from its significance.</p> <p>Detailed design work will be a key matter for any planning application for the site. Any proposal that comes forward will have to meet the design policies in the Development Plan. These include Local Plan Policy Q5 (Local Distinctiveness), Q20 (Statutory Listed Buildings), Q21 (Registered Parks and Gardens), Q22 (Conservation Areas), etc. Q5 in particular seeks a 'positive response to local context'.</p>
Norwood Action Group	R1156	Site Allocation Policy	<p>9. Building heights. The consultation document states that part of the site is 'appropriate for a tall building height of 36m'. Given that the maximum height of any building in the south of the borough under the Lambeth Local Plan 2021 is 25m, how has this figure of 36m been arrived at? By its own admission the document states that this figure exceeds the threshold definition of tall buildings. How is it possible that a building of this size could make it into the scheme, given that it openly acknowledges it is contravening Lambeth's own rules? How has this height been determined? It will tower above all else in the tower centre. How has its location at the rear of the proposed shops been determined? Why is the vista from Chatsworth Way so important given it's a residential street and the focus should be the town centre?</p> <p>10. Other building heights. The indicative drawings clearly show that buildings of up to 21m would dwarf the existing buildings along Norwood Road, even if they are set back.</p>	<p>As stated in Lambeth's Local Plan 2021 Policy Q26, south of the South Circular Road any buildings over 25m in height are considered tall buildings. In contrast, in the middle and north of the borough only buildings above 45m in height would be considered tall buildings. The 25-metre figure is, therefore, only the threshold of what is considered a tall building in a specific part of the borough.</p> <p>As stated in the same policy, tall buildings can make important contributions towards delivering new homes, economic growth and regeneration. Beyond those locations identified as appropriate for tall buildings in Annex 10 of the Local Plan 2021, the same Policy Q26 suggests that additional suitable locations might be identified during the preparation of the Site Allocations DPD. Site 18 has been identified as one of those suitable locations on the principle 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.</p> <p>The height and massing of the buildings proposed for Site 18 have been revised in response to the Regulation 18 consultation. The revision has taken into consideration representations made in the course of the consultation as well as newly available evidence.</p> <p>The site on 6 Lansdowne Hill, also known as the Laundry, which was previously included within the Site 18 boundary, has now been excluded from the site. The proposal pursuant planning application 19/02840/FUL, which was granted permission on 13 March 2020 for the demolition of the existing buildings and erection of a part six, part seven-storey building providing residential accommodation and a further four-storey office building, is now being erected. These buildings are now considered part of the immediate built context adjoining the site.</p> <p>Giving the sloping character of the site, referring to heights above sea level (Above Ordnance Datum or AOD) is considered the most appropriate approach. Existing properties along Norwood Road range between 47m AOD and 55m AOD in height, while buildings on the York Hill Estate side range between 68m AOD and 70m AOD in height. The height of buildings</p>

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				<p>along York Hill (North) and Lansdowne Hill (South) range between 54m and 58m AOD.</p> <p>The tallest of buildings proposed for Site 18 is 75m AOD in height, five meters taller than the tallest of buildings on the York Hill Estate side and 28 meters taller than the shortest building along Norwood Road. The sloping character of the site means that, giving the location of this building at the centre of the site, the total height of the building above ground level will be 31 meters, six meters over the 25-meter threshold that defines buildings as tall buildings for this part of the borough.</p> <p>Using as a reference the height of residential floors in the building on 6 Lansdowne Hill currently under construction (3.150m for typical floors, 3.400m for ground and top floors), a 31-meter-tall building would be a maximum of ten storeys high, therefore, three storeys taller than the tallest of buildings under construction on the Laundry site.</p> <p>West Norwood District Centre develops along Norwood Road, whose frontage is lined with Victorian and 20th Century commercial premises. Along the high street contained between rail lines, the East side of the road presents a variety of building heights, ranging from ground plus two storeys (503 to 551 Norwood Road) to ground plus four storeys (457 to 461 Norwood Road). Similarly, the West side of Norwood Road presents variety of building heights, ranging from ground plus one storey (324 to 334, 354 to 362 and 376 to 384 Norwood Road, and 36 Knight's Hill) to ground plus three storeys (252 to 268, 280 to 282 and 286 to 292 Norwood Road, and 18 to 34 Knight's Hill).</p> <p>The revised wording in the SADPD Proposed Submission Version states that the height of the rest of buildings on the site should 'create a coherent roofscape rising from the perimeter street frontages to a single highest point within the site'. Building heights along the Norwood Road frontage are not expected to exceed the ground plus four storeys already present in sections of this road.</p>
Norwood Action Group	R1156	Site Allocation Policy	<p>11. 'No harm to views affecting heritage assets' It is extremely difficult from the indicative outlines to see how this could be achieved. It is easy to see from the Council's own material how it is not achieved.</p> <p>12. 'Respect context and create a balanced townscape with the Victorian frontage opposite'. The outline diagrams clearly show that 4-6 storey buildings of the size along the front would totally dominate and tower over the buildings opposite.</p>	Noted.
Norwood Action Group	R1156	Site Allocation Policy	<p>13. 'Active ground floor uses and key routes through the site'. How would this be achieved given the density of proposed buildings? Is there enough 'active' uses to fill the entire Norwood Road frontage and the routes beyond? Where is the evidence to show there won't be significant vacancy with inactive fronts to empty units? The experience</p>	As indicated in responses to previous points made as part of your representation, the SADPD, in both its Draft version and the Proposed Submission Version, does not propose any significant uplift in the quantum of main town centre uses within the site. Therefore, it is considered that the redevelopment of the site would not negatively affect the viability of other

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			of Ira Court comes to mind along with other recent developments in Tulse Hill and developers own viability assessments.	commercial businesses within West Norwood district centre or the neighbouring West Norwood Creative Business Cluster. On the contrary, the completion of between 150 and 170 residential units as proposed as part of the SADPD PSV is seen as an opportunity to increase footfall in the town centre and enhance the viability of existing and future businesses. The Draft SADPD quantified 8,511 sqm GIA of existing floorspace on site whose use would fall under the category of commercial and community uses. The quantum of commercial and community uses floorspace proposed in the Draft version of the SADPD, which amounted to between 5,000 and 7,000 sqm GIA, sought to re-provide and rationalise most of the existing uses on site. Following the changes to the site boundary introduced in the SADPD Proposed Submission Version, the quantum of existing floorspace in commercial and community use within the site amounts to 4,316 sqm GIA, of which 1,123 sqm GIA are identified as light industrial floorspace. The SADPD PSV revised 'Land Use' section proposes between 3,000 and 4,000 sqm GIA of commercial/community space, of which at least 1,123 sqm GIA are to be re-provided as light industrial workspace.
Norwood Action Group	R1156	Site Allocation Policy	14. 'Provide a varied roofscape'. How would this be achieved, especially if the financial viability only allows for one principal developer? How could the site be split up into plots so that different architects and developers could ensure variety of shape and form? Which developer would draw the short straw and have to accept low rise less bulky buildings? How would they be compensated or indeed enabled to proceed with development?	It is not expected the site will be developed at once. Instead, the most likely scenario is that where separate planning applications affecting each of the existing parcels within the site are submitted independently by separate applicants at different times. It is therefore expected that the site will be developed gradually allowing existing businesses and residents to adapt and a mix of architecture to come forward. The Site Allocations DPD sets the design principles and policies, which read along those in the London Plan and the Lambeth Local Plan, will guide the gradual development of the site.
Norwood Action Group	R1156	Site Allocation Policy	15. Transport, movement and public realm. There is no proposal for any residents or public parking. How does this fit in with providing ev charge points for new buildings? What measure are being suggested to minimise displacement parking into already congested neighbouring roads? Has the Council assessed the viability of the shops and other uses with no car parking at all?	Any future planning application will be accompanied by a full Transport Assessment which would include a parking assessment incorporating parking surveys and an analysis of the parking impacts of the development. If necessary, additional parking controls, such as the introduction of a CPZ, may be secured in mitigation for the development, to be funded by the developer.
Norwood Action Group	R1156	Site Allocation Policy	16. If this new public space is to 'provide a focal point for the town centre', how will placing it next to the largest buildings ensure there is enough light and rain to support a harmonious green public space?	Daylight, sunlight and overshadowing assessments have been carried out by specialist consultants for all sites included in the SADPD Proposed Submission Version and form part of the evidence base. The assessment for Site 18, which is based on indicative building shapes and heights, demonstrates the proposed main public space in its indicative configuration will receive adequate sunlight. Any future planning application for the redevelopment of this part of the site is expected to include a detailed proposal for a public space that will be

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				assessed against the policy requirements set in the SADPD once adopted, as well as those included in the London Plan and Lambeth's Local Plan.
Norwood Action Group	R1156	Site Allocation Policy	17. Neighbour relationships. How will tall buildings of 6-12 storeys not impact upon the existing buildings adjacent to the site given they will be looking directly at each other, and will absolutely overshadow them? This includes the Council flats on the York Hill estate, the flats above the shops on the opposite side of Norwood Road and the side streets.	The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Norwood Action Group	R1156	Site Allocation Policy	18. Energy and sustainability. The consultation says that 'every effort should be made to maximise contribution towards achieving net zero emissions'. Given Norwood's ambition to be net zero by 2030 and Lambeth's own borough-wide targets, this should be a commitment rather than wishful thinking. There is a lot of green- washing here. A development for the 21st century of this overdevelopment and size should be laying down clear non-negotiables when it comes to energy, sustainability and climate change issues. Why are these not built into the scheme as primary objectives? Why is this massive housing lead project not being designed to be 100% energy efficient when the technology and expertise exists to do so? This section of the consultation lays bare the shocking lack of future ambition for the project.	Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.
Norwood Action Group	R1156	Site Allocation Policy	19. Air Quality. The consultation simply says that air quality be 'addressed'. This is weak. It should be a primary objective of any such scheme to have a non-negotiable commitment to reducing potential pollution, whether that be through heating and lighting systems or vehicle use.	The exact wording in the Draft SADPD and the subsequent SADPD Proposed Submission Version states that 'Air quality should be addressed in accordance with London Plan Policy SI1 and Lambeth's Air Quality Action Plan.' Links to the relevant policy and documents are included in the SADPD PSV.
Norwood Action Group	R1156	Site Allocation Policy	20. Access to urban space – development should address existing open space deficiency. How is this going to be achieved given the density of building that is being proposed? It is more likely that this development will exacerbate open and play space deficiency in the area.	As indicated in the Draft SADPD and the subsequent SADPD Proposed Submission Version, future development should address existing open space deficiency by meeting the requirements of Local Plan Policy EN1(d). This policy will be applicable when assessing any future planning applications for the site.
Norwood Action Group	R1156	Vision Map	VISION MAP. The map demonstrates that the 81m AOD building in the middle will clearly tower above even the highest local buildings of the York Hill	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an

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			estate which sit in an elevated position on York Hill. As such this diagram show how inappropriate a tower of this height would be. The proposed 81m AOD high tower would stand less than 40 metres way from the existing buildings/shops opposite on Norwood Road that are only 55m AOD high. The new tower would dwarf these businesses and the homes above and block out daylight and sunlight in the afternoons and evenings. Similarly in the mornings those living to the west would lose out.	adverse effect on local character. Please see the revised evidence document for further information. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. As indicated in response to some of the previous points raised as part of this representation, the 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Norwood Action Group	R1156	Context	<p>CONTEXT.</p> <p>Land Ownership. How many different landowners currently own the various site plots? Would the necessary CPOs make the site viable? Could compulsory purchase powers be justified and achieved to take away over 30 viable existing businesses and 80 families' and others' homes?</p> <p>Existing land uses. How many of the tenants/shops/church and businesses have been consulted? How many of the current council tenants would be allocated new homes within any new development? How would the development ensure that businesses would not be lost for good in the area given the inevitable years of building works? What would happen to these residents and businesses whilst building work is underway? A particular issue if there is one comprehensive development.</p>	<p>Issues regarding land ownership and CPOs fall out of the remit of the SADPD, which seeks to provide a policy framework should the site come forward for redevelopment. Whilst the indicative approach indicates what a comprehensive development might look like, there is flexibility in the policy itself for the retention of some blocks.</p> <p>Following the consultation, the draft site allocation boundary has been amended to exclude existing housing at the north and south of the site, as well as 346-362 Norwood Road and 286-298 Norwood Road. Please note that inclusion in the Draft SADPD boundary does not compel the site to come forward and the policy has been amended in the SADPD PSV to make this clear.</p> <p>Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected. Any potential loss of existing</p>

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				housing will be dealt with in accordance with London Plan Policy H8 and Local Plan Policy H3.
Norwood Action Group	R1156	Context	<p>Local Plan Place and Neighbourhood Policy. This section leads to the recently adopted Local Plan.</p> <p>PN7A states that 'Development in the area will need to be of a scale and form related and appropriate to its context'. How does breaking the threshold for building heights in this proposal fit in with the Local Plan? Or indeed with what already existing in West Norwood? PN7B All ground floor units should be in active frontage and no fewer than 50% of ground floor units are to be in shop use. What data and evidence is used to support these requirements?</p>	<p>As stated in Lambeth's Local Plan Policy Q26, any building over 25m in height located south of the South Circular Road is considered a tall building. This is the case for buildings located in West Norwood and Tulse Hill. For the middle and north parts of the borough only buildings above 45m in height would be considered tall buildings. The supporting text to this policy recognises the value of tall buildings to the extent they can make important contributions towards delivering new homes, economic growth and regeneration.</p> <p>Beyond those locations identified as appropriate for tall buildings in Annex 10 of the Local Plan 2021, Policy Q26 suggests that additional suitable locations might be identified during the preparation of the Site Allocations DPD. Site 18 has been identified as one of those suitable locations on the principle 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.</p> <p>As indicated in policy ED7A of Lambeth's Local Plan, maintaining the predominant retail function of the primary shopping areas in major and district centres is seen as a way of supporting the vitality and viability of the Lambeth's hierarchy of major, district and local centres. Local Plan policy PN7 states shopping uses in West Norwood/Tulse Hill district centre will be safeguarded and encouraged, making sure that within the primary shopping area all ground floor units are in active frontage uses. A restriction of uses ensuring that at least 50 per cent of units are shops is also introduced by the same policy. This restriction in the context of the Site 18 allocation only affects the part of the revised site area that falls within the primary shopping area (i.e., ground floor units facing the high street between 300 and 346 Norwood Road).</p> <p>The remaining 50 per cent of units within the primary shopping area could be occupied by any use of those considered main town centre uses, including not only restaurants and cafes, but also all those other uses defined as main town centre uses in the London Plan, such as:</p> <ul style="list-style-type: none"> - leisure, entertainment and more intensive sport and recreation uses (including cinemas, bars and pubs, or health and fitness centres); - offices; and - arts, culture and tourism development (including theatres, museums or galleries). <p>These and other community uses are also compatible with the areas of the Site 18 allocation that fall outside the primary shopping area.</p> <p>The Lambeth Local Plan was adopted in 2021 and was informed by a large evidence base, as well as an Examination in Public. The evidence base</p>

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				can be found: https://www.lambeth.gov.uk/planning-building-control/planning-policy-guidance/lambeth-local-plan-2021/evidence-base .
Norwood Action Group	R1156	Context	PN7E increase green infrastructure, improve access to open space and improve air quality. What specifics are going to be applied to this Site 18 proposal. How will you improve air quality and by how much with regard to WHO guidelines? How will you increase green structure given the site size and the number of housing units that are being proposed? The two are incompatible. Tower blocks are notoriously environmentally unfriendly and historically contribute more greenhouse gases in their construction. To what standards will any new development hold eg Passive Haus?	The Draft SADPD policy makes reference to Lambeth's Local Plan Policy EN1 D, which requires new development to address existing open space deficiency. The indicative location for a new public open space is shown on the vision map. In line with London Plan policy T6 the development would be car free and all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street if a Controlled Parking Zone (CPZ) were introduced. The number of vehicular trips generated by development on site would therefore be limited, helping to minimise impacts on parking, congestion and air quality. London Plan Policy S1 would also apply to the site, which states that development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Local Plan Policy PN4 D will apply to the site, which encourages the use of Passivhaus standards.
Norwood Action Group	R1156	Context	Neighbourhood Development Plan. The Norwood Planning Assembly (NPA) has been working on a specific Neighbourhood Plan proposal for this site. Why has this new proposal not referenced all the work already carried out and taken heed of the community discussions that have been taking place over the last 15 years?	The designation of the Norwood Planning Assembly Neighbourhood Forum has expired and a draft Neighbourhood Plan has not been consulted on at either Regulation 14 or Regulation 21 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The council's policy on giving advice and assistance to local groups at the different stages of the neighbourhood planning process are set out in the Statement of Community Involvement.
Norwood Action Group	R1156	Context	Views. The context document states there are no strategic views. The proposed massing and heights will mean that this development will totally dominate the views from all around and be visible from all around.	No strategic views extend to West Norwood. Visibility 'from all around' (whether designated or otherwise) should not be equated with harm. The Council's assessment does not consider the effect of the indicative approach on townscape and views to result in harmful outcomes.
Norwood Action Group	R1156	Context	Access to open space and nature conservation. The proposal accepts that there is a deficiency of open space. However the proposed massing means that any open space on the new development will be limited including any new public square. Furthermore it will introduce at least 1000 extra people to an area of identified deficiency.	The Draft SADPD and its revised SADPD PSV policy make reference to Lambeth's Local Plan Policy EN1 D, which requires new development to address existing open space deficiency.
Norwood Action Group	R1156	Context	Neighbour Context: The proposed 11-12 storey block will be less than 40m away from 3-4 storey residential units on Norwood Rd. The maisonettes opposite on York Hill are 3 storeys and the York Hill estate a maximum of 5 storeys. The housing on Lansdowne Hill is predominantly 2 storeys. The proposed block is between 50-66% higher than any of the existing buildings. This clearly demonstrates how inappropriate the new proposal is.	Noted.
Norwood Action Group	R1156	Evidence	EVIDENCE DOCUMENT Section 1.3 The SADPD assumes that the site will be comprehensively	Following the consultation, the draft site allocation boundary has been amended to exclude existing housing at the north and south of the site, as

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			developed. This assumes that the existing Victorian shop fronts and buildings behind would have to go along with the 80 families and other households and the 30 or so businesses.	well as premises on 346-362 Norwood Road and 286-298 Norwood Road. The new boundary is now included in the SADPD Proposed Submission Version.
Norwood Action Group	R1156	Evidence	Section 1.4 Refers to the Local Plan in how it approached massing. It doesn't explain why or how the LLP has been breached with regard to building heights.	Please refer to responses to previous points made as part of this representation in relation to the definition of tall buildings south of the South Circular Road.
Norwood Action Group	R1156	Evidence	Section 3.1. Key principles. With each of these principles there is an unresolved tension between the bulk and overdevelopment of the buildings with the objectives of creating wider pavements, improved permeability, safe spaces and through routes.	Please refer to responses to previous points made as part of this representation in relation to the requirement to optimise site capacity outlined in London Plan Policy D3 and the requirement for new development to address existing open space deficiency as set out in Lambeth's Local Plan Policy EN1 D.
Norwood Action Group	R1156		Section 4.1 and 4.2. The commercial space indicates clearly that on the ground floor we could expect 4 massive blocks and a very small public space. This is not the size and stature of a town square as all the other previous consultations have alluded to. This is simply a small space with a few trees that might house one of two benches. It is not the open focal point and meeting space that is required for a town centre.	<p>The main purpose of the Evidence documents is to explain the design-led process that led to the proposed indicative massing put forward for each of the sites included in the Draft SADPD. The analysis of the existing and compatible uses, when applied to the resulting indicative massing, informs the approximate land use quantum put forward in the policy text for each of the sites.</p> <p>As indicated in Part 1 of the Evidence document for Site 18, the design-led approach includes an assessment of the site and its context that summarises the history of the site, its character, building heights and uses present on and around the site, heritage assets and designated views relevant to the site, access and servicing routes, and an assessment of the public realm and the relevant planning context. Based on this assessment, a list of key design principles was outlined and, as a result of applying those design principles, two indicative massing and height options were put forward.</p> <p>The purpose of the Site Allocations Development Plan Document is to set a vision for Site 18 which outlines the basic parameters that should guide any future development of the site. Such parameters include land uses and their quantum as well as indicative heights of buildings. The SADPD is not a development proposal for the site. Development proposals on any of the parcels within the site will be put forward by applicants in due course and follow the standard planning application process. Planning application proposals will be assessed against Lambeth's Development Plan policies, including the London Plan, Lambeth's Local Plan and the Site Allocations Development Plan Document once adopted.</p>
Norwood Action Group	R1156	Evidence	Figures 14 and 17. How is it possible to have a 12 storey block that towers above everything be described as 'discretely located' and 'respects the high street overdevelopment'? This building would be 66% higher than the existing buildings along Norwood Road and would be visible from practically every angle. This is how it would 'help wayfinding'.	Noted.

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			Section 5.1 The document states that the development should not be 'unduly dominant in its context'. It is hard to reconcile this given the overdevelopment of the buildings in relation to the existing building lines. A development on this overdevelopment for a town centre would totally dominate the townscape.	
Norwood Action Group	R1156	Evidence	<p>Section 5.3. The height and massing. Policy Q26 of the Lambeth Local Plan makes it clear that the threshold for tall buildings in this area is 25m. The proposal contains indicative proposals for 36m, an increase of 50% above the maximum. It is therefore inexplicable that the SADPD has accepted this height as a possibility.</p> <p>Section 6.1. The document states that the centre of the site can accommodate a degree of height c36m despite acknowledging elsewhere that this height is way above the threshold for acceptable building heights in the part of the borough (LLP 2021). How could this conclusion have been reached?</p>	<p>As indicated in previous responses, Policy Q26 of Lambeth's Local Plan Policy Q26 states that any building over 25m in height located south of the South Circular Road is considered a tall building. This is the case for buildings located in West Norwood and Tulse Hill. For the middle and north parts of the borough only buildings above 45m in height would be considered tall buildings. The supporting text to this policy recognises the value of tall buildings to the extent they can make important contributions towards delivering new homes, economic growth and regeneration. Beyond those locations identified as appropriate for tall buildings in Annex 10 of the Local Plan 2021, Policy Q26 suggests that additional suitable locations might be identified during the preparation of the Site Allocations DPD. Site 18 has been identified as one of those suitable locations on the principle 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.</p> <p>Following the consultation of the Draft SAPDPD, the massing and height of the buildings indicatively proposed for Site 18 have been amended. The general height the revised SADPD Proposed Submission Version proposes for the tall building located at the centre of Site 18 is 75m AOD, approximately 31 m above ground level in that location given the sloping nature of the site. As per Local Plan Policy Q26, a building 31 meters in height (between 9 and 10 storeys) continues to fall under the definition of tall building for this part of the borough.</p>
Norwood Action Group	R1156	Evidence	The indicative images do not take into account the proposed development at Knollys Yard. Both have a bearing on the impact on the town centre and wider residential area of West Norwood.	The Knolly's Yard scheme is n longer being progressed as a Site Allocation site.
Norwood Action Group	R1156	Other	<p>Please see the attached response submission for Site 18 from Norwood Action Group (NAG) along with a copy of the submission from Knollys Yard Community. NAG fully endorses the Knollys Road objection to the proposals.</p> <p>For the avoidance of any doubt, NAG demands the proposals for Site18 and Site19 are removed from this consultation and new plans developed in partnership with the local community.</p>	Noted.
Norwood Action Group	R1156	Other	<p>Norwood Action Group opposes the outline plans for Sites 18 and 19 in their current form. It believes it is essential that Lambeth remove these two sites from the SADPD.</p> <p>We welcome investment and regeneration into West Norwood, and</p>	The Council as Local Planning Authority has a duty to enable and support sustainable development through the planning process, as set out in national planning policy. Paragraph 11 of the National Planning Policy Framework (NPPF) sets out that the development plan 'should promote a

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>believe that this is best achieved through true partnership working with the local community to ensure that we have a town centre fit for purpose for the next 100 years.</p> <p>The SADPD plan is a poor and incongruent plan produced behind Lambeth's closed doors, trying to increase housing numbers the easiest way, namely by high-rise and high density tower blocks long discredited for family occupation. The plan takes no account of existing businesses, existing tenants, and the 21st Century needs of a net zero town centre. The plan directly contravenes the Lambeth Local Plan 2021 despite the ink being barely dry on the LLP which was approved by cabinet in September 2021. The LLP makes it very clear that tower blocks over 25m high are inappropriate for this suburban part of the borough. Lambeth therefore cannot pursue the tower blocks specified in the SADPD without discarding key elements of the democratically approved LLP. Furthermore, the Council should consider the cumulative impacts of two major developments so close together which share the same road accesses, buses and trains, local services and facilities and also view corridors</p> <p>With regard to Site 18, we are surprised and hugely disappointed that no reference has been made to previous plans for this site, namely:</p> <ul style="list-style-type: none"> • West Norwood Town Centre Master Plan 2009 • A Plan for West Norwood and Tulse Hill: Community Evidence Base Report • West Norwood and Tulse Hill: A Manual for Delivery 2017 • Norwood Design Support NPA 2019 <p>In summary....</p> <ul style="list-style-type: none"> • We do not want top-down decisions steamrollered through • We do want genuine consultation in developing a carefully considered plan • We do want investment and regeneration in West Norwood • We do want more homes for families • We do want thriving local businesses • We do want a retained and ever more vibrant local community <p>CONCLUSION</p> <p>We ask the Council to now formally withdraw Sites 18 & 19 from the SADPD, and new plans be developed with the local community of residents and businesses, for the following reasons</p> <ul style="list-style-type: none"> • There was no advance notification or involvement of community groups or the public. • No notification or explanation of the apparent withdrawal of the 2009 Master Plan and the West Norwood and Tulse Hill: a Manual for Delivery 2017. 	<p>sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects'. The Council has brought forward draft site allocation policies for a number of sites known to have development potential in the borough, to set out the parameters for achieving sustainable development, to ensure key strategic and local place-making objectives are delivered and to make sure important public benefits are secured. The Council can, in some circumstances, make use of its own assets to help deliver its objectives for sustainable and inclusive growth, either by bringing forward development directly or by working in partnership with others. With regards to private land on the site, landowners and developers are entitled to bring forward proposals for development on their land, so long as this is done in a way consistent with the policies in the development plan for the area. The Council's role, as Local Planning Authority, is to bring forward appropriate development plan policies (including through the SADPD), and to assess planning applications against these policies. Private sector landowners and developers have an important role to play in helping to deliver regeneration and sustainable growth in Lambeth through appropriate and sustainable development of their assets.</p> <p>Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. This includes the timeframe of the consultation. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version. The council organised three targeted stakeholder engagement workshops with representatives of the community stakeholder groups that had submitted responses to the Regulation 18 consultation on draft sites 18 and 19 in West Norwood/Tulse Hill. These were held over a six-week period in October and November 2022. These workshops provided an opportunity for Council officers and members to explore further the points raised in the Regulation 18 representations with local representatives. These workshops have helped inform the Council's consideration of the Regulation 18 consultation responses received and the resulting content of the Proposed Submission Version SADPD for Site 18.</p> <p>The scale of change proposed at Site 18 is not considered to be different to the other draft site allocations in the document. All 14 of the sites allocated in the Draft SADPD are considered to have significant regeneration</p>

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<ul style="list-style-type: none"> • Cabinet approval was on 13 December but it took until 6 January 2022 to notify Norwood community groups and offer an online briefing. This was held on the earliest possible date offered by the Council of 24 January. The West Norwood and Tulse Hill community has therefore been given less than four weeks to activate the community and respond following this briefing. The statutory consultation period of six weeks is therefore not being complied with. • Insufficient time and resources allowed to adequately engage the community in understanding the proposals and their long term impact. • The Council has not even informed those residents and businesses whose buildings would be demolished. Our neighbours and local shops face years of anxiety but no help is being offered by the Council. • Very limited consultation methods only used; no attempt to reach hard to reach groups. • The drafted proposals do not actively promote the Council's policy to address climate change. • There is no evidence of the long-term impacts of the pandemic being considered and incorporated. • The plans come across as a desktop exercise not tailored to local circumstances. • Unlike the other 12 sites, sites 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • The tall buildings would be the highest in the borough south of the South Circular. • The overwhelming evidence from feedback received (from door knocking with leaflets and also handing them out along Norwood Road on Saturday) is that the local community is against the plans for such massive over-development and destruction of our existing town centre and our 15 Minute Neighbourhood. 	<p>potential and have been guided by the design-led approach set out in London Plan Policies D1B(3) and D3, which seeks to ensure that the development capacity on the sites is optimised. This approach takes into account the unique context and characteristics of each site. The opportunity for extensive redevelopment on Site 18 has been signalled in planning policy since the adoption of the Unitary Development Plan in 2007. This has been carried forward through to the Local Plan 2021, where the site is allocated for mixed use development. Local Plan Policy PN7 F(i) further echoes that 'In order to incentivise land assembly and comprehensive redevelopment opportunities the density of new development should be optimised' on Site 18. Policy in the London Plan and Local Plan have been subject to multiple rounds of consultation and a public examination. The Draft SADPD must therefore follow an approach consistent with adopted development plan policy and the approach to consultation consistent with national regulations and the Statement of Community Involvement. The Manual for Delivery, and other Lambeth consultations in West Norwood, have provided an extensive and valuable insight on local community aspirations and priorities, such as a desire to support the growth of the town centre and local businesses, to provide new mixed tenure housing, to improve public realm, pedestrian and cyclist permeability and public transport accessibility. This intelligence has informed the content of the Draft SADPD for Site 18. Where relevant, the findings of the Manual for Delivery were also reflected in the Local Plan as supporting evidence. The approach within the Manual for Delivery 2017 for site 18 gave a very high-level, illustrative indication of the quantum of development that could potentially come forward at that time. It did not include a detailed delivery plan based on a comprehensive feasibility assessment, which would have been the next step. The feasibility and viability of any development proposals that came forward following the Manual for Delivery would always have required further detailed assessment within the parameters of development plan policy. Since 2017, economic, social and environmental circumstances have changed significantly. This means that the objectives for Site 18 need to be revisited and the current context for delivery of viable development needs to be taken into account. The Manual for Delivery is not a planning policy document (as is clearly stated in that document). Please note that inclusion in the red line boundary does not compel the site to come forward. Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>opportunities for any business likely to be directly affected.</p> <p>Policy Q26 in the adopted Local Plan 2021 makes clear that additional locations appropriate for tall buildings may be identified in site allocation policies. Please see in particular the last sentence of paragraph 10.128, which states 'The council is also preparing a Site Allocations DPD which may identify sites suitable for tall building development'. Part B of the policy also addresses applications for tall buildings outside of the locations identified in Annex 10 or as identified in site allocations.</p> <p>Lambeth Council declared a Climate Emergency in January 2019.</p> <p>Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance is being brought forward by the Mayor of London. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.</p>
Norwood Action Group	R1156	General	The Norwood Action Group opposes the outline plans for Site's 18 and 19 in their current form, and believe it is essential that Lambeth take these two sites out of the SADPD. Please refer to our detailed submission via email.	Noted.
Individual	R1227	Other	I am a resident of West Norwood and demand for the proposals for site 18 and 19 to be halted. Any design should be done with strong community consultation and developed on the best interests of the West Norwood population. This does not currently adhere to this.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1858	Vision	Where are the added amenities and transport for increasing population	Please refer to the general response to representations made by individuals and businesses.
Individual	R1859	Vision	Build it as soon as possible please - I'm a local resident and this proposal would be a fantastic addition to the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1860	Vision Map	I think it is great, Ealing and Acton are good examples as bringing more business to the high streets after new development. I hope west Norwood would follow.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1861	Site Allocation Policy	You can not blend in high riser housing and improve the architectural setting of Norwood road. It would look totally out of place and with have a negative outlook.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1862	Vision	Far too bulky and high for the area, destroying the existing Victorian town centre rather than complementing the existing buildings. More like	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			60s architecture, learnt nothing from its over development and de humanisation	
Individual	R1863	Site Allocation Policy	It is right in the beating heart of West Norwood. The edifice proposed will loom over the community. Totally unsuitable from every angle.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0008	Vision	Officers' did a presentation on a very similar scheme to this via a local meeting a couple of years back and the feedback does not seem to have been taken on board. Very disappointed. Further to having left comments on your Common Site re this proposal. There was a consultation meeting locally a couple of years ago and I am disappointed that many of the views from this have not been taken into account. You seem to have been working over the last few years behind locked closed doors. This site is south of the South Circular yet you have disregarded the Lambeth Local Plan. I would very strongly suggest you have more than a basic web presentation for this major and overbearing development is a suburban area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0009	Vision	I am excited to hear about the project! My wish is that the architectural aesthetic will be a priority as well as wider pavement, to ensure the space will be appealing and enjoyable, together with lots of greenery and space for nice shops and restaurants/cafes. The selection of shops and restaurants is key to ensure the project will elevate the area and will maintain its vibrant independent vibe as much as possible. Even if chains will be interested, I hope in Gail's over Starbucks :)	Please refer to the general response to representations made by individuals and businesses.
Individual	R0009	Site Allocation Policy	I am looking forward to seeing a more vibrant Norwood Road, fostering creative businesses to move in this area and modern contemporary shops and cafes to rise, but the height proposed for the buildings is UNACCEPTABLE. The works should be to improve the area and enhance heritage and beautiful view of London. The building should not be taller than the the tallest one already present in the same site and rather expand horizontally.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0009	Vision Map	I like the fact that there will be a sort of 'square' where you can browse sips and cafes without being in front of the high road	Please refer to the general response to representations made by individuals and businesses.
Individual	R0009	Vision	Very happy with the proposal overall, but the height of the main building should be significantly reduced	Please refer to the general response to representations made by individuals and businesses.
Individual	R0009	Other	I am writing you as I am horrified by the proposed site plans for both Knollys road and West Norwood, respectively site 18 and 19. Could I please ask for the rationale behind allowing such tall buildings, in areas such as these?	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>I would truly understand how this has even been considered and if you are seriously considering to review the maximum height of the building to limit it to 4 stories.</p> <p>I look forward to hearing back from you and would kindly ask you to be informed about any live consultation.</p> <p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>The height of the buildings will ruin our view forever and the traffic will be even more unsustainable than it is right now.</p> <p>We want the sites to become a spot for green areas and nice shops to keep the community alive and make west Norwood an even more pleasant place to visit, work and live.</p> <p>We truly hope you will listen to the people who are living there.</p>	
Individual	R0011	Vision	<p>I am a resident of SE27 and will strongly oppose any development with high-rise blocks here. This is a low-rise area lacking green space - that is what we need. The roads and amenities are certainly not able to cope with the hundreds of extra homes being proposed. There are so many reasons why this is a poorly conceived proposal. It will have a hugely detrimental effect on light and space in West Norwood,</p> <p>I urge Lambeth to stick to the 2021 Lambeth Local Plan. West Norwood must remain part of the 'south of South Circular policy'.</p> <p>And please ditch this dog's dinner of a proposal for Site 18 - and Site 19 too, which is even worse.</p> <p>Where is the "new town centre public space"? You seem to herald it in the blurb but it's either simply a bit of PR to get this plan over the line or it's so minimal it's insignificant. Remove the four high-rise blocks proposed in the centre of the site, turn that into a centre square with green space and I would consider supporting this. Otherwise not. But please Lambeth, stop trying to cram developments in to line developers' pockets. This is where we live.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0013	Other	<p>I object to this plan because it contravenes the 2021 5 year Lambeth Local Plan in that it is not "part of a comprehensive scheme that integrates well with the community". It is part of a shopping street that currently serves the community well. This is a low-rise area.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0016	Vision Map	<p>I object to this development as it is too dense as the buildings are too high</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0016	Vision	<p>Sadly although your vision sounds good the height of the buildings you are proposing will destroy this vision. Towering high rise flats will create an unpleasant space beneath them. High architectural quality need not mean high buildings that go much higher than the Local Lambeth Plan</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			of 2021. I object to your vision on the grounds that it is unrealistic if you put in high rise flats - they are not appropriate to our area.	
Individual	R0016	Site Allocation Policy	These plans are not consistent with the Local Lambeth Plan so I object to them on this basis - the flats you are proposing are too high.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0016	Other	<p>With reference to your public consultation on the proposed local Development Plan of Site 18 Brooks Laundry Site and Site 19 Knollys Yard which closes on 22 February I totally object to all your proposals for these two sites.</p> <p>This proposal makes a mockery of what is in the 2021 Lambeth Local Plan. This plan is what we should be referring to for permitted development in our area in order to keep the character of our locality in West Norwood and Tulse Hill. Site 18 and 19 should therefore be removed from this Development Plan. What is the point of asking local people to formulate the 2021 Lambeth Local Plan to then completely ignore it and use a new Development Plan which has not consulted local people or any councilors either. How can this be even logical? It is an insult to local people who have spent time and considerable thought on how we should proceed with local development. I am pro development but using the more conservative and considered approach of the 2021 Lambeth Local Plan.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0028	Other	<p>I write as a very concerned citizen who is, frankly , amazed and furious about the proposed development of a new town centre for West Norwood. Firstly I am concerned about the increased traffic that the build will bring. Any proposal to build 400-500 homes will create huge disruption, noise, pollution, traffic to the surrounding area. I live on York Hill which already has more traffic than it can handle (buses, huge lorries, as well as it being treated as a through road by very fast drivers). Knollys road is equally small and will be equally overrun by construction traffic. Our neighbours wall was crashed last Dec by an errant bus driver due to traffic-maybe next time a child will be on that pavement? The noise alone is enough to cause huge mental health issues for a vast number of current residents. A build over several years will be an absolute disaster for a huge amount of residents. There is no mention of parking. Where are these 500 home owners supposed to park? I have problems enough parking outside my own front door and the surrounding roads (eg Broxholme road) is already a one lane of traffic through fare only due to the parking issues. Presumably you believe the roads around can absorb the extra 500 cars-they cannot! The traffic on Norwood high street is already jammed. The one way route makes it vastly more so. The new steelworks in Windsor grove which Lambeth SHAMEFULLY went ahead with -DESPITE huge uproar</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			from locals will make it EVEN WORSE. How do Lambeth council believe this is for the best for residents? The local infrastructure cannot withhold this. It is already impossible to get a GP appt. the trains will be overrun as services have been cut. How about schools? Dentists? There simply are not enough. As for Thames Water-we have works going on within 500m from our house on and off for 3 years, continually digging up areas that they just worked on and cutting off access again and again, how on earth can these old pipes supply 500 more homes? I am simply LIVID that this proposal is even going ahead and wish to register my disgust loudly and clearly.	
Individual	R0041	Vision	<p>I am a resident of Tulse Hill/West Norwood and have lived on Norwood Road for almost 20 years.</p> <p>In response to the consultation on the 2 areas for development above [Sites 18 and 19], I don't think that either proposed developments are in keeping with the existing buildings. The proposed 12 and 22 storey buildings are considerably higher than existing buildings and there are no architectural drawings available of what they look like. Other new buildings in the area such as the one on Thurlow Park Road are distinctly uninspiring. We do not want our high street turned into a string of ugly high rise flats. Following new changes to road usage, the traffic on Norwood Road has increased substantially - these 2 new developments will continue to contribute to traffic and levels of air pollution.</p> <p>Proposed buildings are too high and there is not enough consideration for existing traffic congestion on Norwood Road and traffic pollution.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0042	Evidence	<p>I do not see the justification for removal of buildings and shops along Norwood Road. The photos used in this document are out of date and do not show that many shops have been renovated over the past few years, and are now in much better condition than the photographs suggest. The flats built above Iceland, for example, are of recent construction, not overly intrusive on the streetscape and good quality construction. I see no rationale for a new development like that being removed. The other shop facades are of varying quality, and many could benefit from renovation, but several have been improved over recent years (e.g. WearAbouts, Vision Foundation, Knowles of Norwood) - and these improvements show how the high street could be revived using the existing, diverse, building styles, and keep the character of the current mixed, low-rise style. I have no objections to low-rise flats being built on the derelict site behind, provided they are below or at worst, the same height as the existing York Hill flats and that efforts are made to protect those residents access to daylight, but I see no reason to force the diversity and character of Norwood Road into a</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			new 'one size fits all' development that will have no resemblance to the current variety of building styles. The high street may not have architectural significance in itself, but the existing buildings show how the face of the street has grown organically over 100 or so years, and that resulting variety in building styles is part of the charm. To replace that entire stretch of road with buildings of the same size, style and age would rip all the character out of West Norwood.	
Individual	R0042	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>I have commented on the Commonplace site for this proposed development but I would like to add some further comments on email. I am a local resident of West Norwood since 2008 and I feel strongly that this development is not on a scale that would be manageable in a residential, suburban community like West Norwood.</p> <p>Whilst I am in favour of the derelict site behind Norwood Road being developed, and could see this being a suitable site for low-rise housing, I see no justification for a large development on the scale that is being proposed, including the removal of a large stretch of existing buildings on Norwood Road.</p> <p>I understand that the original footprint of this plan was based on a historic proposal for Tesco to build a large superstore on the site. This never happened, and I do not understand why the current plan wants to tear down a street of thriving businesses. It is clear that developments on the scale of the original Tesco plan are not viable any more, so I see no justification for removing existing buildings that are not derelict or in disrepair.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0042	Other	<p>Your 'Evidence' document states that the architectural quality of buildings on the street is 'low to average', but the photos used are years out of date, some of them even pre-dating 2008 when I moved to the area. This is not at all a fair reflection of the area, which has seen many of those buildings renovated and in much better condition than they were before.</p> <p>There are many newly opened businesses, and long-established ones, who are rebuilding their trade after the pandemic and years of Thames Water roadworks before that - what recompense would be offered to them for even worse disruption or even closure of their business? Smaller premises may also suffer from the loss of 'anchor' businesses such as the petrol station or B&Q; will they be offered business rates relief? Will existing businesses be offered preferential rates to reopen in the new premises, and will there be protection to avoid too much reliance on chain stores in the new units?</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0042	Other	<p>I would also stress that, although the buildings on this stretch of road may not be particularly innovative or striking, and some certainly could do with some renovation, their diversity of style and building materials is part of the charm of West Norwood. The stretch between Subway and Efes restaurant is a very attractive terrace, with a ghost sign - these buildings have a unique character which I believe is worth preserving. In addition, the more recent development above Iceland is a very pleasant low-rise development which does not intrude on the streetscape - with the penthouse level set back from the street. I cannot believe that a smart recent development like this might be demolished after only a few years to be replaced with something much more intrusive and dominating.</p> <p>When you compare how well this development has fitted in and not worn badly, in comparison to the extremely poor quality Ira Court which looks shabbier than ever, it reinforces the need for developments with high quality materials, designed to be in keeping with their surroundings, not imposed on them.</p> <p>Another recent development I would commend for its good quality construction and attractive aspect is the housing on the Unigate site at Valley Road (SW16 2XR). This kind of low-rise housing I feel would be ideal for the derelict part of the site - following precedent of other nearby developments like Lansdowne Wood Close (SE27 0BY). At the very least, any flats built should not exceed the height of the existing York Hill flats, and ensure those residents are not deprived of light. There is no precedent in the area for flats above 4-5 stories, and as I understand it, the policy for Lambeth until now has been to keep new developments above this height inside the South Circular. There is no justification given for why this guidance should be broken now.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0042	Other	<p>The local area, being mainly residential housing of Victorian or 1920's-30's era, with some low-rise blocks, does not have the amenities to cope with the influx of such a large and dense set of flats. The local schools will not have the capacity, public transport locally is already on its knees since the pandemic, roads and pavements are in a poor state and roads blighted by speeding and congestion. This is not an area which needs or wants this level of extra disruption and pressure on resources.</p> <p>Finally, I would reiterate again that there is no precedent that I can see for replacing an entire stretch of high street with a development on this scale. Many high streets have varied and diverse blocks and terraces of different eras and sizes, and even if the quality is not all equally good, the variety is part of the charm and is a good thing. A high street with an endless block of identical flats, in place of all the current diversity, will</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			look dull and unengaging, and a poor setting for the view towards St Luke's church.	
Individual	R0042	Other	<p>West Norwood has a very strong community spirit - I have volunteered for years at Feast, and helped on community garden projects, my children went to preschool and to playgroups in many locations around the area.</p> <p>This is a place people choose to stay in - I've moved within the postcode in the 14 years I've lived here, and I know many others who have - and to see the heart ripped out of a community which has grown and thrived, and endured the pandemic, would be a tragedy.</p> <p>The time given for the community to respond to this is barely adequate, the Commonplace process is opaque and confusing, and our local councillors given no prior warning either. This is not a fair or honest way to treat local residents and I hope this proposal will be treated with the contempt it deserves.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0054	Vision	<p>The proposal for such tall buildings in this area is totally out of keeping with the surroundings.</p> <p>I am concerned about the quality of the planned accommodation in terms of unit size, green credentials, and the apparent lack of gardens, green space and parking. What is meant by 'affordable'. Any accommodation should be ideally be social housing that is genuinely affordable.</p> <p>The frontage of the current high road is historic and elegant and I would [no more text]</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0054	Vision Map	The proposed buildings are too tall and out of keeping with the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0054	Other	<p>As a long time resident of West Norwood I am contacting you to request that sites 18 & 19 (proposed developments in Lambeth) be removed from the current programme of community consultation for the following reasons:</p> <ul style="list-style-type: none"> • Unlike the other 12 sites, sites 18 & 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill- one of the 5 town centres recognised by Lambeth. • No other Lambeth Town Centre is to be affected in the same way by these development plans, so the consultation process should be different to reflect this. • These are the only 2 sites with recommendations for tall buildings • There has been insufficient time to adequately engage the community in understanding the proposal and the long -term impacts. • This current approach ignores all the good practice community consultation that has previously taken place and the recognised capacity of the local community organisations to deliver that level of 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>consultation. As the 2017 'Masterplan Moving Forward: A Collaborative Approach to Delivery' describes:</p> <ul style="list-style-type: none"> • "It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, which have also stated their desire and commitment to being part of future delivery." • There is an established community volunteer led Neighbourhood Planning Assembly who are writing a Neighbourhood Plan. This forum should be used to develop genuinely collaborative and community driven proposals for these two sites. 	
Individual	R0055	Vision Map	<p>81M building heights are totally out of keeping with the local area. Any development should be in proportion to the maximum height of the buildings on the opposite side (east) of west norwood high street. I have no confidence in the quality of architecture that will be approved based on the approval recently of some appalling architecture of recent flat developments on the south circular at tulse hill</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0055	Other	<p>I wish to register an objection to the height of the buildings proposed in the Norwood Road Site 18 plans.</p> <p>The proposed heights of the buildings are excessive and do not compliment the local area. They should not exceed the height of the Victorian terrace on the east side of norwood high street. In particular the central tower negatively impacts a number of views and there appears no justification for this. It would be preferable to remove this tower and the overall density by replacing it with a larger open space for the future residents.</p> <p>Additionally I raise concerns on the historical benchmark for architectural design and materials. None of the buildings over 4 stories approved in recent years on norwood road and thurlow park road have enhanced the area and have rapidly looked shabby and dated and will not last the test of time I have little confidence based on past approvals that the Lambeth planning committee have the skills to judge architectural quality and can approve designs that are innovative, complementary and make us proud of West Norwood. We should be aiming at something exceptional, not just functional and low cost.</p> <p>As a resident of West Norwood I request that site 18 & 19 are removed from the draft plans for the following reasons</p> <ul style="list-style-type: none"> • A 1 hour briefing is insufficient for the size of the plan and much broader consultation is required 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • These are the only two sites with recommendations for tall buildings. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact • This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes: It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. 	
Individual	R0056	Site Allocation Policy	A well planned and exciting project	Please refer to the general response to representations made by individuals and businesses.
Individual	R0056	Vision	Great plan, would really benefit the area	Please refer to the general response to representations made by individuals and businesses.
Individual	R0056	Vision	I think this looks pretty good. The site is currently a mouldering ruin and any development is a good thing	Please refer to the general response to representations made by individuals and businesses.
Individual	R0056	Other	I think this looks great myself, hope it goes ahead!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0059	Vision	This development is not in keeping with the rest of West Norwood, it will be one of the tallest buildings in the area and will certainly overshadow all neighbouring residences.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0059	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p> <p>I am concerned about the proposed developments at Site 18 and 19 in West Norwood. I live in West Norwood, and the proposed developments would alter the neighborhood in profound ways. These two buildings would be the tallest in all of West Norwood. As they are such tall buildings, they will significantly increase the numbers of people in the</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			neighborhood, which already has issues with significant traffic on the high street. The need for housing is important but this cannot be done all in one go just by adding the tallest building possible in the area. If the buildings were more in line with what is already present, there would not be such an uproar from the residents who already live here. As such I oppose the proposed plans for Sites 18 and 19.	
Individual	R0060	Evidence	I can't believe this evidence refers to significant views when I have seen a mock up of how this tower block is going to look from Chatsworth road and it is hideous! Totally incongruous with the local architecture, towers over all the Victorian buildings, against what Lambeth have previously stated they would do in terms of keeping with local topography. Just a joke!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0060	Vision	This looks absolutely horrendous and is not in keeping with the area's historical features nor the wishes of local residents. Lambeth has the highest council tax of most London boroughs and we don't pay this elevated sum to have our local high street destroyed. The last thing London as a city needs is more high rise buildings, and this especially goes for our high street, where there is nothing over 10 stories. The only taller buildings are those that have been converted, and therefore are in keeping with original architecture. Please don't ruin our area!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0060	Vision	This looks awful. This is not in keeping with the history or architecture of the area, and I strongly object to this as a long standing resident of West Norwood. Tall buildings are the last thing we need in what is essentially a residential area of Victorian housing. We do not need another Elephant and Castle or Croydon town centre!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0060	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. As a resident of Lambeth I strongly object to this proposal for the reasons outlined below <ul style="list-style-type: none"> • Unlike the other 12 sites, Site 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth. • No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this. • These are the only two sites with recommendations for tall buildings. • There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact • This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			the 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery, describes: It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery. As a resident I would like to have my say and request another site visit open to the public , and an open consultation meeting.	
Individual	R0064	Vision	It's good that it mentions architectural quality and detailing, but what is really needed is a statement explaining that buildings should look beautiful from the outside.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0064	Other	I am writing in support of the proposals for the centre of West Norwood. I have lived in West Norwood for 15 years. London is in urgent need of new housing, and this development is to be welcomed. I love B&Q and the Texaco garage, but I've never heard anyone say that the centre of West Norwood is beautiful. This development, if properly considered, could make West Norwood a much nicer place to live. An eleven storey development is very appropriate for an inner London Borough.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0065	Vision Map	Scrap any idea of a Grenfell Tower in West Norwood. Who wants a "new public space? We already have more than enough problems with street drinkers?	Please refer to the general response to representations made by individuals and businesses.
Individual	R0065	Evidence	The "evidence" is that the "Grenfell Tower" changes the whole profile of the area. I assume that it is only included to be truncated when the protests are too great, leaving residents to sigh with relief when the rest of this unwelcome and intrusive redevelopment goes through	Please refer to the general response to representations made by individuals and businesses.
Individual	R0065	Sustainability Appraisal	The addition of a new "public space", alias gang meeting place, in a location which already suffers from sporadic youth violence (stabblings and shootings) is most unwelcome.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0065	Context	The Flood Risk does not mention the storm drains though the site and across the Norwood Road which prevented completion of the planned new water main along the Norwood Road	Please refer to the general response to representations made by individuals and businesses.
Individual	R0065	Site Allocation Policy	The site allocation policy as stated above should not be compromised by the erection of a Grenfell Tower behind the buildings facing the Norwood Road.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0065	Site Allocation Policy	The site already has over a hundred dwelling units and using currently derelict land for blocks no higher than existing buildings along the Norwood Road could more than double that without the disruption now planned.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0065	Vision	Why does the shop frontage along the Norwood road need "renewal" and a "new public space" additional to that around St Luke's. The only good idea in this is a road linking Lansdown Hill and York Hill to potentially relieve traffic along the Norwood Road.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0065	Other	This cruel parody of previous plans for Site 18 (including both the Neighbourhood Plan and relevant sections of Lambeth Plans) is wholly out of place in West Norwood and will almost certainly serve to delay rather than bring forward much needed affordable housing and economic regeneration It contains many errors and falsehoods, some covered in my comments on the Commonplace website and/or in comments which I have "supported", and should be withdrawn. Instead the Council should support the Norwood Planning Assembly in producing realistic plans which will increase the NET supply of good quality affordable housing for local residents – beginning by greatly improving the "routine" maintenance of the York Hill Estate which will be thrown unto shadow by this development.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0085	Site Allocation Policy	Very worried about the potential "tall building" plans - there are no other buildings of that size in the area and I think it would have a hugely detrimental effect on light and space in what is currently a fairly quiet residential area. Also, traffic and parking is relatively busy already in this area so accommodating a large number of people in a tall building will clearly negatively affect traffic and parking	Please refer to the general response to representations made by individuals and businesses.
Individual	R0111	Vision	Site 18 must be struck from the Development Plan; why can't Lambeth stick to the 2021 Lambeth Local Plan. West Norwood is SUB urban, and must remain part of the 'south of South Circular policy'. NO HIGH RISE. Out of keeping and ridiculous. Our councillors and local people have not been consulted, who will buy these flats? They will probably become investments for rich foreigners The local proposals are not 'plan led' as required by the LLP . West Norwood does not have the infrastructure for this development; transport, services, doctors etc. West Norwood's character will be ruined.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0111	Other	I write to demand the removal of Site 18 and Site 19 from the Draft plan. These are major developments which will badly affect the heart of West Norwood and Tulse Hill. No other Lambeth town centre is to be affected like this and there has been inadequate consultation. We have not been given enough time to understand the proposals and their impact.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>Please reference the 2017 Masterplan and get these plans removed. Incremental development is surely the best way forward for these areas. Please work with community groups and NPA to find a positive way forward.</p> <p>I strongly object to the development plans for these sites. They are completely out of keeping with the suburban feel of West Norwood.</p> <p>We are south of the south circular, the Lambeth plan states there should be no buildings over a certain height outside the south circular. Why is this now to be overturned?</p> <p>Local shopkeepers will not be able to afford the rents. Local people will not be able to afford the properties. Affordable rents are still too expensive for most people.</p> <p>We don't need any more workplace areas, we have a KIBA, Park Hall Business Estate. Neither of which is at capacity.</p> <p>The lack of access at Site 19 means the density proposed is positively dangerous. The tower block is ridiculously out of place and intrusive. The density of Site 18 will adversely affect all those on the York Hill estate.</p> <p>The disruption caused by the works will have an appalling effect on the area.</p> <p>The local infrastructure is insufficient for either of these projects. Yes, we need more housing. But not like this. Please work with Norwood Planning Authority, Norwood Forum and Norwood Action Group to find a better solution for everyone.</p>	
Individual	R0155	Sustainability Appraisal	<p>I feel very strongly that this will have a negative impact on the future environment in West Norwood. With Lambeth Council already approving the redevelopment of the scrap yard with significantly increased heavy traffic, this will furthermore increase traffic in the area. With building works undertaken so close to the high street, there will be an increased pressure on traffic of lorries and major disruption to traffic in the high street.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0155	Other	<p>I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.</p> <p>I strongly object to these developments based on the following points:</p> <ul style="list-style-type: none"> • Very tall buildings proposed that are totally out of keeping with the rest of the neighbourhood. And this will significantly block light and skew the wonderful views we have. • Increased pressure on current infrastructure, particularly increased traffic which is already high with cars coming on/off the south circular. <p>The proposed metal scrap yard will further add to this problem. Parking</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>will be scarce, with no parking proposed for site 18 and 400-500 flats suggested.</p> <ul style="list-style-type: none"> • Reduced air quality due to above points. The current infrastructure is not up to manage increased traffic, with constant jams up/down York Hill as an example which is very close to site 19. <p>I am writing as a local resident in relation to the proposed site 18 in West Norwood. I am very concerned about the impact to local resident and businesses in the area. I have the following questions that I would to have answers to.</p> <p>Why has the community only been given 6 weeks to comment on this development, which has a huge impact of the area for years to come?</p> <p>When is the proposed starting date for building works to start and how long is it planned to go on for?</p> <p>With no parking planned for this site, how will this be addressed as people with cars will look to find parking nearby limiting free parking space for all residents?</p> <p>How will you manage the increased pollution and environmental impact due to increased traffic to area with numerous lorries travelling to site, and more traffic as a result of 400-500 flats planned? And to this the planned metal recycling centre that will further increase heavy traffic into the area?</p>	
Individual	R0170	Other	<p>As a long-time resident of Tulsi Hill/West Norwood, I am writing to demand that Site 18 is removed from this consultation. The proposals have been launched without proper public consultation. The development would destroy the character of the local area and would not provide the town centre and facilities so badly needed. The high density residences, including an 11 storey tower, would create unsustainable pressure on the neighbourhood, especially in terms of traffic and levels of pollution. Instead, I urge you to engage with local community organisations to develop more appropriate plans for a thriving town centre.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0171	Other	<p>I am writing to object to the development of 20 and 10 storey tower blocks next to my road.</p> <p>I have lived in this area since 2001, and have experienced West Norwood's growth and development with gratitude. However, these tower blocks are completely out of character for the area, will cause a significant loss of vista for many of us in the immediate area and have not been adequately consulted on.</p> <p>As a teacher I am very aware of the need for key workers to have access to zone 3 affordable housing and a decent quality of life. These giant aberrations are not the way forward. I fully welcome progress, modernisation and development but these are a step backwards in</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			terms of access to a decent existence for people. These giant blocks do not belong in a quiet, low key neighbourhood characterised by genuinely stable communities and independent businesses. Please do not build them. Rather, take the time to truthfully consult with the local community and create a more intelligent and sensitive solution.	
Individual	R0187	Other	<p>I have just seen the development plans for West Norwood proposed by Lambeth and I'm horrified by this designs.</p> <p>We moved here 6 years ago because the area seemed to have a strong community sense with a 'village' feel: low rise building, small one storey house streets, independent shops. The huge housing bars you propose would totally change this, transforming West Norwood into yet another Elephant and castle/Croydon-like monstrosity.</p> <p>The fact that the community has not been asked to participate in the design process is quite appalling, isn't it? And unusual, I'm told.</p> <p>West Norwood high street does require some upgrade but definitely nothing like what the current plans show.</p> <p>I really hope you will revise these and consider involving the community in the new designs with the aim to improve our neighborhood and not merely cram as many people as possible, not taking into account the current community aspirations.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0191	Vision	Inappropriate scale and density of development. Lacking in accessible public open spaces. Destruction of a high street	Please refer to the general response to representations made by individuals and businesses.
Individual	R0191	Other	I write to register my objections to development proposals on sites 18 and 19 in west Norwood. They are out of character in all respects - physical height and massing and use - and would blight the existing area. Please resubmit new proposals for low rise low to medium density developments with far greater allocation to Public open green spaces. The current high density proposals are wholly inappropriate.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0194	Vision	Disgusting	Please refer to the general response to representations made by individuals and businesses.
Individual	R0194	Vision	<p>I am the manager for the Iceland Food Store and to be honest I am shocked that Lambeth could even suggest the idea that this proposal of destroying the high street.</p> <p>We have seen a massive change in West Norwood in the last few years and they should be proud of that and start to look how they can develop the high street by investing money in shop fronts and helping empty units open to the public .</p> <p>Let's not right of the people the shops and the community to see homes built there is so much other space that can be used in the lambeth area and this is not the one leave us alone</p> <p>We serve the community vulnerable and low income family's taking Iceland and Greggs and the local Butchers Just a few mentioned and</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>there is many more vital shops of the street is taking history from the people ..</p> <p>I urge that the local community be given the chance to put this to a vote and allow there voices to be heard i for one will not stand back and see the high street be take away from us</p>	
Individual	R0194	Other	<p>I am the Store Manger of Iceland Food located in Norwood Road. I am sending this email with frustration in regards to the proposal of redevelopment of this Site to provide homes on the behalf of the Governments requirements.</p> <p>I have been the Store Manager here for Over 7 years and it saddens me that we now have the worry that we could lose the heart of are community.</p> <p>We welcome new homes and re development of areas that are in need of attention and love the idea of new homes to welcome new people valued residents to are community and to are high street .</p> <p>However not at the cost of the high street shops been taken away to see money made from developers. What we need is Lambeth planning team to ensure that they support the high street get the development done in phases and not effecting trade and effecting the community that already live and love Lambeth .</p> <p>My self and other traders have always done everything we can to keep people on the high street providing excelled service and working hard through the Pandemic to support local people and Vulnerable residents</p> <p>.</p> <p>This can not happen to are high street and I ask that you take in to consideration the effect you will have on people residents local community that need these shops.</p> <p>I am very saddened by this and will do everything in my power to ensure we do not leave the high street.</p> <p>This statement is from me personally and my staff at store again Local Lambeth People</p> <p>My company Iceland Foods will be in touch with you directly to speak more legally and take the steps that are needed to protect are store as per are contracts and lease ... This is above my pay grade .</p> <p>Please can you respond to me about what steps are going to be taken to protect the high street and the shops and local Jobs for local people</p> <p>We need this high street and I assure you the community will not want to see us as supermarket or any other shops disappear.</p> <p>Take shops like mine away from the high street and offer the people whom Move to the area no local shops or just retailers that are over priced and charge low income family's over the top for food and</p>	<p>Please refer to the general response to representations made by individuals and businesses.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			essential it's criminal this can not happen Help us and work with us to resolve this matter	
Individual	R0204	Vision Map	The 'Height in metres of existing building' seem to be incorrect as the existing buildings are not of those heights.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0205	Evidence	These hulking megaliths are just horrific and will totally destroy the Victorian heritage of West Norwood. The view from the cemetery is particularly distressing.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0205	Other	Please SAVE West Norwood from this totally unsympathetic re-vamp!!! Restore the building that are already along Norwood Road, helping the businesses and resident there to upgrade their premises. There are thousands of better ways to spend this absurd amount of money than throwing away our village feeling and charm while displacing our businesses and residents.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0218	Vision	It is far too tall. It destroys the neighbourhood by making it cavernous. It removes needed amenities such as the petrol station and a DIY store. It also removes historic buildings which should be preserved.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0218	Other	I am writing to object for the plans for Sites 18 & 19 in West Norwood. The proposed plans would have a severe negative impact on the area. There is has been no adequate public consultation. Developments on this scale would utterly destroy the character of the local area by introducing large high density housing on a massive scale. It threatens many local businesses and homes and completely ignores the need to refurbish exciting council properties. Both sites would increase pressure on local services, block out light, put more demand on parking and would block out light and views for existing properties. The local community should be fully consulted on long term plans for the community and should help with what the future for West Norwood is in fully transparent process.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0223	Vision	The vision is a vast overdevelopment of the site with 400+ residential units putting a huge strain on local resources and increasing neighbourhood traffic.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0223	Other	As a local resident, I ask that Site 18 in its current incarnation be removed from the SADPD. The proposal for 400+ residential units plus buildings of 36m tall is wholly inappropriate for the local area. This will further increase traffic congestion, put pressure on local resources and change the character of the area. The buildings will be visible from miles around and interrupt the current views and skylines.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0241	Vision Map	The public space is tiny. The 81m tall building is totally inappropriate.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0241	Vision	What on earth is a "fifteen minute neighbourhood"? Ditto "public realm" and "pedestrian and cycle permeability"? We are for modernising and developing West Norwood high street in a sympathetic way BUT these plans involve unnecessarily high rise buildings which are unsightly, will increase pressure on local services and will completely change the character of the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0241	Other	We have just learned of these proposals and object strongly to the plans. Please consult properly and openly with new plans which reflect voters and Council Tax payers wishes. An acknowledgement and substantive response to this e mail would be appreciated.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0302	Vision	I am objecting to the proposed development of West Norwood High Street in the proposals 18. I don't feel there has been sufficient consultation and consider it insulting that such a huge development could be put forward without extensive local public consultation. I have lived in West norwood for 20 years, love it, have many friends and neighbours here and feel it is a supportive safe community. I understand that others may look on with envy at our community, it's mix of business big and small, with independence growing. We have an industrial area too, making it a working community. I do not want to loose this with thoughtless development which doesn't take into account the needs and wishes of the people who live here. Growth isn't always about money, wealth is in people and healthy thriving communities who support each other. We need to continue to grow in our own way, not silenced and marginalised by outside organisations just wanting to plunder our rich community for their greed. I was upset and angry to receive a flyer through the door about this. I've not heard anything up to now [Other text duplicating that above]	Please refer to the general response to representations made by individuals and businesses.
Individual	R0304	Vision	The plan looks like it will demolish a huge portion of West Norwood, altering it's character for ever. Whilst clearly there are some opportunites in this space and some buildings that are of little value, there are also some very stunning buildings of great character and complete bulldozing would be a poor solution. I think planners could be much more creative and transform the space whilst keeping the parts of value - particularly some of the shop and brick-work frontages whilst still clearing the more wasted/ugly areas for more modern developments. A lot more creativity required.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0304	Other	I have left comments directly on the website, however the website functionality is very poor so very difficult to access. However also emailing to reiterate that this is a very unthoughtful proposal. Whilst there could be significant improvements to the area, this appears to just bulldoze the good with the bad and completely change the neighbourhood for ever, devastating the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			This is so out of character, please have a more thoughtful and creative approach to this area looking for opportunities to improve but not obliterate. West Norwood has a lot of attractions and as a traditional London Victorian neighbourhood with housing in a style that is recognizable around the world and should not be destroyed. Yet new build in a sympathetic manner on poorly used industrial areas (behind the existing West Norwood housing frontage) would be welcomed. I object.	
Individual	R0321	Site Allocation Policy	I object to this proposal	Please refer to the general response to representations made by individuals and businesses.
Individual	R0359	Vision	I am concerned about the scale of this development which will be completely disproportionate to the existing residents/ buildings/ businesses in West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0360	Site Allocation Policy	Disappointed, I think you could do much better than this or you could involve the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0360	Evidence	This seems to just rip the heart out of West Norwood, I don't see how this is an improvement.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0360	Other	<p>It has taken me a while to find the appropriate and polite words to convey quite how disgusted I am with both of these proposals. Having visited or attempted to cycle around the abomination that is Vauxhall of late I cannot believe that Lambeth are so short sighted as to create a similar monstrosity here in West Norwood.</p> <p>I genuinely question if those proposing this have had a knock on the head?</p> <p>These developments are totally unsuitable to the area for which they are proposed and I have seen zero consultation with residents or community groups.</p> <p>I question why Lambeth are paying lip service to the Master Plan that we have spent considerable amounts of our free time giving input into, incremental development is that way forward, deal with the current land banking issues we have in West Norwood.</p> <p>Stop paying lip service to greedy developers who do not adhere to buildings that would improve the community.</p> <p>Force developers to build sustainably, build affordable property, build cycle storage (not one measly bike hoop, looking at you 7 Thurlow Park Road).</p> <p>Considering the amount of my free time I invest in my local Lambeth community this feels like a kick in the face and I wonder why I bother.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0386	Vision	It is highly inappropriate to propose high rise buildings in this community and remove existing retail businesses.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0386	Other	<p>I strongly object to the proposed plans for high rise buildings for many reasons including:</p> <ol style="list-style-type: none"> 1. The community has had little notice or time for consultation. 2. High rise buildings in a Victorian high street community are totally inappropriate. 3. The buildings disruption would be long term and hugely intrusive. 4. The current businesses and services would be lost. 5. The additional traffic and parking would be unsustainable. 6. The skyline views would be lost forever. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R0390	Site Allocation Policy	<p>The volume of housing proposed is too high, 390-470 flats is a ridiculous amount for the site & area. Most will remain unsold, or empty. The council's money would be better spent upgrading the York Hill Estate behind it.</p> <p>The height of the proposed building is unwarranted. Not only will it block the views of those living in the York Hill Estate, it would not fit with the keeping of the high street/local area it will sit within. Access proposals for service vehicles either via York Hill or Landsdowne is ridiculous. Creating more congestion than there already is in those areas. They are narrow/hilly roads not suitable for increased traffic. Whilst you say traffic will be reduced, how can it be? Out of 470 flats there will be high numbers of residents you have or need a car (for multiple reasons). You mention the neighbouring resident/area not being affected, of course it will be. Please listen to them.</p> <p>The local community does not want this. Please listen to them, or at least come & live here & understand the actual needs/wants of the area.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0390	Evidence	<p>Why would you destroy half of the current high street shops to build this monstrosity? The shops have historical value in terms of architecture. There offer a variety of purposes there already: supermarket, food outlets, independent, charity, clothes wear etc. B&Q is a valuable resource for the local community, especially those who don't have cars. I have personally used it 100s of times during the period I have lived here. Allows quick access to DIY supplies when needed urgently. I'm not able to drive (epilepsy) & unable to get to other such outlets easily. There will be multiple similar people in the local area. The high street 'household' shops do not offer the same supplies so should not be used as a comparison or alternative resource. The only exception to that is the paint at the merchant shop by Tesco's/old Barclays bank.</p> <p>The current shops won't be able to afford the rents required in the new retail outlets proposed. And we don't want the local architecture to be changed. West Norwood is West Norwood because of this! And it's B&Q facility. The air ambulance was able to land on the car park last</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			year when teenage stabbings occurred in the high street. If that wasn't available to do so, there would have not been any other nearby landing sites & the outcomes very different. I know the impact of the use of the helicopter in this incident because I work in Critical Care at King's and my friend was a Trauma Nurse in A&E receiving the patients. The sheer size of the proposal is ridiculous, wiping out the whole of 1 side of our current high street. The time, disruption, noise, pollution involved in such a building, let alone traffic congestion is uncalled for.	
Individual	R0390	Other	I write as a resident of West Norwood & I do so to demand the proposals for Site 18 & Site 19 are removed from this consultation and for new plans to be developed with (& for) the local community. Please do the right thing & take note of the objections to review the developments as requested by those of us actually living here & who have done so for significant periods of time.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0397	Vision	I oppose this development. It will significantly change the character of West Norwood and exceeds height restrictions, especially with the central massive building. Site 18 and Site 19 must be struck from the Development Plan - Lambeth should adhere to the 2021 Lambeth Local Plan. No local people have been allowed input into the creation of these proposals, which are not 'plan led' as required by the LLP. I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0413	Site Allocation Policy	The central site is most certainly NOT appropriate for an 81m tall building. Completely out of keeping with the surrounding area, far exceeding the height of any other building. It would cause irrevocable harm to the streetscape of the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0413	Vision	Your vision does not at all relate to the proposals. I don't see how destroying one side of the High Street and erecting a giant, completely out of character tower block is of any benefit to the area	Please refer to the general response to representations made by individuals and businesses.
Individual	R0413	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0429	Vision	No! Too many big tower-blocks!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0429	Other	As a long-term resident of West Norwood (approx 35 years) I was dismayed to hear of the proposal to develop these sites on Knollys Road and Norwood Road. It seems very sudden and unannounced. I suspect these development consultations of being driven by purely commercial considerations with little thought for the impact on on local residents and businesses. The main objection to this consultation is that local community	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>organisations have been involved only minimally. In Lambeth Council's own words, The strength and willingness to engage of the West Norwood and Tulse Hill community have been allowed to play no part! For this reason I join with other individuals and groups in demanding that the proposals for site 18 and site 19 be dropped from the consultation, and that a fresh consultation be begun, with the full involvement of the local community.</p> <p>The proposed developments within West Norwood and Tulse Hill, of the Knollys Road triangle, denoted Site 19, and the section of Norwood Road, denoted site 18, are highly unwelcome to me for many reasons.</p> <p>1. As outlined, they seem terribly harsh and unsympathetic to the needs of the locality. We do not need huge tower-blocks that will alter the character of the area, create additional traffic, worsen the air quality, close well-established local businesses, create more demand on services, wreck the local skyline - and generally disrupt the quiet, durable community which I have lived in for about 35 years.</p> <p>2. It seems that these two West Norwood developments are the only two, out of an extensive list of proposals, to be located in a Lambeth 'town centre'. For this reason a much more thorough consultation seems appropriate.</p> <p>3. Various rules seem to be being disregarded. The blocks would include an 11-storey skyscraper that would contravene existing regulations. The announcements are silent about the environmental targets of the project - both of the actual construction process and the sustainability of the buildings when completed. The development proposals have also flouted the principles of consultation and co-operation with the local community, as laid down in the 2017 Master-plan.</p>	
Individual	R0435	Evidence	<p>I have read this evidence document thoroughly and am deeply disappointed at the total lack of apparent concern for the impact this project will have on our community. Plenty of time was spent thinking about how the new buildings will affect the view from different angles, but there is a total lack of detailed thinking or planning about how they will impact our lives. All the vague talk of "affordable housing" - what about the people who live there now but will not be able to afford the new "affordable" rents? What happens for the 3, 4 or 5 years (or more) it will take to redevelop the site? Where are the new bike lanes? There was a more modest (but still quite large) plan under the earlier Lambeth Plan, but somehow it's been tossed aside for this giant developer-led (ie, profit-led) fiasco? Expect some serious pushback from the West Norwood community on this - we're not just going to sit back and let you bulldoze our high street!</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0435	Other	As a resident of West Norwood, I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. Such a consultation was done a few years ago, and this new "vision" not only doesn't reflect that plan but goes against the spirit of everything you as a Council claim to stand for. Stop pandering to the greedy developers!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0446	Other	I am a resident of Tulse Hill and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0455	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0471	Vision Map	I would prefer the character of the area to be preserved. The tall building will impact on the iconic view of St. Luke's Church and no doubt will be of the usual poor architectural standard we've come to expect. Why place it here where it will overshadow the community space? The only function is to line the pockets of developers who undoubtedly will live elsewhere. The idea of a community square here is great, but the shops on the parade are very successful and characterful. Preserve them and work around. There was no consultation before this and there is not enough time for people to respond. This series of pages is extraordinary difficult to navigate. It's almost as though you'd rather not have to bother with a consultation and are just pushing it through to max out the profits.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0471	Vision	The is no justification on any grounds for a tall building in this area. It is clearly to line the pockets of developers and will be a gateway for more excess in the future. No one on West Norwood wants a large building. We are not Vauxhall. Furthermore we have a strong and coherent community here and will resist what appears to be rapaciousness.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0471	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community #consultthecommunity	Please refer to the general response to representations made by individuals and businesses.
Individual	R0484	Vision	Why is this needed? Creating a new town look will loose West Norwoods uniqueness. If it's for affordable housing, I am more supportive but I want to see facts and figures not a subjective vision	Please refer to the general response to representations made by individuals and businesses.
Individual	R0484	Other	I am a resident of west Norwood and I demand that sites 18 & 19 are removed from consultation and new plans developed in collaboration with the local community. The current plans are not in keeping with the community and will have detrimental effects. Thank you for listening	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0509	Context	Interesting	Please refer to the general response to representations made by individuals and businesses.
Individual	R0509	Sustainability Appraisal	Interesting appraisal but these don't seem to be the factors driving the plan	Please refer to the general response to representations made by individuals and businesses.
Individual	R0509	Site Allocation Policy	It all pays lip service to admirable considerations, but is driven by housing targets and hence profitability for developers.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0509	Vision	It recognises many aspects of WN and this site, but the implementation of this vision is then driven by financial and developer considerations	Please refer to the general response to representations made by individuals and businesses.
Individual	R0509	Vision Map	It reveals the alarmingly large area that is up for redevelopment.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0509	Other	I demand that Sites 18 and 19 be removed from this consultation and new plans developed with the local community. Because: this will totally transform the neighbourhood there has not been adequate consultation the consultation process is being rushed through	Please refer to the general response to representations made by individuals and businesses.
Individual	R0540	Vision	In proposing to demolish the old buildings on this plot, you are demolishing the essence and character of West Norwood. There is not only historic architectural importance to preserving the integrity and character of old buildings for preservation purposes, but there is an important ecological purpose in keeping carbon footprints down. I thought Lambeth had declared a Climate Emergency. New building projects don't support the climate and ecological emergency concept in my opinion so I won't be supporting this project. Also, when I hear new housing in development plans, it points towards greedy property developers gentrifying an area and pricing local working people out in favour of richer high income earners. Lambeth council - sadly you have a terrible track record of this in our borough. Your actions over the years speak way louder than all your fancy words.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0540	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0552	Context Map	It is far too big and destroys the shopping facilities of the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0552	Other	I'd like to object to both of the above developments (Sites 18 and 19). They are both too big and especially in the case of 18 destroys the local shopping facilities. These are useful shops, providing a vital resource for the area. If the development were to go ahead it doesn't seem to provide sufficient parking spaces. What will happen to the local streets? I object most strongly to this development, and it should be stopped.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0554	Other	Please note that I strongly object to the over dense and vastly over bulked proposals for the above two site [Sites 18 and 19]. This is so far from the councils' own guidelines that it needs a root and branch investigation as to how it has advanced so far without any consultation with the voting inhabitants of the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0577	Vision	The proposals show a complete misunderstanding of the needs of the West Norwood community. Such poorly considered wholesale changes to a significant stretch of the high street will not be beneficial. What is needed is a plan for the regeneration of the site which is driven by community benefit, and this would be best achieved via an incremental approach which is built around exceptional design. We want a high street that we can be proud of. The plans are a lazy imposition of overly tall buildings which are totally unsympathetic to the character of the town centre. They must be withdrawn from the SADPD and reconsidered from scratch.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0582	Site Allocation Policy	Disagree	Please refer to the general response to representations made by individuals and businesses.
Individual	R0582	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>I am a resident in West Norwood- [redacted].</p> <p>I demand that you remove Site18 and Site19 from the SADP. West Norwood is starting to be re-generated and this will have a great impact into the heart of West Norwood and Tulse Hill. The consultation process must include the community and give them enough time to understand the long-term proposals and impact of these. All previous consultation has been ignored.</p> <p>The reasons I would like to object to both these sites is as follows-</p> <ol style="list-style-type: none"> 1. It is a monster high rise development which will be completely out of character with the current low-rise surroundings in West Norwood 2. The current retail shops on Norwood High Street could lose their livelihoods as the works would take place over years 3. Daylight and sunlight will be taken for many homes and people's gardens overlooked 4. There will be more traffic and increased parking required in surrounding streets 5. The site will require the removal of trees and wildlife 6. The disruption this development will cause to the area will be detrimental to current local businesses and residents as it will take years to build. This is not a way to encourage families in the area 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0603	Context	It is clearly written by someone who knows nothing about the area. Local residents only found out about these plans by chance, not from Lambeth.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0603	Vision	Totally out of keeping with the neighbourhood. Huge reduction in shopping choice for residents. Death of the high street!	Please refer to the general response to representations made by individuals and businesses.
Individual	R0603	Other	<p>I found out about these plans by chance from neighbours. I did get an email from Lambeth on February 3rd about cycle lanes in Brixton. I did not flick down the page to find where this essential information was hidden.</p> <p>My objections</p> <ul style="list-style-type: none"> • There has been hardly any meaningful consultations and no local community involvement whatsoever. Both these developments will have a hugely significant effect on the livelihoods and well-being of local residents. (I have lived at [redacted] for 37 year and prior to that at [redacted] for 7 years). Where can large scale models be viewed? I have seen nothing in 3-D. • The plan involves the destruction of important shops, cafes and a pub. Obvious loss of livelihood. During any such huge scale development, there can be little doubt the whole area will become unsafe and dangerous for local residents. Crime will escalate, as properties are destroyed. • Yes, there is a need for more housing across the country but in a densely populated area such as this, such a huge scale change is inappropriate. And the area would become even more densely populated, with all the issues that invariably arise. • So called affordable homes at 80% of market rent (and the purchase equivalent) are not affordable to the vast majority in this area. If this is in part a serious attempt to alleviate housing shortage, it needs to be better than this. The average local income must be taken into account to work out what 'affordable' really means. 80% does not do it. • This plan includes an 11 storey block! I guess it is deliberate policy of Lambeth not to supply 3-D models or diagrams. I needed neighbours to show me this. • This development would almost certainly overwhelm local services, which would not be able to cope. The West Norwood sports centre caused a huge strain on water supply and sewage disposal, to the extent that Thames Water could not cope. This development would be lot worse. <p>I urge Lambeth to think again and remove these proposals; to discuss new plans with the local community fully involved in any developments, which has clearly not been the case. To consult is not the same as involve. We deserve better than this. There is need for development</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			and updating on Norwood Road, but wholesale destruction is not the answer.	
Individual	R1612	Other	<p>RE: Site 18 and 19 – West Norwood, Lambeth</p> <p>I am writing to oppose the development proposed for West Norwood that would sit in the triangle of Harpenden Road, Knolly's Road and Leigham Vale.</p> <p>The development is very large, both in the 68 metre width and the number of stories (floors) of the buildings proposed.</p> <p>The plan does not sufficiently outline a full impact and benefit analysis.</p> <p>Areas for specific consideration are:</p> <ul style="list-style-type: none"> • Access to the site, damage to existing roads, the disruption in flow of traffic and public transport including trains and buses, noise pollution for the residents in the area (many now working from home some of the time) • The additional pressure GP surgeries in the area • The additional pressure on hospitals that serve the area – primarily St Georges and Kings College hospital • The pressure on schools and classroom sizes • Public transport, trains to and from London Bridge, Victoria, Sutton etc are often over crowded with standing room only • The increase in levels of traffic in the area with a large area around Knight's Hill being a one way system • Air quality from transportation is already an issue with many roads in the area and just beyond now either cut-off to traffic for part of the day or permanently • The loss of green space, and therefore impact on the environment and the health of the area – people, flora and fauna. • The additional pressure on the surrounding green spaces. • The closure of businesses will mean local jobs lost and will directly affect the number of amenities available to people locally. This will be detrimental to the community feel of West Norwood to which enormous effort has been made e.g. West Norwood Feast. • The size of the buildings will decrease the amount of natural light to existing buildings, causing a loss of amenity to people and families already living in the area. • The proposal contains a plan for a building that is the tallest south of Vauxhall in a primarily 2 -3 story residential area. • The eleven story building breaks Lambeth's planning rules. • The higher density of housing in an area already dense with private and social housing is not in the best interest of the existing residents in West Norwood. <p>What the plan fails to deliver is a broader picture of how the area will</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>cope with regard to increased demand for public transport, increased pollution, loss of shops and jobs, increased demand on health and educational services and loss of green space in London.</p> <p>The plan does not deliver overall consideration for the impact of the size of the buildings proposed, their design or height in relation to the surrounding buildings, homes, and businesses. Additionally there will be a significant loss of homes that have been built in the last 10 years in the area, and the loss of historic facades along the high street.</p> <p>Proposals for Site 18 and 19 should be removed and reconsidered more holistically, with consideration to the planning rules in Lambeth, with a minimum 6 month time frame for the community to respond to each building stage rather than to this one large proposal as it will have a significant impact on the area forever.</p> <p>The Council should not agree to such a large development in one stage. The planners should be required to return for permission at successive stages so that the impact and benefit analyses are repeated.</p>	
Individual	R0622	Site Allocation Policy	<p>Land Uses</p> <p>"This site..." This is an example of the multiple contradictions in the draft SADPD. It appears that you would like to portray an ideal comprehensive plan but are also admitting that development is likely to be piecemeal. The danger of this is that the most lucrative options for developers will be realised and the desirable aspects for local residents will fall by the wayside. To be specific, my concern is that if the draft should be accepted in its present form, it would be easy to acquire land behind and to the south of Greggs and build an inappropriate, yet profitable, tower, leaving little incentive for the completion of a supposedly comprehensive plan. Developers' 'cherry-picking', in other words.</p> <p>Affordable housing</p> <p>On the matter of housing, there is a recent development above Iceland, which was formerly a Snooker Hall. Why not retain this and other accommodation in sound buildings, such as Snowe House? These buildings are of an appropriate height for the locality. Refurbishment, if required, has a lower environmental impact than wholesale regeneration.</p> <p>Building heights and views; townscape</p> <p>I think you will find that any building exceeding 25m is not considered 'appropriate' by many local residents. The entire site is suitable for buildings of around 15m (57m AOD) to 21m and a new public space, as otherwise described.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0622	Evidence	<p>The images in Site 18 Evidence Document are out-of-date, and do not necessarily represent latest developments. For example, Figure 5, shows "This That and the Other Discount Store". This, undoubtedly, provided a valuable service to the local community but was not, possibly, as attractive as "Knowles of Norwood", the thriving hostelry which has replaced it. This is, essentially, a fine building and should be retained along with the adjacent "Snowe House". Figure 6, shows the old "West Norwood Snooker Club" above the Iceland store. This has been remodelled in the last few years to provide accommodation. As the redevelopment must have been approved by Lambeth, surely the architectural quality can no longer be low or average? Is there scope for refurbishing the other shops in this parade in a consistent manner to provide better accommodation with an appropriate height (15m).</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0622		<p>Building Heights and Massing 4.4 Why have you effectively torn up Lambeth Local Plan 2020–2035, Policy Q26 Tall buildings? No buildings above 25m in South Lambeth.</p> <p>I think you've got this the wrong way round because you are suggesting that the buildings will not look out of place in relation to the York Hill Estate which is on higher ground. This is a specious argument. You might as well say any building in West Norwood does not look out of place as long as it is no taller than the houses at the top of York Hill. You know these buildings will look out of place. Those on Norwood Road are two stories higher than the buildings on the other side of the road. The development profile does not follow the lie of the land. It would be acceptable if the new buildings were 5 stories high adjacent to York Hill estate and 4 stories high at Norwood Road. The tower, of course is blatantly indiscreet and totally out of place in suburban West Norwood.</p> <p>This drawing gives creates the false illusion of neat, coherent development. The reality, as you have indicated in the 'Land Uses' section is that development land is likely to become available in a piecemeal fashion. It is quite likely that some land will not be available within the timeframe of this plan. The proposal requires demolition of perfectly adequate buildings. Better to retain and refurbish, which will have less environmental impact.</p> <p>Building Heights and Massing 4.7 It gets worse?!?! TVIA IMAGE 12- Chatsworth Way at corner of Idmiston Road It's just awful!</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0622	Vision Map	The location is not appropriate for a tall building and this proposal is at odds with Lambeth Local Plan 2020–2035, Policy Q26 Tall buildings.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0622	Vision	The visions sounds good. Especially if 'development of high architectural quality and detailing' can be ensured and not compromised by commercial considerations. I am concerned by some of the illustrations I have seen which show an inappropriately tall building on this site.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0622	Other	<p>I am writing to object to the inclusion of Site 18 and Site 19 in the Draft SADPD for the following reasons.</p> <ul style="list-style-type: none"> • There has been insignificant consultation with the local population. • The proposed buildings on Norwood Road are too high, being two stories higher than those on the opposite side. This will create a 'canyon effect'. • The proposed tower is of an inappropriate scale for the suburban neighbourhood. The approach to the tower 6/7 storey tower housing Elmcourt Surgery from Avenue Park Road is overbearing. The 11 storey tower (comparable to Northwood House in Hamilton Road – but without the surrounding green space) will dominate the town. • The plan will cause uncertainty and planning blight to businesses and residents for years. • The overall plan is potentially unachievable in any case because of the complex land use and ownership issues. • A major re-generation project as envisioned will involve years of disruption, traffic noise, pollution and adverse health effects. • Several perfectly adequate buildings will be demolished and replaced. <p>I am not opposed to the development of Site 18 but I think it should adhere to the following principles.</p> <ul style="list-style-type: none"> • Lambeth Local Plan 2020-2035, Policy Q26 Tall Buildings. • New buildings should be of a similar height to existing, retained buildings and follow the lie of the land. That is, 5 stories near to the York Hill Estate and 3/4 stories on the Norwood Road frontage. • There should be a presumption for refurbishment and retention of existing buildings. I suggest that Snowe House and the adjacent building (currently occupied by Knowles of Norwood) are in this category. The premises above Iceland have been recently repurposed as flats. This style of development might be extended along the terrace. This would improve the homogeneity of the facades. • These types of improvements could be accomplished in an incremental, organic fashion which would reduce the scale of disruption at any one time. • The techniques used for refurbishment involve transferrable skills which are applicable to the maintenance of London's existing housing stock, in contrast to the industrialised techniques typically used for new builds. 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<ul style="list-style-type: none"> • Minimise disruption to the B&Q store which is an important shopping destination in West Norwood. • New buildings behind the shops should be mansion blocks of a similar overdevelopment to those on the York Hill Estate. 	
Individual	R0660	Vision	I've lived in West Norwood for 15 years. And this is the first I heard of anything being done. And it was not through Lambeth it was social media. Lambeth don't care about what people think.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0660	Other	I am a resident of Lambeth West Norwood and I strongly disagree with the proposal of 18 and 19	Please refer to the general response to representations made by individuals and businesses.
Individual	R0665	Vision	Excellent idea	Please refer to the general response to representations made by individuals and businesses.
Individual	R0675	Vision	What guarantee is there that developpers will aim to maximise income from seling smaller shop lots rather than larger shop lots for stores like ICELANDS & B & Q? West Norwood Feast is an examplar of community cohesion and innovation. The residents / community needs to be invovled in co-production in the development process	Please refer to the general response to representations made by individuals and businesses.
Individual	R0675	Other	As a resident of West Norwood, very local to the proposed development, I request that the proposals for Site18 and Site19 are removed from this consultation and that new plans are co-developed with the local community and community groups.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0678	Other	<p>I welcome the development of these sites [18 and 19], however I have serious concerns about the proposals:</p> <ol style="list-style-type: none"> 1. The height scale of the proposed building is way out of proportion to the area. It will impact negatively the skyline and surely affect local residents light. Plainly speaking, it just doesn't seem in character with the local area. 2. Provision of new cycling initiatives, green spaces is great, but what about established trees and associated increase in traffic and parking competition? I see no plan for mitigation of these effects. <p>I hope these concerns will be addressed. Thank you.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0709	Vision Map	An 81m extreme high-rust residential is completely wrong for this site. Please, please, please don't disfigure our high Street and community like this.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0709	Vision	This needs to be withdrawn immediately pending a full and proper consultation with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0709	Other	<p>As a West Norwood resident I object in the summer possible terms to the proposed developments of site 18-19.</p> <p>Extreme high rise residentials are completely unsuitable to the area. Indeed I'm unaware of any area in which high-rise residential has been successful over anything but the shortest of timescales (just take a look at Croydon) - this being the case why is this going ahead?</p> <p>The timeframes for consultation are completely insufficient and the</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			designs and 'vision' advanced are totally unacceptable. Please reject these plans and deploy a proper community consultation.	
Individual	R0733	Context Map	<p>I object wholeheartedly to the scale of the proposed developments at Site 18 and Site 19. Please be aware that they are detestable to those who live around here and who care about their neighbourhood and quality of life. Please REMOVE SITE 18 AND SITE 19 FROM THIS CONSULTATION and develop new plans WITH THE LOCAL COMMUNITY. Thank you.</p> <p>P.S. I have indicated my 'AGREEMENT' with several criticisms of the various parts of the proposals submitted by other residents as they have appeared - but it occurs to me that by AGREEING with the negative feedback, the site may have counted my "AGREE" as approval of the proposal aspects. THIS IS NOT THE CASE - so several of those "IN FAVOUR" TICKS are mine which were NOT IN FAVOUR! Poorly designed feedback form.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0733	Other	<p>I am a resident of West Norwood and I ask that the proposals for Site 18 and Site 19 be removed from this consultation and new plans developed with the local community.</p> <p>My family of four moved to Lancaster Avenue, West Norwood, in 2004. Since then we have been joined by a friend and our daughter's daytime team of three PA/support workers.</p> <p>Over recent years, principally since PM David Cameron's promotion of the idea of the "Big Society" and how local communities should co-operate to help themselves and provide more services and assistance for their most vulnerable members, we have participated in much activity around envisioning and planning the sort of neighbourhood development residents and businesses wanted to see, in partnership with architects and planners. Development plans were published. One of the agreed principles was to preserve what was valued in the area, its distinctive architecture, keeping the height of new buildings in line with existing premises, especially on Norwood Road in the centre of the planned regeneration. Discussions were held as to the nature of facilities around the central square providing a safe social space where local people might meet and sit.</p> <p>The overwhelming level of engagement from local residents was demonstrated by submissions from several interested groups, some set up for that very purpose, as well as from the many hundred enthusiastic individual contributors.</p> <p>The dismay we have felt with recent repeated planning applications not at all in line with the agreed 'masterplan' for West Norwood - those involving an increase in heavy vehicle traffic and polluting congestion submitted repeatedly by commercial concerns and, now, multi-storey</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>blocks that would themselves dominate the skyline in this distinctive and characterful neighbourhood and worse, set precedents for future developments - verges on the insupportable.</p> <p>West Norwood has changed for the better in many ways since 2010. The sense of common community has been fostered by the celebrated Feast markets and associated activities and a proliferation of not-for-profit and community interest companies has improved life for many vulnerable and fragile people, supporting Council and other statutory services. Introducing and approving plans that put the 'community' feeling and flavour at severe risk is madness, in my view.</p> <p>On behalf of me and my household I would ask sincerely that proposals under current consideration for Sites 19 and 18 of the overall Lambeth plan be blocked immediately unless they are dramatically redrafted and, in particular, the height of buildings is reduced to be more in keeping with those currently surrounding both sites.</p> <p>West Norwood should not become another Croydon town centre. Our wheelchair-using family members are hugely uncomfortable there because of the overdevelopment of the seeming-skyscrapers that proliferate, belittling pedestrians. This is really not suitable at all for our local community, intimate by comparison that in itself fosters a feeling of "belonging".</p>	
Individual	R0762	Vision	I object to this proposal. This site is not size appropriate and will spoil West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0762	Site Allocation Policy	Local independent businesses need to be protected. The proposed residential tower is far too tall for the area. Making new affordable homes is much needed but provisions also need to be made for the increase in population - road infrastructure, parking, school places, GP and dentist places. Have these constraints been considered at all? Perhaps half the size of the tower and make it all affordable housing rather than 50%.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0762	Site Allocation Policy	The planned residential tower is far too tall, it will be 4 times higher than any other building in West Norwood and out of keeping with town.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0762	Other	<p>The proposed towers are far too tall and are completely out of character with the local area.</p> <p>The area is lacking the infrastructure for so many new homes. The surrounding roads cannot sustain an increase in the number of cars, nor is there space to park more cars.</p> <p>Local amenities are already oversubscribed, where will the additional school places come from? Or GP and dentist places? Increasing the number of homes without provisioning for these amenities is irresponsible and detrimental to existing home owners and the</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			proposed new home owners. Local independent businesses need to be protected. Will our local independent businesses first refusal on new units if theirs are demolished/renovated? Will independent businesses be priced out by multinational chains when the new units open? How does the demolition of buildings fit with Lambeth policy on the Climate Emergency?	
Individual	R0767	Vision	Furthermore (to comments previously sent) there should be a greater ambition and allocation of affordable housing and an ambition to substantially increase the retail and commercial space including community usage for flexible working and artist studios	Please refer to the general response to representations made by individuals and businesses.
Individual	R0767	Vision	Much of the description is premised on the details of the design proposals which have not been sufficiently developed. The area include substantial established retail units and decent building stock (to Norwood Road) which should be protected / retained within any wider redevelopment	Please refer to the general response to representations made by individuals and businesses.
Individual	R0767	Site Allocation Policy	The is no mention of car parking within the proposals. There is already pressure on parking within the area and therefore within this proposal the council will need to confirm there is zero parking (with no option for occupiers to request parking permits) or that all parking is allocated to the site, again with no allocation for site parking elsewhere for residents - the document is mute on this topic	Please refer to the general response to representations made by individuals and businesses.
Individual	R0767	Evidence	The photos used in many instances are historic (eg discount store) and does not reflect the vibrant retail scene that exists at this section of the high street with, established retails units, quality opticians, local community pub/bar, lots of local independent retail units including cafes, hairdressers, butchers, convenience store, etc. The documents is collated is not reflective of the actual high street environment (for which I can provide photographic evidence to prove) and appears to have been collated to deliberately paint a negative picture of the section of the high street	Please refer to the general response to representations made by individuals and businesses.
Individual	R0767	Vision Map	There is little detail of the urban blocks or potential phasing, which would describe the urban gain of the proposals, nor is there an obvious reason why a pedestrian linkage is proposed opposite Chatsworth Way, as it leads no where and does not link into the street pattern west of the site. Any linking will need to be much more nuanced and subtle and tie to the existing York Hill Estate	Please refer to the general response to representations made by individuals and businesses.
Individual	R0767	Site Allocation Policy	There is not townscape language of tall buildings within this vicinity. Any redevelopment should respect the existing building heights, maintain parapet heights to Norwood Road and adjacent Streets and provide a series of urban blocks that repairs the urban gain of this area. Access or exist onto York Hill should be avoided particularly for larger service and	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			waste vehicles. York Hill is already a busy road, with narrow pavements, a narrow carriageway and any additional vehicles will only reduce the safety for pedestrians. York Hill is already a busy street for pedestrians, with a poor public realm environment and the addition of more vehicles will only exacerbate this	
Individual	R0846	Vision	Site 18 and 19 profoundly impact the retail and residential heart of West Norwood and Tulse Hill. There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact. The development is too big and not in keeping with the local character.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0846	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. Site 18 and 19 profoundly impact the retail and residential heart of West Norwood and Tulse Hill. There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact. The development is too big/high and not in keeping with the local character. We recognise the desperate need for new, affordable accommodation for local people but we want to see local homes designed in collaboration with local people. And to retain the independent character of our high street, community and way of life.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0854	Other	I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0863	Vision	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0864	Sustainability Appraisal	It is a list of feel-good statement without any secure evidential base. It refers, for example, to Site 18 as a "brownfield" site. This is true for part of the site, but the plan also involves the demolition of a good 25% of the perfectly functional - and in some cases recently redeveloped - buildings along Norwood Road.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0864	Vision Map	It is unnecessarily destructive of the existing range of large and small businesses along the high street.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0864	Vision	While aspect of the "vision" address problems with West Norwood High Street, the plan as a whole seems unnecessarily destructive. It would enormous amounts of planning blight and construction work on a busy road and fundamentally change the nature of the neighbourhood. It should be ditched, and replaced by community-led proposals for sensitive and incremental development that closely involves the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0864	Other	<p>I am a long-term resident in West Norwood, and I am writing to object to the "vision" proposed for Site 18.</p> <p>The draft sustainability report describes Site 18 as a "brown field" site. This is simply not true: at least half of the site is a long-established and varied range of shops and other outlets that provides great value for the local community.</p> <p>The plan calls for the total destruction of at least 25% of West Norwood town centre, and its replacement by an ugly and out-of-scale development of mega-blocks and a residential tower. This seems to be in direct conflict with the vision for West Norwood expressed in the Lambeth plan, which describes it as a low-rise suburban neighbourhood.</p> <p>This would result in planning blight, the loss of a wide range of valued amenities (Iceland, B&Q, Knowles to name but three), and an extended period of major disruption from demolition and construction work.</p> <p>These plans are poorly designed and badly argued for. If they were to go ahead, large areas of West Norwood - particularly the major part of the high street - would be massively and negatively affected by blight and construction work for years. The effects of this are not limited to the areas designated as sites 18 and 19, but would unpredictably affect the wide community.</p> <p>The plans should be scrapped, and replaced by proposals for much-needed incremental development produced in consultation with the local community.</p> <p>The plans for Site 18 should be scrapped and new plans for the development of the brownfield sites behind the high street produced in consultation with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0883	Other	<p>I am writing as a resident of Lambeth to lodge my concern about the proposed developments in West Norwood - Site 18 & Site 19, overdevelopment:</p> <p>My concerns are the height and scale of the developments are not in keeping with the surrounding area or the character of West Norwood which isn't an inner urban area, but a leafy area characterised by Victorian properties and a busy dynamic High Street.</p> <p>This is not an area with other high rises, which is part of the character of the area. Can this be scaled back? Something in the range of 6-8 Storeys would seem far more logical and not jar with the low rise surrounding area. The scale and density of this new proposal will overwhelm the high street and stretch the infrastructure of the area to the limit.</p> <p>There is of course a real need for housing across Lambeth, but there must be ways of supporting housing needs without putting people,</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>including those with a range of needs, into a small structural footprint.</p> <p>Impact on local business: Losing businesses such as B&Q, the petrol station, Knowles and Greggs will be a huge blow to local business. These businesses alone draw large numbers of people to the high street and surrounding businesses.</p> <p>Consultation and the future: It is disturbing that this plan has not been developed without the input of the local community. Improvements to Norwood High Street and surrounds have been discussed by Lambeth for many years, and development is welcome. But as residents we should all be given an opportunity to have our say and to contribute to these plans. For example, how does this fit in with Lambeth's Net-Zero environmental targets? Why are there no new retail opportunities in this proposition? What further improvements to the High Street does this development propose? Has there been any sort of Transport consultation? What about local schools?</p> <p>Is this part of a larger scheme to improve the area? There seems to be no coherent strategy including environmental concerns and whether the local area can support high density 11 storey properties with no additional retail or common spaces being developed.</p> <p>Please acknowledge my concerns, register my questions and consult with local residents and suspend this plan until there has been a full and transparent consultation with the local community.</p>	
Environment Agency	R0886	Other	<p>Current flood zone designation: 1 Rivers on / adjacent to site / flood defences: No Permitted waste site within 250 metres: No Groundwater Source Protection Zone: SPZ2 Comments to add into site allocation text: Protect groundwater from contamination sources</p>	Noted. The draft site allocation policy has been amended to reflect this representation.
Individual	R0898	General	<p>Norwood Forum is producing a detailed written response which will be sent via email.</p> <p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0916	Vision Map	<p>More detail around the size of the green/community space would be great (as big as possible please)</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R0916	Site Allocation Policy	<p>The pavement is already wide on the York hill side, with new trees.</p> <p>Knowles of Norwood is a central part of the community and the building has history and character. Please don't knock it down.</p> <p>Love the idea of wide pedestrian and cycle lanes</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R0916	Other	I am a resident of West Norwood. Please could the proposals for Site18 and Site19 be removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R0941	Other	I am a resident of West Norwood and I demand that the proposals for Site 18 & Site 19 are removed from this consultation and new plans developed with the local community involved. I understand the need for more affordable homes but the size of the proposed buildings is completely out of character with this area and insufficient time has been allowed for proper consultation with residents. I also think if so many homes are to be build in the local area then more consideration needs to be taken to improve services such as schools & GPs, as well as local transport infrastructure.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0942	Evidence	These documents are almost useless. I'm someone who runs a building and development company. We take pride in the work we do for our clients and the people who appoint us. Whenever we work with our clients we discuss everything that will impact those around them and speak to neighbours etc. The pictures that have been included to highlight the area are over 10yrs old, therefore do not represent the current look or feel of the high street. The designs shown give no sense of the design, scope of disruption, scale, lifestyle, impact, objective. They just show basic paint computer program designs done in a hurry for the need to produce something. It's beyond a joke that something that will have a fundamental impact, hopefully for good, would be presented in this shambolic and amateur way. If this is the 'BEST EFFORT' then this should be rejected before it's even thought about. I have no problem with change, development, modernisation etc but this is none of these.	Please refer to the general response to representations made by individuals and businesses.
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Other	Introduction The proposals for Site 18 in the SADPD are a departure from an existing plan. They follow about 22 years of on-off discussion about this site between local people and council representatives, with a broad consensus that some or all of it would benefit from rebuilding. Starting with local engagement around the UDP in 2000, continuing with the process of producing a Masterplan in 2007-8 and then the Manual for Delivery in 2017 there has been a vision for the site which included a public square, housing, workspace, greening, pedestrian access from Norwood Road and, obviously, service vehicle access.	The proposed site allocation builds up on previous work carried out (including the preparation of the 2007 Unitary Development Plan (UDP 2007), the production of the 2009 Masterplan, the West Norwood and Tulse Hill: A Manual for Delivery, published in 2017), which provided a framework to guide the future development of the site. Previous pieces of work and other consultation work in West Norwood, have provided an extensive and valuable insight on local community aspirations and priorities, such as a desire to support the growth of the town centre and local businesses, to provide new mixed tenure housing, to improve public realm, pedestrian and cyclist permeability and public transport accessibility. This intelligence has informed the content of the SADPD for Site 18.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Other	<p>However, it was always envisaged that building heights would be compatible with existing heights in the town centre. While there is a handful of buildings of up to seven storeys on the outer fringes of West Norwood, most of Norwood's buildings are of two or three storeys. There is one row of four-storey Edwardian shop fronts in the town centre, opposite the north end of Site 18, with the fourth storey windows build attractively into the roof.</p> <p>It was also expected that building heights from ground up would scale up gradually across the site, climbing up towards the York Hill estate rather than blocking views from the estate's walkways, which go up to five storeys in the largest blocks, three or four in the smaller ones. The Manual for Delivery proposed heights of four storeys fronting on to Norwood Road and illustrated what these new buildings might look like with a series of slightly taller buildings behind separated by tree-lined streets and pathways.</p> <p>There was nothing in the Lambeth Plan 2021 to make local people think the council was about to depart from these policies and introduce taller building heights. It referred to housing densities needing to be "optimised", but stated that:</p> <p>"Development in the area will need to be of a scale and form related and appropriate to its context with particular regard to local views and heritage assets."</p> <p>It goes on to say that shopping uses will be "safeguarded and encouraged".</p>	<p>The approach within the Manual for Delivery 2017 for site 18 gave a high-level, illustrative indication of the quantum of development that could potentially come forward at that time. It did not include a detailed delivery plan based on a comprehensive feasibility assessment, which would have been the next step.</p> <p>The feasibility and viability of any development proposals that came forward following the Manual for Delivery would have required further detailed assessment within the parameters of Development plan policy. Since 2017, economic, social and environmental circumstances have changed significantly. The objectives for Site 18 have been revisited and the current context for delivery of sustainable and viable development have been taken into account.</p> <p>Following the Reg 18 consultation new massing scenarios have been tested and indicative massing diagrams have been included in the revised evidence document. Townscape and visual impact assessment testing has shown the new indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Other	<p>The SADPD, with its stated objective of finding new sites for tall buildings across the borough and intensifying development, has completely ignored the local consensus, previous masterplans and the suburban setting of West Norwood, raising heights of Norwood Road frontages to five storeys and plonking a 12-storey tower block behind them. Q1: So the first question is: why? Why does the council want to</p>	<p>Tall buildings can make important contributions towards delivering new homes, economic growth and regeneration. As stated in Local Plan 2021 Policy Q26, in the case of West Norwood and Tulse Hill, being an area located south of the South Circular Road, any buildings over 25m in height are considered tall buildings, while in middle and north Lambeth only buildings above 45m in height would be considered tall buildings.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>encourage tall buildings in West Norwood? At what point did this become part of council strategy for the south of the borough? And why is the SADPD proposing taller buildings in West Norwood than in other sites included in the document in other parts of the borough? Why not have a 12-storey building on Leigham Court Road, for instance? Is a developer already talking to council officers about this site in addition to Site 19 and has that helped to shape the ideas in the SADPD?</p> <p>The Lambeth Plan policy on tall buildings is to support them “in appropriate locations”. This does not seem to us an appropriate location.</p>	<p>Planning application 19/02840/FUL for the site known as the Laundry was approved at Planning Committee on 24 September 2019 and granted permission on 13 March 2020, and is currently under construction. The application involves the erection of two buildings with general heights (measured at roof parapet level) ranging between 60.625 m AOD and 69.975 m AOD (between 15.225 m and 23.175 m above ground level), which translate into six to seven storeys. The general height the revised SADPD Proposed Submission Version suggests for the tall building located at the centre of Site 18 is 75m AOD, just over five meters taller than the tallest of the buildings in the consented scheme and, given the sloping nature of the site, approximately 31 m above ground level in that location, therefore falling under the definition of tall building.</p> <p>Beyond those locations identified as appropriate for tall buildings in Annex 10 of the Local Plan 2021, Policy Q26 suggests that additional suitable locations might be identified during the preparation of the Site Allocations DPD. Site 18 has been identified as one of those suitable locations on the principle 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. The proposed quantum and uses have been tested against those four criteria. These assessments include Daylight and Sunlight assessments of the proposed massing, access and servicing route analysis.</p> <p>Further evidence demonstrates the revised massing does not adversely impact on strategic or local views, meeting the requirement set out in Policy Q26A i) of the Local Plan. Any scheme for a tall building within the site put forward to the council in the future, will need to meet these two requirements as well as the rest of requirements outlined in Policy Q26A.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Other	<p>Lack of consultation</p> <p>Our biggest criticism of the SADPD is the way in which a new vision for the area we represent, which would significantly alter the character of West Norwood and set a precedent for future development, has been offered to the public with the absolute legal minimum of consultation. Under the council's own guidelines, there could have been engagement before the six-week statutory consultation period. This possibility seems to have been ruled out. As local councillors, we could have been told about the plans and had a chance to discuss them before they came to Cabinet. This never happened. The consequence is that the people of West Norwood who do know about the plans (which is by no means all of them) feel the council does not really want to know their opinions and is unlikely to take much notice of them.</p> <p>This flies in the face of Lambeth's approach of working with its residents and local organisations and fully engaging them in policy development</p>	<p>The document 'West Norwood and Tulse Hill: A Manual for Delivery', published in 2017, was the result of a long and fruitful engagement process with the local community. The document summed up the work carried out over a long period of collaboration between the council and local residents and community groups that started with the preparation of the 2007 Unitary Development Plan (UDP 2007) and continued throughout the production of the 2009 Masterplan and the subsequent Local Plan adopted in 2015. Although the Manual for Delivery is not a planning document, its findings have guided the preparation of the most recent Local Plan (2021) and the SADDPD.</p> <p>On 13 December 2021 a Consultation and Engagement Plan for the Regulation 18 consultation of the Draft SADPD was agreed by Cabinet. Based on this plan, Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020, a timeframe for the consultation was drafted.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>rather than talking at them. We would argue it also contradicts the Lambeth Plan.</p> <p>Section 3 of the Lambeth Plan states that: "This vision [ie its spatial vision] will be delivered co-operatively by Lambeth Council and its partners in consultation with all stakeholders including designated neighbourhood planning forums."</p> <p>A six-week consultation does not constitute co-operative delivery. Norwood Planning Assembly, while not formally established by referendum, has been operating with local support for some years and is part of the way through developing a local plan. We believe they should be fully involved in shaping the plans rather than having to share half-an-hour of questions online with other local groups.</p> <p>This online meeting, held two weeks into the six-week consultation period, provided three leading West Norwood residents' groups and the BID with a slide presentation followed by questions. This is the only engagement by the council with residents on the SADPD other than an afternoon with six children and young people from a local youth club in which a consultancy asked about their ideas on the environment and play areas.</p> <p>Q2: Why has the consultation been so rushed? Why did the council not engage residents, businesses and councillors in advance of the formal consultation? And why has the council not even written to residents and businesses within Site 18 to inform them of the SADPD so that they knew about the consultation and could take part in it?</p> <p>Below, we address some of the specific issues raised in the Commonplace consultation.</p>	<p>A full report on the Regulation 18 consultation will be published alongside the SADPD Proposed Submission Version. The report explains in detail the methods the council used to raise awareness about the consultation and to encourage people to respond. The primary method used was Commonplace, the digital consultation platform used by the Council. Supplementary methods included engagement with ward councillors, local MPs, Area Meetings with representatives from community groups and organisations based in neighbourhoods which proposed to allocate a site in the SADPD, presentations, and workshops with Young People.</p> <p>Ward councillors were engaged in meetings on 8, 9 and 16 December 2021, all held virtually following government guidance on the COVID-19 pandemic. Local MPs were briefed on 21 January and 1 February 2022. Both ward councillors and local MPs were invited to join Area Meetings. The Area Meeting for West Norwood was held virtually on 24 January 2022 following government guidance on the COVID-19 pandemic. Ward councillors, local MPs, as well as representatives from community groups and local organisations were provided with the information necessary to support residents in accessing the consultation material and encouraged to disseminate information about the consultation to the wider community. Council's own publicity and dissemination methods included i) notifications by email to over 2,000 contacts, including the statutory, specific and general consultation bodies required by the regulations, but also community stakeholders, ii) publications on social media platforms such as Twitter, Facebook, Instagram, LinkedIn and Nextdoor, iii) a blog post on Love Lambeth, iv) online newsletters and bulletins, v) physical copies of the draft SADPD displayed in public libraries, and vi) a dedicated website. The council also notified up to 1,141 groups through Integrate, a directory of voluntary, community and social enterprise sector organisations that operate in the borough.</p> <p>Following the consultation, the council organised three targeted stakeholder engagement workshops with representatives of the community stakeholder groups that had submitted responses to the Regulation 18 consultation on draft sites 18 and 19 in West Norwood/Tulse Hill. These were held over a six-week period in October and November 2022. These workshops provided an opportunity for Council officers and members to further explore the points raised in the Regulation 18 representations with local representatives. These workshops have helped inform the Council's consideration of the Regulation 18 consultation responses received and the resulting content of the SADPD Proposed Submission Version.</p>
Cllrs Meldrum, Pickard and	R0945	Vision	<p>Vision</p> <p>The vision talks of "sustainable, mixed-use development" of housing, workspace and retail/food and drink uses that "contribute to the renewal</p>	<p>The revised boundary for Site 18 included in the SADPD Proposed Submission Version excludes some of the retail and food premises previously included. Only premises located between 300 and 346</p>

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Winifred (Labour)			<p>of the shopping frontage on Norwood Road", helping contribute to the aspiration of a 15-minute neighbourhood which is a goal of local people as well as borough policy.</p> <p>However, it seems to ignore the sustainability and success of existing shops and cafes along Norwood Road. Although parts of the shopping frontages with flats above are unattractive and run down, the actual businesses occupying them are largely thriving. They have survived a whole year of huge disruption from Thames Water works in Norwood Road during 2019, followed by the pandemic. Some feel that they have lost a certain amount of trade as parking has become more difficult in the town centre following pavement widening on the east side. But generally, shops are busy and were optimistic about the future until they heard about the SADPD.</p> <p>The bulk of businesses on this stretch are small and are run by black and minority ethnic managers and proprietors and many also serve a mainly BAME clientele although they are also used by the whole community. They include a Caribbean bakery, a kebab restaurant and take-away, a Halal butchers which is also a greengrocer and general store, a Turkish café, the town centre's only school uniform shop, a newsagent and two shops selling and fixing mobile phones and other electronics.</p> <p>Q3: Under the current proposals, how would the future of these businesses be guaranteed? Would they be able to occupy new premises at the same rent levels? How would they be compensated during rebuilding? How would they be compensated if they were unable to afford the new premises? And what type of business would be likely to replace them if they were unable to return? What about applying the Affordable Work space policy here?</p> <p>Q4: Is there a danger that successful independent businesses run by people local to South London would be replaced by chains taking profits out of the area? Would this not be less sustainable rather than more sustainable? How does it square with Lambeth's economic strategy of encouraging local business, especially BAME-run business?</p>	<p>Norwood Road will be affected, which translates into one large retail unit, a total of seven smaller retail units and five small units in use as restaurants or fast-food takeaway outlets.</p> <p>The SADPD Proposed Submission Version proposes 3,000 and 4,000 sqm (GIA) of commercial/community floorspace and requires at least 50 per cent of units along the Norwood Road frontage are in shop use. Other town centre and community uses will help diversify and activate the high street, but these will not take up more than 50 percent of the Norwood Road frontage units.</p> <p>Local Plan Policy D4 foresees the possibility of securing affordable retail floorspace through Section 106 planning obligations as a way to mitigate the impact that proposed development may have on the area. This will be negotiated along with other planning obligations at the time a planning application is put forward to develop the whole or part of the site identified in the SADPD.</p> <p>London Plan Policy E3 states consideration should be given at planning application stage to the need for affordable workspace where there is affordable space on-site currently, or has been at any time since 1 December 2017. In this context, planning obligations may be used at planning application stage to secure affordable workspace in those parts of Site 18 where affordable space exists or has existed in recent years.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Vision	<p>At the York Hill end, in 20th century blocks, there is a homeware store, an optician and a large and successful bar, Knowles of Norwood, housed in a former Co-op supermarket which seems quite a nice example of inter-war architecture. One of the flats above Knowles is a former home of the singer, Adele. Above the homeware store and opticians are flats that form part of the York Hill estate.</p> <p>Q5: Would there be some architectural and historic value in retaining the Co-op building within the vision? If these flats were demolished, how would people be re-housed?</p>	<p>In response to this comment and other comments received in the course of the consultation, the site allocation's boundary for Site 18 has been revised to exclude these properties.</p>

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			Q6: Would new council flats replacing those in Snowe House count towards the 50% of affordable housing required by redevelopment on public land or would they be replaced in addition to the 50%?	
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Vision	<p>In between the northern and southern end of the strip are the B&Q store, now owned by Lambeth, and the petrol station. While residents value B&Q, which also brings in people from outside the area, we think most would welcome the replacement of these two premises if the new shop fronts were in keeping with the heights and design of the buildings opposite. But it is essential to build a replacement B&Q before demolishing the current building to allow for continuous trade</p> <p>A public square has always been part of previous plans for the area referenced in the introduction and could improve the shopping experience while providing new space for outdoor events and stalls. But it will be important to design the square so that it provides enough space for these uses Is it going to be in the shade all winter? Will it be hot or cool in summer?</p> <p>More fundamentally, we feel that the “vision” section in the SADPD lacks an actual vision of the long-term future of Norwood. If the site is not developed for 10 to 15 years, as stated, who will live here and what will their needs be in 2030-50?</p>	<p>The SADPD Proposed Submission Version proposes between 3,000 and 4,000 sqm (GIA) of commercial/community floorspace and requires conditions to planning consents ensure at least 50 per cent of units along the Norwood Road frontage are in shop use. The proposed quantum of commercial/community floorspace allows for the reprovision of B&Q, whose current size is estimated at 1,867 sqm. However, opportunities for reprovision and relocation of specific retail units will need to be further explored at planning application stage, when a more concrete proposal is put forward.</p> <p>Daylight, sunlight and overshadowing assessments have been carried out by specialist consultants for all sites included in the SADPD Proposed Submission Version and forms part of the evidence base. The assessment for Site 18, which is based on indicative building shapes and heights, demonstrates the proposed main square in its proposed configuration will receive adequate sunlight.</p> <p>Within the parameters set in the SADPD, any future planning application for the redevelopment of this part of the site will need to positively meet this policy requirement.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Vision	Q7: Will the need to meet carbon neutral goals in 2030 lead planning policy away from tower blocks which require very deep foundations and therefore are more polluting during their construction?	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted.</p> <p>As per London Plan Policy SI2, all major developments are expected to be net-zero carbon in their operation. This means greenhouse gas emissions should be minimised through the implementation of three principles: i) Be Lean, which means using less energy and manage demand during operation, ii) Be Clean, exploiting local energy resources and other energy supplies that are efficient and clean, and iii) Be Green, maximising opportunities for renewable energy by producing, storing and using renewable energy on-site. When the application of these three principles does not achieve a reduction to net zero-carbon emissions, the excess of greenhouse gas emissions should be compensated, amongst other options, by a cash in lieu contribution to the borough's carbon offset fund. This carbon offset fund should be used to implement projects that deliver carbon reductions. Any developments within Site 18 will be required to maximise the contribution towards achieving net-zero emissions on site rather than through off-setting.</p>

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				Only those development proposals that are considered strategic and therefore referable to the Mayor are expected to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment, including embodied carbon, operational carbon and user carbon.
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Vision	Q8: Where will parking be accommodated if the Waylett Place and B&Q car parks are eliminated? What is the demand for parking likely to be in an extremely hilly area in an era of electric cars, scooters and bikes, where people might be looking to use new forms of personal transport to take them down to the town centre at the base of three steep hills to the west, south and south-east? Will there be more older people or more children and what are the implications of that?	Any future application for the development of any part of the site will be subject to the London Plan and Lambeth's Local Plan policies relating to transport, in particular London Plan Policy T6 for maximum car parking standards, electric vehicle charging and Disabled Persons Parking requirements, and Local Plan Policy T6 on car club membership and permit free developments.
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Site Allocation Policy	<p>Site Allocation</p> <p>Building heights and social housing</p> <p>Residents' main criticism of the site allocation policy in the SADPD is directed at the proposed heights of the buildings. While people appreciate the need for more social housing, there is concern that very little of the new housing will be affordable apart from the quantum needed to replace the existing council and housing association flats. We would like to see the policy require the re-provision of the sheltered housing (as social housing for older people) as down -sizing will release family sized social housing</p> <p>Q9: A very important question is to what extent can extra social housing be guaranteed in addition to replacement of existing social housing?</p> <p>Q10: How much social housing would be provided, if any, in addition to the replacement housing?</p> <p>Q11: Can any follow-up document please clarify the difference between the different types of affordable housing, such as council-level rent housing, housing association rent housing and London Affordable Housing? Do all these fall into the description of 70% social rent housing required within the category of affordable housing?</p> <p>Q12: Is there a possibility that developers on the land in private ownership would press for the viability route rather than provide 35% affordable housing? How much at council rents?</p> <p>Q13: How much of the social housing would be family housing?</p>	<p>Following the consultation on the Draft Site Allocations Development Plan Document, the boundary for Site 18 has been modified to exclude Snowe House, Thanet House and 8-20 Lansdowne Hill amongst other properties. As a result, the redevelopment of Site 18 will not affect existing affordable housing units. Only nine market units above shops between 328-346 Norwood Road will be affected by such redevelopment.</p> <p>Any affordable housing provided within the revised boundary for Site 18 will, therefore, be additional affordable housing.</p> <p>Application of the threshold approach to affordable housing as per London Plan 2021 policy H5 (also known as Fast Track Route) for those parcels of land publicly owned (i.e., land owned by LB of Lambeth Council), would translate into at least 50 per cent of the residential properties built on that parcel being affordable units. On those parcels of land privately owned, following the threshold approach would involve at least 35 per cent of all units provided on that parcel would be affordable.</p> <p>As per Lambeth Local Plan 2021 policy H2, 70 per cent of the new affordable housing provided on site should be low-cost rented homes (Social Rent or London Affordable Rent) and 30 per cent should be intermediate products (London Living Rent or Shared Ownership). These products are explained in more detail below:</p> <ul style="list-style-type: none"> - Social Rent: Rents are capped to the relevant Local Housing Allowance level, based on the maximum level of benefit available for a unit in the private rented sector. This means average rents for Social Rent products are around 65% of market rent. Many Local Planning Authorities use other funding sources to increase discounts to better align rents with Social Rents. This product is provided by Local Authorities, Housing Associations and other Registered Providers. - London Affordable Rent: Rents are limited to published 'benchmarks' based on guideline target rents for social rent – hence, London Affordable Rent is similar to Social Rent. This product is provided for Registered

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				<p>Providers only.</p> <ul style="list-style-type: none"> - London Living Rent: A “Rent to Buy” product that allows renters to save for a deposit/future home ownership by providing a lower than market rent. The maximum household income for this type of product is £60,000. This product can be provided by any type of provider, including private providers, as long as the product is maintained as affordable housing in perpetuity. - London Shared Ownership: A form of affordable home ownership where a proportion of the property is purchased by the tenant who pays a regulated rent on the remainder and can increase their share over time by “staircasing”. The maximum household income for this type of product is £90,000. This product can be provided by any type of provider, including private providers, as long as the product is maintained as affordable housing in perpetuity. <p>As per London Plan 2021 Policy H5F, when an application does not meet the criteria to follow the Fast Track Route (i.e., proposing at least 50 per cent affordable housing on public land, or 35 per cent affordable housing on private land) it must follow the Viability Tested Route. This would require the applicant to submit supporting viability evidence in the form of a viability assessment that will determine the maximum level of affordable housing deliverable on the scheme. The same percentages outlined in Lambeth Local Plan 2021 policy H2 (70 per cent low-cost affordable housing products and 30 per cent intermediate products) will apply to the total number of affordable units consider viable/deliverable as per the viability assessment.</p> <p>Lambeth Local Plan 2021 policy H4 sets out the mix of sizes expected from the low-cost component of the affordable housing provided on site. Not more than 25 per cent of the low-cost affordable housing units should be 1-bedroom units, between 25 and 60 per cent should be 2-bedroom units, while the rest should be 3-bedroom units or bigger units (family accommodation), with a maximum of 30 per cent of all low-cost affordable housing units on site being family accommodation.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Site Allocation Policy	<p>The other issue is aesthetics. It seems to us purely a matter of opinion whether a 12-storey tower block “is appropriate” next to the proposed town square, or that other building heights of over nine storeys “may be acceptable in the central part of the site”, or that five storeys with two storeys set back are suitable for Norwood Road frontages and that heights across the site should be from five to seven storeys. Previous plans for the area have envisaged four-storeys on the Norwood Road frontage to match the highest buildings opposite, on the east side of the road.</p> <p>Q15: Why does the proposal push for taller buildings and why do</p>	<p>The height and massing of the buildings proposed for Site 18 have been revised in response to the Regulation 18 consultation. The revision has taken into consideration representations made in the course of the consultation as well as newly available evidence.</p> <p>The site on 6 Lansdowne Hill, also known as the Laundry, which was previously included within the Site 18 boundary, has been excluded. The proposal pursuant planning application 19/02840/FUL, which was granted permission on 13 March 2020 for the demolition of the existing buildings and erection of a part six, part seven-storey building providing residential accommodation and a further four-storey office building, is now being</p>

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			<p>planners think that 12 storeys is appropriate in a townscape of two-to-four storeys?</p> <p>Q16: Would we be correct in thinking that each storey of a modern block tends to be higher than each storey in a block built in the early part of the 19th century? We are, for instance, comparing the height of the two-storey Iceland development built in the past decade with two-storey blocks next to it on Norwood Road.</p> <p>Q17: We agree that the frontages on Norwood Road should “provide a clearly defined parapet line... to respect the context and create a balanced townscape with the Victorian frontages opposite”. But why do planners think that raising the height of frontages to five-to-seven storeys provides this balanced townscape when all previous visions for Site 18 have limited heights on frontages to four storeys (already double the height of most of the existing shops)?</p>	<p>erected. These buildings are now considered part of the immediate built context adjoining the site.</p> <p>Giving the sloping character of the site, referring to heights above sea level (Above Ordnance Datum, or AOD) is considered the most appropriate approach. Existing properties along Norwood Road range between 47m AOD and 55m AOD in height, while buildings on the York Hill Estate side range between 68m AOD and 70m AOD in height. The height of buildings along York Hill (North) and Lansdowne Hill (South) range between 54m and 58m AOD.</p> <p>The tallest of buildings proposed for Site 18 is 75m AOD in height, five meters taller than the tallest of buildings on the York Hill Estate side and 28 meters taller than the shortest building along Norwood Road. The sloping character of the site means that, giving the location of this building at the centre of the site, the total height of the building above ground level will be 31 meters, six meters over the 25-meter threshold that defines buildings as ‘tall buildings’ for this part of the Borough.</p> <p>Using as a reference the height of residential floors in the building on 6 Lansdowne Hill currently under construction (3.150m for typical floors, 3.400m for ground and top floors), a 31-meter-tall building would be a maximum of ten storeys high, therefore, three storeys taller than the tallest of buildings under construction on the Laundry site.</p> <p>West Norwood District Centre develops along Norwood Road, whose frontage is lined with Victorian and 20th Century commercial premises. The high street contained between rail lines, the East side of the road presents a variety of building heights, ranging from ground plus two storeys (503 to 551 Norwood Road) to ground plus four storeys (457 to 461 Norwood Road). Similarly, the West side of Norwood Road presents variety of building heights, ranging from ground plus one storey (324 to 334, 354 to 362 and 376 to 384 Norwood Road, and 36 Knight’s Hill) to ground plus three storeys (252 to 268, 280 to 282 and 286 to 292 Norwood Road, and 18 to 34 Knight’s Hill).</p> <p>The revised wording in the SADPD Proposed Submission Version states that the height of the rest of buildings on the site should ‘create a coherent roofscape rising from the perimeter street frontages to a single highest point within the site’. Building heights along the Norwood Road frontage are not expected to exceed the ground plus four storeys already present in sections of this road.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Site Allocation Policy	The proposal says the development should address the principles of “no harm to views affecting heritage assets” meaning, in this case, views of St Luke’s Church. In the document, after a description of various vantage points, such as views from the cemetery, it concludes there would be no such harm done. Some disagree with this conclusion.	<p>The views assessment has focused on particularly sensitive views in relation to townscape and heritage.</p> <p>The view of St Luke’s Church along Norwood Road from the north is a locally designated view which has been assessed in the townscape and visual impact assessment. The VU-city model has been used to ensure</p>

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			<p>And the glaring omission is any comment on views from further up the hill, including from the York Hill Estate.</p> <p>The views of St Luke's Church from the York Hill estate walkways would already be impeded by the seven storeys allowed on the laundry site by the existing planning consent. But the heights being proposed throughout Site 18 exceed this and would certainly damage views of the church from the estate and other vantage points to the west of the site, appearing incongruous.</p> <p>We would argue that the important view up Norwood Road to the church as you approach West Norwood from the north would also be spoiled by the series of high buildings climbing up the hill to the west which is proposed in the SADPD. The view would seem unbalanced between one side of the road and the other. While we find the current B&Q building and the petrol station already interfere with the sense of proportion that must once have existed, this plan would make that worse rather than improving on the view.</p>	<p>accuracy. The assessment concluded that no harm would result to that view of the church.</p> <p>York Hill Estate was not considered sensitive and, whilst amenity and daylight/sunlight are material considerations, the view residents have when looking out from the York Hill Estate is not a material planning consideration.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Site Allocation Policy	<p>Economic development</p> <p>This section of the SADPD seems to misunderstand the success of West Norwood nowadays as a town centre. Compared with 2000 when the first scheme for Site 18 was laid down, the many independent shops and cafes are thriving and there are two successful larger businesses. It is important to retain the successful businesses we already have. B&Q employs nearly 60 staff and serves as a magnet, drawing in shoppers from outside the area, and should be replaced, either with another B&Q or similar magnet retail business.</p> <p>Knowles is the biggest investment in new hospitality in Site 18 in recent years. Is this important local business to be forced out?</p> <p>Q18: We do not understand the reference to wanting the development to "activate ground floor uses along Norwood Road", as these are already activated. The only unused space is next to Knowles' bar which Knowles intends to use, although this plan was held up by the pandemic. So what is meant by this statement?</p> <p>There also seems to be a contrast between the statement that "development should maximise local employment opportunities and help address skills deficits in the local population" and the idea that all Norwood Road frontages need to be rebuilt with the risk to local business, as outlined above.</p> <p>Q19: Why is there an emphasis on having 50% of uses as shops? West Norwood nowadays is a successful town centre partly because it is already moving post-retail with many service businesses.</p>	<p>Following the consultation on the Draft Site Allocations Development Plan Document, the boundary for Site 18 has been modified to exclude part of the businesses along Norwood Road. As a result, Snowe House, Thanet House, and the associated retail and commercial units at ground floor level, including Knowles of Norwood, have been removed from the Site 18 allocation. Similarly, those retail and commercial units at ground floor level of 348 to 362 Norwood Road, including Iceland, have been excluded. The unit currently occupied by B&Q remains part of the Site 18 allocation. The quantum of commercial/community floorspace proposed as part of the SADPD Proposed Submission Version allows for the reprovision of B&Q, whose current size is estimated to be 1,867 sqm. However, opportunities for reprovision and relocation of specific retail units will need to be further explored at planning application stage, when a more concrete proposal is put forward.</p> <p>Maintaining the predominant retail function of the primary shopping areas in major and district centres is seen as a way of supporting the vitality and viability of the Lambeth's hierarchy of major, district and local centres, as indicated in policy ED7A of the Local Plan. Local Plan policy PN7 states shopping uses in West Norwood/Tulse Hill district centre will be safeguarded and encouraged, making sure that within the primary shopping area all ground floor units are in active frontage uses. A restriction of uses ensuring that at least 50 per cent of units are shops is also introduced by the same policy. This restriction in the context of the Site 18 allocation only affects the part of the revised site area that falls within the primary shopping area (i.e., ground floor units facing the high street between 300 and 346 Norwood Road).</p>

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				<p>The remaining 50 per cent of units within the primary shopping area could be occupied by any use of those considered main town centre uses as defined by the London Plan, including leisure, commercial and community uses such as:</p> <ul style="list-style-type: none"> - leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres and bingo halls) - offices; and - arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). <p>These and other community uses are also compatible with the areas of the Site 18 allocation that fall outside the primary shopping area.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Site Allocation Policy	<p>We agree with the need to capitalise on the opportunity for workspace for creative businesses to enhance the growing cluster of artists and makers in West Norwood and Tulse Hill (and we look forward to the long-awaited Norwood High St Creative Business Cluster SPD). But would the new workspace be affordable? Not all creative businesses are digital. The need among local artists and makers is for cheap workspace. We understand some of this workspace off Norwood High Street is currently being lost to redevelopment. Artists cannot afford new build unless the Affordable Workspace Policy is specifically applied – giving reduced rents for 15 years.</p> <p>Q20: How can we ensure that artists turned out of old buildings and warehousing where they paid low rents will be able to move into the new premises provided?</p> <p>We are concerned that the whole SADPD vision seems to be built on an assumption that the area does not have thriving businesses or jobs and that redevelopment would bring employment to Norwood while encouraging the growth of the creative sector when the evidence locally is that development on this scale may well kill existing businesses including artists' studios</p>	<p>London Plan policy E3 defines affordable workspace as a workspace that is provided at rents maintained below the market rate for a specific social, cultural, or economic development purpose. This includes i) sectors that have social value such as charities, voluntary and community organisations or social enterprises, ii) sectors with cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace, iii) disadvantaged groups starting up in any sector, iv) activities that support educational outcomes through connections to schools, colleges or higher education, or v) start-up and early-stage businesses or regeneration.</p> <p>Policy ED2 of the Local Plan outlines the requirements for the uplift of affordable workspace in three locations: i) Waterloo/Southbank and Vauxhall, ii) Oval, Kennington and Clapham, and iii) the Brixton Creative Enterprise Zone (CEZ). Although Tulse Hill and West Norwood are excluded from this policy, part B 1) of the London Plan policy E3 states that consideration should be given to the need for affordable workspace where there is affordable workspace on-site currently, or has been at any time since 1 December 2017, except where it is demonstrated that the affordable workspace has been provided on a temporary basis pending redevelopment of the site.</p> <p>Planning obligations defined at planning application stage along with Section 106 agreements will be used to secure any affordable workspace in any site or part of a site where it can be demonstrated that there is affordable workspace on-site currently, or has been at any time since 1 December 2017.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Site Allocation Policy	<p>Transport movement and public realm</p> <p>To have most servicing from a road running north-south through the site seems sensible, but not if the road links Lansdowne Hill and York Hill as this would create a rat run.</p> <p>Q21: How would you control the through route to prevent rat-running?</p>	<p>The revised vision included as part of the SADPD Proposed Submission Version clarifies service vehicles are expected to access off Lansdowne Hill and York Hill roads rather than along a trafficked route running north-south across the site. It is worth pointing out that the indicative approach Option 2 shown in the Evidence document made available as part of the consultation</p>

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			Norwood Road is usually very congested at busy times of day and people will cut through an alternative route if they can.	of the Draft SADPD indicates two loop service routes connecting Lansdowne Hill with Norwood Road and York Hill with Norwood Road respectively. Option 2 also indicates a pedestrian link between the two service loops that would be managed to grant access to service vehicles when required.
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Site Allocation Policy	<p>Neighbour relationships</p> <p>Q22: How can a scheme of this bulk and height be “designed to cause no unacceptable impacts on existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise pollution”?</p> <p>The 12-storey tower would loom over the east side of York Hill estate including the exercise area.</p> <p>The only way to achieve the stated aim above is to reduce building heights to a level that local people and residents on York Hill estate, Lansdowne Hill and York Hill and surrounding streets would find acceptable and involve residents as much as possible in the design of the site.</p>	<p>An indicative massing representing the quantum of development (150 and 170 self-contained residential units and 3,000 and 4,000 sqm GIA of commercial/community floorspace) proposed in the SADPD Proposed Submission Version has been tested by a team of specialists. The results are set out in the Daylight and Sunlight Report.</p> <p>In terms of daylight and sunlight impact to neighbouring properties, the team has identified little or no change in daylight to the vast majority of neighbouring properties surrounding the site. Where change in Vertical Sky Component (VSC) was noted, the retained VSC levels were considered good and in keeping with the surrounding area. Therefore, the massing was considered appropriate for the context.</p> <p>The Daylight and Sunlight Report confirms there will be little overshadowing of neighbouring amenity areas, with the exception of Thanet House’s rear gardens, which would see their sunlight availability noticeably reduced.</p> <p>Matters such as noise pollution and overlooking will be material planning considerations should planning applications come forward for the site it future.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Site Allocation Policy	<p>The six-week consultation period has produced over 300 comments on Commonplace, but many residents still do not know about the consultation, including those living in Snowe House and Thanet House which are part of the site.</p> <p>We would strongly urge planners to extend the consultation on this site and include face to face consultation.</p>	<p>The length of the consultation process and its methodology were agreed by Cabinet as part of the Consultation and Engagement Plan for the Regulation 18 consultation of the Draft Site Allocations Development Plan Document, approved on 13 December 2021. This Consultation and Engagement Plan was consistent with both the council’s Statement of Community Involvement 2020 and with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>A full report on the Regulation 18 consultation will be published alongside the SADPD Proposed Submission Version. The report explains in detail the methods the council used to raise awareness about the consultation and to encourage people to respond. The primary method used was Commonplace, the digital consultation platform used by the Council. Supplementary methods included engagement with ward councillors, local MPs, Area Meetings with representatives from community groups and organisations based in neighbourhoods with a site in the SADPD, presentations, and workshops with young people.</p> <p>Ward councillors were engaged in meetings on 8, 9 and 16 December 2021 held virtually following government guidance on the COVID-19 pandemic. Local MPs were briefed on 21 January and 1 February 2022. Both ward</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
				councillors and local MPs were invited to join Area Meetings. The Area Meeting for West Norwood was held virtually on 24 January 2022 following government guidance on the COVID-19 pandemic. Ward councillors, local MPs, as well as representatives from community groups and local organisations were provided with the information necessary to support residents in accessing the consultation material and encouraged to disseminate information about the consultation to the wider community. Council's own publicity and dissemination methods included i) notifications by email to over 2,000 contacts, including the statutory, specific and general consultation bodies required by the regulations, but also community stakeholders, ii) publications on social media platforms such as Twitter, Facebook, Instagram, LinkedIn and Nextdoor, iii) a blog post on Love Lambeth, iv) online newsletters and bulletins, v) physical copies of the draft SADPD displayed in public libraries, and vi) a dedicated website. The council also notified up to 1,1141 groups through Integrate, a directory of voluntary, community and social enterprise sector organisations that operate in the borough.
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Site Allocation Policy	<p>Sustainability</p> <p>Tall towers are not sustainable. They need more concrete and cause a higher city heat effect. How much will climate have changed in 2050? A concrete podium as proposed in Option 1 would reduce the drainage capability of the site at a time when most local authorities are discouraging concreting. Could "green" concrete be specified for the site? Or could it be developed without the podium? Why is there no mention of Passivhaus or district heating systems or generating electricity locally?</p>	<p>Construction methods are not discussed as part of the Draft Site Allocations Development Plan Document or the subsequent SADPD Proposed Submission Version. Any detailed proposal submitted as part of a planning application will be considered against the Development Plan at the time of submission and assessment.</p> <p>Lambeth's current Development Plan includes both the London Plan, adopted in March 2021, and the Lambeth's Local Plan, adopted in September 2021. Once adopted, the Site Allocations Development Plan Document will also form part of the local Development Plan. Although the current Development Plan is not prescriptive regarding construction methods, any development should meet the net zero carbon requirements set in London Plan Policy SI2, and Local Plan Policies EN3 and EN4. London Plan policy and guidance on Whole Life-Cycle Carbon Assessment should be followed.</p> <p>Significant levels of greening are expected to be provided throughout new areas of public realm, including the new public space. As recommended in London Plan Policy G5 an Urban Greening Factor (UGF) of at least 0.4 should be met for developments that are predominantly residential while a UGF of at least 0.3 should be met for predominately commercial developments. A Biodiversity Net Gain of at least 10% will also be expected.</p>
Cllrs Meldrum, Pickard and	R0945	Evidence	<p>Evidence</p> <p>"Evidence" is something of a misnomer in our view. It says the section is intended to aid our understanding of the "design-led approach". It says the indicative approach to massing and height "has been developed</p>	<p>The main purpose of the Evidence documents is to explain the design-led process that led to the proposed indicative massing put forward for each of the sites included in the Site Allocations Development Plan Document Proposed Submission Version. The analysis of the existing and compatible</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Winifred (Labour)			<p>based on a detailed analysis of the site and its context with its opportunities and constraints.” But there is little analysis of the site in the report apart from a series of photographs compared with some misleading computer models to make the height of the buildings – in particular, the 12-storey tower – look less over-bearing than they would be in reality.</p> <p>There are also some minor errors such as the description of Royal Circus as an “open space”, which is in fact a private garden, and a photograph of the snooker club which was in Waylett Place but has now been demolished and replaced with the modern flats shown in another photograph.</p>	<p>uses, when applied to the resulting indicative massing, informs the approximate land use quantum put forward in the policy text for each of the sites.</p> <p>As indicated in Part 1 of the Evidence document for Site 18, the design-led approach includes an assessment of the site and its context that summarises the history of the site, its character, building heights and uses present on and around the site, heritage assets and designated views relevant to the site, access and servicing routes, and an assessment of the public realm and the relevant planning context. Based on this assessment, a list of key design principles was outlined and, as a result of applying those design principles, two indicative massing and height options were put forward.</p> <p>These two options were tested through Townscape and Visual Impact Assessments (TVIA) considering 16 views. For each of these views, the assessment compares the view prior to any development having taken place on site with the same view after each of the two options for development are implemented. The computer model of West Norwood used for these simulations was extracted from VU.CITY, a highly accurate 3D model used by decision-makers across London and other cities in the UK to view building designs in their context and analyse their impact on the surrounding townscape. The use of VU.CITY in carrying out TVIAs has become common practice across the built environment industry, and it is seen as the most reliable source of 3D data by local authorities, planners, architects and developers.</p> <p>The effect of each of the two options considered on the relevant heritage assets was also assessed. In accordance with best practice, there has been no presumption that change within the setting of heritage assets is automatically considered harmful. Instead, each asset and the impact of development have been assessed in accordance to the significance of the asset, which has been outlined under the first column of the table under 5.5 of the Evidence document.</p> <p>All efforts will be made in order to avoid minor errors such as the ones you point out from making their way into future reports shared with the public.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Evidence	<p>“Optimisation” seems to mean cramming in as many flats as planners feel they can get away with by building upwards to a height which would appear incongruous in West Norwood and not in keeping with the current building heights as has been Lambeth’s stated aim in the past. This is maximising the use of the space but is not necessarily the optimum (ie the best) approach. The best approach is a matter of opinion.</p> <p>As expressed in the London Plan, para 3.3: “The optimum capacity for a site does not mean the maximum capacity. It may be that a lower</p>	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted.</p> <p>West Norwood is located between two train stations, West Norwood and Tulse Hill stations, and along a road heavily serviced by bus routes connecting the area to central London. As a result, West Norwood is rated</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>density development ... is the optimum development for the site." While the plan gives gipsy and traveller sites as an example, the statement is not confined to such sites.</p> <p>Comprehensive development seems to mean designing it as a single scheme although elsewhere the SADPD talks about a phased approach. Local people have told us they would prefer it to be developed using a phased approach and a mix of architecture so that we are not presented with a set of uniform boxes. It needs to be and appear as town centres usually are: an evolving and varied landscape of different appearance, although we agree with maintaining key design principles, including respecting heritage assets, improving pedestrian's experience and improving permeability to enable shops and cafes to be serviced. The phased approach will also avoid destroying existing business and residential communities so the y can move into a building completed in a previous phase</p> <p>We disagree that the design principles stated in the SADPD are met by the proposals.</p>	<p>PTAL 6a, the second highest accessibility score in London. This is seen as an opportunity to promote higher density development in line with Policy D3 of the London Plan.</p> <p>As recognised in Lambeth's Local Plan 2020-2035, although higher density does not necessarily imply higher rise, taller buildings are one form of higher density development that can be appropriate for some uses and in some locations, subject to excellent design, protection of strategic views, good public transport accessibility and consideration of the impact on the surrounding area.</p> <p>The massing put forward as part of the Draft Site Allocations Development Plan Document and the subsequent SADPD Proposed Submission Version is a hypothetical massing, which includes indicative footprints and heights for notional buildings. This hypothetical massing allows officers to assess the quantum of development proposed for the site in relation to strategic views and impact on the surrounding area. This massing is therefore not prescriptive.</p> <p>The ultimate footprint and height of buildings, as well as their appearance, will be proposed by applicants as part of planning applications. These applications will be assessed in full against the Development Plan (London Plan, Lambeth Local Plan, and the Site Allocations Development Plan Document once adopted) at the time of submission.</p> <p>It is not expected the site will be developed at once. Instead, the most likely scenario is that where separate planning applications affecting specific parcels within the site are submitted independently by different applicants at different times. It is therefore expected that the site will be developed gradually allowing existing businesses and residents to adapt and a mix of architecture to come forward. The Site Allocations DPD sets the design principles and policies (to be read along those in the London Plan and the Lambeth Local Plan) that will guide the gradual development of the site.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Evidence	<p>Pedestrians may not wish to thread their way through a labyrinth of tall buildings or along a street that would become a rat-run if traffic were allowed to drive through between Lansdowne Hill and York Hill as proposed in option 2. And it is not clear why it is felt advantageous to create a pedestrian link (which would be up steps) into the York Hill estate which is easily reached by walking up Lansdowne or York Hill. Some York Hill estate residents have told us that they do not want this link as the estate suffers from a lot of low-level crime – and experienced a recent stabbing incident – which makes it undesirable for people to get in and out too easily.</p> <p>Q23: Why has this pedestrian link been included and could we discuss removing it? And what exactly do you mean by comprehensive development? Would it not be preferable and less disruptive to the local</p>	<p>The revised vision included as part of the SADPD Proposed Submission Version proposes a different indicative street layout and clarifies access for service vehicles will be off Lansdowne Hill and York Hill roads, rather than along a trafficked route across the site. The indicative pedestrian route connecting York Hill estate with the new public space with active frontages proposed at the crossing between Norwood Road and Chatsworth Way will be kept.</p> <p>Other stepped pedestrian links with York Hill estate are included as part of the re-development proposal for 6 Lansdowne Hill, also known as the Laundry (planning application 19/02840/FUL), which was granted permission on 13 March 2020 and is now under construction.</p> <p>These links are seen as an opportunity to reduce crime. Higher pedestrian connectivity and increased footfall translate into better natural surveillance,</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			economy to consider developing the town centre in a phased approach with a mix of architects and design styles?	which along clear sight lines and appropriate lighting, are some of the measures the London Plan Policy D3 (paragraph 3.3.14) enumerates as ways to design out crime.
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Evidence	<p>On the options, there seems little difference between them except a through-route on option 2.</p> <p>However, in Option 1 you state that the street layout “allows for a variety of ground floor unit sizes with residential accommodation on podiums above”. We are opposed to the use of podiums as they cover too much ground in concrete and mean that greening has to be in pots rather than in earth.</p> <p>Also, the drawings used to illustrate the options seem misleading as the buildings look lower than what is being proposed in the text.</p> <p>Q24: Could we see some more accurate drawings in which the numbers of storeys are the same as those in the text and the sizes of the proposed blocks are properly compared with surrounding buildings?</p>	<p>The two indicative approaches (Option 1 and Option 2) explored during the preparation of the Draft Site Allocations DPD were included in the Evidence document shared as part of the Regulation 18 consultation. The indicative approaches are for illustrative purposes only. Each of the parcels within the site are expected to be developed separately following the principles set out in the Site Allocation Development Plan Document once this is adopted.</p> <p>. Option 1 indicates a loop service route connecting Lansdowne Hill with Norwood Road, while Option 2 indicates two loop service routes connecting Lansdowne Hill with Norwood Road and York Hill with Norwood Road respectively. Option 2 also indicates a pedestrian link between the two service loops that would be managed to grant access to service vehicles when required.</p> <p>The two options also differ in the quantum of indicative commercial space at ground floor level. The indicative street layout put forward in Option 2 requires the two blocks to the north of the site as indicated in Option 1 to be split into two smaller blocks each. As a result, Option 2 includes two additional residential-only blocks on the northwest corner of the site and smaller commercial podiums on the northeast corner. Option 2 also replaces the commercial podium to the block south of the indicative square with an open green space at street level.</p> <p>The introduction of commercial podiums is seen as an adequate way of meeting the requirements for retail, commercial and community floorspace set in the Site Allocations DPD Proposed Submission Version. The policy wording seeks to re-provide most of the existing town centre uses on the site in order to support the viability and vitality of the district centre.</p> <p>In due course accurate drawings will be submitted by applicants as part of future planning applications. The layout and density of buildings, as well as their design, appearance and materials will be material considerations.</p>
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Evidence	Q25: On the images of various views listed in the document, we would like to ask why the view of St Luke’s from York Hill estate balconies has not been included, or the view of the tower and St Luke’s from other vantage points to the west of the centre other than the top of Devane Way?	The view of St Luke’s Estate balconies was not assessed as it is not considered to be of public value. View locations have been selected from public vantage points - especially those of heritage value. Additional views have been included in the updated evidence.
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Evidence	Q26: Could we have more accurate drawings in the images in appendix 1, since there are problems with some of them: Image 2 looking south down Norwood Road: here the buildings on the east side of the street have grown in height compared with the photograph, to match the higher buildings on the west in the foreground. And the more distant row replacing a Victorian terrace has	As indicated in previous responses, the VU.CITY model used is highly accurate and its outputs are verified. As a result, accuracy is guaranteed. It must be remembered that the indicative approach is not a planning approval. No consideration has been given in the indicative approach to architecture materials or detailing and other matters that will come forward with any future planning application.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>shrunk in height even though the new buildings would be two-to-four storeys higher. In the second drawing, the left-hand buildings have grown even further and it's not clear whether we are further forward or further back. There seems to be more street in the foreground, but the church has grown a little.</p> <p>Either way, the modelling is misleading and cannot be relied upon. Image 11 taken from the entrance to the cemetery is also misleading since the buildings on the left seem equal in height to those on the right. In fact, they would be one to three storeys higher.</p> <p>We also disagree that there is no harm to some of the views shown, in particular:</p> <p>Image 7 showing the tower intruding on the setting of listed monuments in the cemetery and</p> <p>Image 9 from Norwood High Street which shows clearly just how incongruous the tower block would be in its low-rise town centre setting.</p>	<p>Appendix 1 of the Evidence document for Site 18 includes the detailed analysis of each of the views and summarises the findings. For the two views mentioned, it is found that the indicative approaches cause no harm:</p> <ul style="list-style-type: none"> - TVIA image 7: Although the tallest parts of both proposals are seen behind the dome of the Longsdon mausoleum, the effect in the view is fleeting. Given that the road approaching the mausoleum is curved, the two forms (the dome and the top parts of the proposed buildings) will separate as the viewer proceeds along the road. The presence of mature trees and the distance between the dome and the indicative buildings proposed means the latter will not be eye-catching or unduly discordant. - TVIA image 9: Although the tallest element of the indicative proposal is visible from this point, this element is considered to provide a visual termination at the end of the vista and to announce the heart of the town centre. Locally distinct materials should be carefully selected in order to ensure the massing integrates well into the townscape.
Cllrs Meldrum, Pickard and Winifred (Labour)	R0945	Other	<p>Our Conclusion</p> <p>There may well have been some hard work put in by individuals in the planning department, but the overall impression from the Site 18 section of the SADPD is that it has been rushed out to ensure it beats the deadline of purdah for the May 2022 elections. There are some misleading images, two options which barely differ and a focus on maximising housing without any clarity as to how much extra council rent housing would be gained. There is a lot of opinion presented as evidence.</p> <p>The six-week consultation allowed is pitiful for such a major set of proposals. There has been no attempt to hold a public meeting or drop-in for residents as requested by councillors and the only in-person consultation directly with any of the residents was an afternoon with six young people from the Old Library Youth Centre who were asked by consultants for their ideas on space for play and recreation and how Norwood Road could be improved.</p> <p>There has been no Lambeth Talk as specified in the 13 December Cabinet report. The communication has been very bland, eg Love Lambeth post has a photo of the town hall and no mention of any of the 14 sites in the SADDP.</p> <p>An online meeting was held early on with representatives of four local groups (Norwood Forum, NAG, Norwood Planning Assembly and BID). After that it was assumed that these groups would do all the consultation needed within what was by then a four-week period. Despite the minimal promotion of the consultation by the Planning Department, the two West Norwood sites have more comments on Commonplace's online consultation than all other 12 SADPD sites put</p>	<p>Officers trust all the points raised by this representation, including quality of the documents consulted on, and length and nature of the consultation process have been covered in previous responses. These responses, along with responses to other representations, will be included in the Regulation 18 Consultation Report, which is required to be made publicly available along with the Site Allocation DPD Proposed Submission Version before being submitted to the Secretary of State for inspection.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>together</p> <p>It is inappropriate for a diverse borough like Lambeth to limit such consultation to an online process inaccessible to many residents including those with protected characteristics under Equality legislation. According to the timetable, there is one more consultation after the responses have been considered by the planning department. But we are assured that this second consultation will focus on technical issues such as whether the scheme complies with the London Plan and will not be an opportunity for full involvement by residents in the development of these ideas.</p> <p>It is not surprising that local people are angry. What they want is a chance to put forward their own alternative in a proper master-planning exercise with extensive citizen engagement. We suggest that this is what should happen, with Sites 18 and 19 pulled from the SADPD process.</p>	
Individual	R0955	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0959	Vision	I am not happy about it at all. I live on the estate directly behind the proposed development. While our blocks of council flats remain damp and neglected, we will suffer months of disruption from the demolition of the current building and building works for the new build, only to be left with our flats over looked and over shadowed by another shiny new build. The pathways do not appeal to me either because our estate will then become a car park for those wishing to use the high street to shop making it even more difficult for residents to park (which is already a problem) not to mention it becoming a rat run for antisocial behaviour. From the plans I've seen, it doesn't look like "affordable housing" either. Looks more like 1-2 bed luxury apartments.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0959	Vision	Not happy. Does no one spare a thought for the residents of York hill estate where the blocks are neglected, flat roofs cause damp in properties and now we will be over shadowed by these buildings?	Please refer to the general response to representations made by individuals and businesses.
Individual	R0959	Other	<p>I am a resident of the York Hill Estate, West Norwood. I also have children at Hitherfield Primary school so would be affected by both sites although primarily, site 18 as it is directly in front of where we live!</p> <p>I speak on behalf of the residents of Wakeling House, Easton house who I have been in contact with about these proposals.</p> <p>None of us support the development at site 18 and 19.</p> <p>We demand that site 18 & 19 are removed from the consultation and that you engage with the local community to develop alternative plans.</p> <p>We have to live here throughout the demolition, the construction long</p>	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			after the the developers have gone. It is not fair that this massive project is being considered without a thought for our well being.	
Individual	R0989	Vision	Totally inappropriate to put such a large, tall development on this plot. It will rip down a large chunk of the centre of West Norwood, taking our history with it. You should stick to the LBL 2021 Local Plan and stick to the 'south of the South Circular policy'. This is being snuck through and you shouldn't hide behind things like 'affordably housing' as reasearch shows this isn't true, 'affordable' is totally subjective and this will NOT benefit local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0989	Other	I have lived in West Norwood for 8 years. I love this area and hope my [redacted] daughter will grow up here. But I don't want her to grow up somewhere where the centre of her community is a soulless wind tunnel and and area crammed with huge buildings totally out of keeping with the surrounding area, devoid of original businesses as all the locals have been driven out. Proposals for Site18 and Site19 should be taken out from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1000	Vision	Completely hideous, will ruin the character of the area and create misery for people on surrounding roads and estate.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1000	Other	I am writing to object to Sites 18 and 19 in the Lambeth draft Site Allocation Development Plan Document. Site 18 will demolish the homes of more than 80 families and all of the more than 25 existing retail and other businesses between Lansdowne Hill and York Hill. Many people will permanently lose their livelihoods. This is absolutely horrendous. Like many local residents, I support the demand for: <ul style="list-style-type: none"> • Genuine consultation in developing a carefully considered plan - to date, i do not believe this has happened. • Investment and regeneration in West Norwood and Tulse Hill - keeping the character of our neighbourhood. • More homes, particularly for local families - not luxury flats. • Thriving local businesses • A retained and ever more vibrant local community 	Please refer to the general response to representations made by individuals and businesses.
Individual	R1016	Site Allocation Policy	This seems to represent a huge increase in residential property for the area, of a type that's not particularly in keeping with the rest of the area. I am not convinced that there is room or the right infrastructure locally to support the proposed development.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1016	Other	I am a West Norwood resident and I demand that the proposals for site 18 and site 19 are removed from this consultation and new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1054	Other	I live in West Norwood and want to see the proposals for sites 18 and 19 removed from the consultation and replaced with plans developed alongside the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1068	Vision	Height of proposed building not ideal.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1068	Vision Map	Worries about height of buildings are real, but otherwise great to have high street improvements and get rid of unappealing petrol station and massive warehouse. Look at what streatham hill has done and how it changed since the old bowling / cinema conversion with m&s and Starbucks coming in. That's what we need here too to attract cooler businesses and more engaged, younger families that will love and live the neighborhood vs just sleeping here.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1068	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1079	General	<p>You are removing the B&Q car park and it is not clear how this lost overall town centre parking area facility will be taken into account, either directly or as a knock on impact.</p> <p>Broadly, this current B&Q parking area supports a limited parking for a wide range of local businesses as well as B&Q. Parking areas of this size (or bigger), in a Town Centre of this size of West Norwood, are becoming more essential for use by car clubs, e-charging points and other sustainable transport users. Also larger cycles and tricycles (typically used by families and for cycle transporting of goods) need larger parking areas for parking that are not appropriate on footways for larger number of such larger size of cycles.</p> <p>Having a limited mixed use parking area is vital for Site 18 has not been properly considered. Many more would use more sustainable travel methods to visit and use West Norwood for shopping if more appropriate and safe parking was provided. The location is also on A215 SRN, that will always be busy as used by pass through visitors on this London Strategic road network link. Loosing most of the B&Q parking area with no alterative and improved multi-use appropriate parking facilities, local business will suffer from reduced customer access and it will put more stain on residential streets not designed for such range of town centre parking.</p> <p>It is vital that such substantial overall housing intensification has appropriate and accessible transport facilities. Yet Tulse Hill station has no step free access from the footway, and neither between platforms (for use as a rail transport hub via West Norwood station). For this scale of housing development it will be essential that developers ensure by condition contributions go towards providing full accessible transport at</p>	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Tulse Hill rail station. Otherwise, this substation proposed scale of development will be grossly unfair on those who are most vulnerable and disabled. Unless these accessible transport matters are appropriacy added into a revised plan, then both schemes [Sites 18 and 19] cannot be supported.	
Individual	R1114	Vision Map	The scale of this proposed development is totally out of character for the area. High rise buildings would destroy the character of the high street.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1114	Other	I am a resident of West Norwood and have lived here for twenty years. The proposals for Site 18 and Site 19 are completely inappropriate for the area. They must be removed and new plans developed in conjunction with the local community. Such high rise development will ruin what is a small high street in a suburban residential area. There is overwhelming opposition from local residents and this must not be ignored.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1130	Vision	I live on Canterbury Grove - a quiet street in the heart of West Norwood. We moved to this area a few years ago when we realised that the changes in Brixton are pushing residents out. Everything about this plan, which is extremely short on details, suggests that Lambeth is not interested in the impact of development on the local residents or the landscape. While there's always room for improvement of the high street, there arent enough green spaces or cycling lanes, and a desperate need for real affordable housing, this plan is not the right solution. As worrying at the plan itself is the potential impact of the works on our quality of life and the right to enjoy our homes for a very long period, making this area unbearable to live in. I am a resident of West Norwood and I demand that the proposals for site18 and site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R0942	Other	Not everyone is going to agree to everything, and that is fine, but stop trying to get things through the back door when being upfront and clear is going to create a more acceptable and cohesive environment from the get go. Listen to people and these processes will go much more smoothly. I wholeheartedly reject the existing proposal on the grounds that it hasn't been consulted on correctly or professionally. Start again, create designs and understanding for everyone concerned with the vision and go from there.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1131	Evidence	I've viewed the proposals for site 18 and 19 and I have a few comments. Initially I don't understand why the proposals are buried so deep on the .commonplace.is sites. Why are the actual proposals under	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>evidence? It took me a while to find any relevant information. The proposal text seems to be quite fluffy in comparison to the schemes buried under evidence.</p> <p>It's not clear are these council built schemes or developer schemes? I didn't seem to find anything in relation to numbers of units, social, affordable, private. If these are developer led, are these put out to tender?</p> <p>Looking at both schemes, it seems that the tall buildings proposed in the centre of both schemes of 18 and 19 are far too tall. They would change the character of the area considerably, this would increase the urbanisation dramatically and having just lived through Covid and being shut indoors, shouldn't we be considering greener leafy more open spaces, public squares and humanscale buildings. Not tall dystopian Gotham city esque.</p>	
Individual	R1131	Other	There are concerns that both would have to be built with significant fire control measures. Given Grenfell and Southwark's Lakanal House fires, it seems foolish to build more high rises, creating risks that need to be mitigated against and maintained throughout the life of the building. Councils don't have a good reputation for their maintenance programs on buildings.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1131	Other	I have concerns about the increase in traffic with the increased housing density. Norwood High Street seems to be jammed 16 hours a day, I live nearby and often visit. There doesn't seem to be any mitigation against this, or proposals for whether the sites will be car-free or provide car parking spaces. During the construction of site 18, this would lead to a year or two of increased traffic problems and associated pollution.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1131	Other	With regards to Scheme 18. It seems odd for the council to knock down perfectly good buildings given their pledge to be Net Zero Carbon. How will all this new embedded carbon be offset? Will the carbon released and wasted during demolition be captured?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1131	Evidence	Also regards to Site 18, views, the view from the Devanne Way Playground over London, is something to be treasured and this blocks a large part of that view.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1131	Other	I'm all for development, but these proposals are too high density and tall, ruining the character of the area. Thus as a resident of West Norwood, I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. Kind regards,	Please refer to the general response to representations made by individuals and businesses.
Individual	R1172	Other	I strongly object to the proposed developments at site 18 and site 19. These sites should be removed from the site allocation plan document.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>West Norwood is an area of greenery, street level and low-rise housing with wide stretching views from various vantage points. These are some of the reasons why West Norwood is a desirable place to live.</p> <p>West Norwood is a suburban neighbourhood differing in character to the north of the borough,[I have lived for many years in both].</p> <p>Now Lambeth Council in their arrogance propose two incongruous developments in Knollys Yard[site 19] and on the Broadway [site 18]. What do they think they are doing? The disruption, noise and the movement of heavy lorries will cause a blight on the neighbourhood for years but this does not seem to be a consideration for councillors at Lambeth.</p>	
Individual	R1172	Other	<p>It is stated that site 19 is to be a car free development, great, no car parking facilities need to be provided on site, instead car owners/users and there will be many will be parking in the neighbouring streets. I have been told by councillors that the solution to this is to bring in more CPZs [already overwhelmingly rejected by Knollys Road residents], all this will do is to push people to park in further neighbouring streets which have none. This was proven in streets nearer Norwood Road where since the introduction of CPZs, there are very few cars parked, instead residents park elsewhere.</p> <p>You may wish to call people who don't want this blight on their neighbourhood nimbys and I have heard that certain councillors have said as much but this attempted denigration will not deter us from objecting to a totally outlandish proposal foisted on us by an unsympathetic council who think they can do what they like with people's neighbourhoods.</p> <p>Has anyone from Lambeth been to West Norwood? What do they think when they look at the map: "Here's a place where we can put in some high-density high-rise housing never mind what the local people think and whether it will add to or detract from the character of the surrounding area"?</p> <p>I and my family have lived in West Norwood for over 25 years and have seen the place grow and improve in feel over the years with many new businesses and facilities. These developments will be completely out of place and will radically change forever the character of the place.</p> <p>It should be noted that Knollys Yard provides local employment when available space for industrial use has become hard to find in the Borough.</p> <p>While not opposed to the building of residential housing, the height of the proposed buildings and the number of dwellings packed in is not suitable for this site.</p> <p>I support the local groups opposed to these developments in their</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			present form. Why is it that I have only heard of this through these groups and by word of mouth, I have heard nothing from Lambeth Council? Be careful Lambeth, there are a lot of [ex?] Labour voters here.	
Individual	R1181	Vision Map	<p>There is no Visions! This needs to be removed from consultation and new plans developed with the local community. 1,000's of local residents are appalled by your lack of imagination to develop such a great community.</p> <p>I live in Tulse Hill and object to the proposals for Site18 and Site19 as stated at: https://lambethsadpdsite19.commonplace.is/ and https://lambethsadpdsite18.commonplace.is They need to be removed from this consultation and new plans developed with the local community. 1,000's of local residents are appalled by your lack of imagination to develop such a great community.</p> <ul style="list-style-type: none"> • There has been no adequate local public consultation on these plans. • We work & live here and your development proposals overall would harm local communities and businesses. • These buildings are too tall and contravene Lambeth's own planning rules. We don't want tower blocks, they are too high and ugly, • It would overwhelm the local infrastructure, increase traffic congestion as well as damaging the environment through the destruction of mature tree and uprooting of established eco systems. These do nothing to help our 'climate emergency.' • There is no vision of a viable town centre for the area. • There is no genuine social housing which people on low incomes could afford. <p>Please rethink these awful proposals and engage with resident and businesses.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1181	Vision	Very poor planning, no consideration for us who live and work here. Needs to be scrapped and started again. Consult us who live here!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1181	Evidence	We don't want our businesses & homes knocked down.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1181	Context	You have not mentioned how many men, women & children would lose their homes?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1182	Sustainability Appraisal	<p>I am a resident of West Norwood and I request that the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.</p> <p>I was born in the 1960s and grew up in West Norwood. I am now in my 50s and living here again after a 10-year absence. The area has</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>changed. It is more pleasant to be here now and the character of the neighbourhood has evolved. It is clear that many people, those who have moved here as well as those born here, have found a real sense of "community".</p> <p>I oppose very strongly the proposed overwhelming plans for the area (ref the Council's "Site 18" and "Site 19") that would change its nature completely and forever.</p> <p>As a comparison, view the difference between Kings Avenue and Clarence Avenue, adjoining streets in Clapham Park SW4. People now identify Clarence Avenue as being "that road with all the tower blocks". By contrast, Kings Avenue has new buildings that are low rise in keeping with the others that line it either side.</p> <p>Changing an area from "suburban" to "urban" density requires sensitivity and must be done in partnership with the local community that has to accommodate any changes.</p> <p>Please ensure that SITE 18 and SITE 19 are removed from the global consultation and considered in partnership with all the local groups that are so anxious to consult constructively with the Council's planners.</p>	
Individual	R1182	Vision	<p>The Lambeth Local Plan includes the following points in its mission statement:</p> <p>E. Promoting community cohesion and safe, liveable, inclusive neighbourhoods</p> <p>F. Creating and maintaining attractive, distinctive places</p> <p>West Norwood is already appreciated by its residents, retailers and visitors as an "attractive, distinctive place". We wish it to remain attractive and distinctive by not allowing high-rise tower blocks to penetrate and overwhelm its character, opening the floodgates for similar out-of-keeping buildings throughout the area. Public discussions pre-dating 2016 brought about a vision for West Norwood and Tulse Hill that would not permit this sort of massive development and we would like to maintain this discipline and request the Council's planners' assistance in this endeavour.</p> <p>We would provide similar feedback regarding the proposed 22-storey monstrosity at Knolly's Yard that would dominate the local skyline for miles around.</p> <p>Please respond positively to the feelings of the local community that lives and works here and plan in partnership with residents and their local planning groups.</p> <p>Thank you.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1192	Vision Map	<p>I am a resident of West Norwood and I insist that the proposals for Site18 and Site19 are removed from consultation and new plans developed with the local community that are suited and proportionate to</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>the local amenities and environment.</p> <p>I don't really understand why there is just one very tall building (a minimum of 10 metres but typically 25 metres taller than nearby buildings) in the site boundary when there seems to be lots of white space to either side of that building that remains unused. This seems a very poor design - tall buildings have poor social and psychosocial outcomes and so why not use the whole site space to build homes that would be more conducive to a positive community and would benefit the mental health of the residents as well as be better suited to the neighbourhood (ie not towering over neighbouring residences).</p>	
Individual	R1194	Vision	<p>Section 5 of the Draft SADPD refers to a "new town centre public space" that is echoed in the summary vision statement. "New" does not necessarily mean better. The vision statement is wholly lacking in substance. There is no description as to what a future West Norwood could represent to the community and to the people who call it home. High architectural quality sounds good - but what metrics will be used to determine that it delivers something better than West Norwood in its current state.</p> <p>You need to make the case for change - and there IS one to be made. Doing nothing in West Norwood is to leave things the way they are, with under-utilised assets and missed opportunities. But Councillors need to take the community with them - and WE need to be properly involved. We could start by jointly agreeing a Vision Statement to frame a revised plan for Site 18</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1194	Vision Map	<p>The "natural" gradient measured in terms of AOD height across Site 18 ranges from 57 to 71 metres at its northern perimeter to 55 to 68 metres across the southern perimeter. It is difficult therefore, to see the justification for a high rise block with an AOD height of 81 metres within Site 18.</p> <p>The Draft SADPD states .. "The rest of the site is suitable for buildings of around 15m (57m AOD) to 21m (69m AOD), to create a coherent roofscape rising from the perimeter street frontages to a single highest point within the site". This statement is predicated on the assumption that a "single high point" is acceptable in the first place.</p> <p>To create a single building with a height that over towers building in its immediate vicinity by about 33% requires specific justification. What is the case for this exceptionally tall unit?</p> <p>Draft Lambeth SADPD labels Norwood Road as a "healthy" route. Given the poor air quality recorded along this route it is difficult to see how this designation is consistent with the present reality. What impact will Site 18 development have on active/planned steps to reduce levels of pollution?</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1194	Sustainability Appraisal	The statement that development of Site 18 will be "car-free" made in the Sustainability Appraisal is conspicuous by its absence from the Transport, Public Realm elements of the description set out elsewhere in the SADPD. This is troubling - car ownership is highly probable and it is difficult to see how an influx of additional vehicles can be managed. Some indication of creative options ought to form an adjunct to plans for Site 18	Please refer to the general response to representations made by individuals and businesses.
Individual	R1194	Site Allocation Policy	<p>Transport, movement and public realm - proposals are limited to the confines of Site 18 on the west side of Norwood Road (A215). It is likely that traffic flows along this route will become more problematic over time. At peak times they already constitute serious difficulties for public transport. Removal of servicing for retail outlets may be achievable through Site 18 proposals, but only to the west side on Norwood Road. Additional measures will be needed in order to deal with similar issues on the opposite side.</p> <p>Traffic management initiatives to improve access to/from Norwood Road could be usefully introduced, for example by prohibiting turning right (heading north) out of Chatsworth / Chestnut etc and no right turns by northbound traffic into those roads.</p> <p>Making better use of these entry/exit points could be achieved through urban design concepts of the type presently being discussed as part of the Lancaster Avenue consultation. Site 18 developers could be asked to undertake any necessary works to improve traffic management proposals of this sort.</p> <p>There is little point in describing Norwood Road as being part of a Healthy Road Network when air quality is so poor. Unless positive steps to remedy this environmental hazard are taken it can only deteriorate.</p> <p>As part of a response to this challenge, any proposals for Site 18 MUST indicate how car ownership will be accommodated given the large number of housing units. As it is commuters using West Norwood Station already decant their vehicles in streets to the east of Norwood Road as well as in streets running into Knightshill up to the bus depot.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1194	Vision	<p>What is a "fifteen minute neighbourhood" ?</p> <p>The statement makes no mention of traffic and its management through West Norwood. Given that COP-26 has just concluded, it is really surprising that no specific reference is made to the environmental or public health impacts.</p> <p>There is no doubting the need to reconfigure West Norwood and its shop frontage along Norwood Road but this vision statement lacks, well "vision". There is nothing to excite.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1194	Other	I live in West Norwood and have read through the documents describing proposals for Site 18 to the west of Norwood Road.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>I am deeply worried about the lack of any proper engagement with the local community who have been unpleasantly surprised by the sudden emergence of these proposals without notice to those of us who live and work in the area.</p> <p>It would reflect well on Elected Members and the Council as a whole if the Site 18 proposals were removed from the current process.</p> <p>A revised scheme could then be co-developed by the local community working in collaboration with the Local Authority</p> <p>Please remove these proposals</p>	
Individual	R1204	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1205	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1206	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community Thank you!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1209	Other	<p>I write to object to the proposals for sites 18 and 19 in the consultation regarding Tulse Hill and West Norwood. I am a local resident, living in West Norwood.</p> <p>There has been inadequate public consultation regarding these sites which indeed include an 11 storey building which breaks your own planning rules. These proposed buildings will destroy the character of the local area and will result in the destruction of wildlife as well as leading to a loss of light and amenity for local residents. The proposed sites would also increase pressure on local services as well as increasing traffic and therefore pollution in the local area.</p> <p>For these reasons I strongly object to the proposals for sites 18 and 19 and consider that these should be removed, not least as they contravene your own planning rules.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1210	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1211	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community To this email: sadpd@lambeth.go	Please refer to the general response to representations made by individuals and businesses.
Individual	R1212	Vision	This does not seem to have been consulted on with local people	Please refer to the general response to representations made by individuals and businesses.
Individual	R1212	Site Allocation Policy	This is document does not set out how points will be addressed merely what should be addressed. This proposal lacks depth and detail to be able to establish any positive effect it might have on the area. The	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			proposed tall building would be an eye-sore and not in keeping with the local area at all	
Individual	R1212	Other	<p>I wish to lodge an objection to the proposed plans for these two sites in West Norwood. The plans are not in keeping with the local area. These plans would put greater pressure on public transport in the area. They would force many thriving local independent businesses to close. There is also no mention how this aligns to Lambeth net zero by 2030 target.</p> <p>This significant amount of housing would increase traffic in the local area and have a determined impact on air quality in the area, which is already polluted and has significant traffic issues.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1214	Other	<p>This plan is absolutely vile, with complete disregard for the local community. It seems to have been drawn up by someone with absolutely no understanding of our town centre, or what this community values.</p> <p>The plan describes destruction of an incredible number of valued, local, independent businesses. The plan notes that West Norwood currently provides a 15-minute neighbourhood, which is indeed true, but neglects the fact that this is only possible because of the businesses that it proposes to destroy. There is certainly no way that almost all of the independent businesses that are currently occupying that side of the high street would be able to return after an extended period of demolition and construction, nor would likely be able to afford the rents in new-build commercial space. I can currently get everything I need on our high street, thanks to regularly visiting: butchers, our local pub, multiple food outlets, bakery, hardware store and major DIY outlet - all of which are proposed to be closed and replaced by higher-bidding tenants. The loss of the B&Q site would only cause local communities to have to resort to further and increased car/van usage - the absolute opposite to what we should be working to. West Norwood's strength, both economically and socially, is its independent businesses - this plan only harms them, and will remove exactly the thing that I value most about this area. I think whoever drew up this plan would be surprised at the closeness of this diverse community.</p> <p>It should be noted that the majority of these businesses are run by and/or cater to the BAME communities in the area. That this plan would amount to a programme of council-sanctioned gentrification and ethnic cleansing of West Norwood that should strike shame into hearts of all of Lambeth. This is not in line with the carefully generated local plan, would not benefit the local community and would harm Lambeth as a whole. I honestly cannot see any positive to the plan as it is.</p> <p>I have, of course, only spoken about the high-street frontage side of this</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			plan, not the remainder of the site behind. As this plan is being looked at as a whole, I cannot endorse any part of it. However, I would welcome actual engagement with the community to fact-find what may be appropriate use for the rear site, as I am aware that this land could be utilised better.	
Individual	R1216	Other	I am a resident of West Norwood and I demand the proposals for site 18 and 19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1217	Other	<p>I would like to express my concern towards the site 18 and 19 plans to build high rise buildings along West Norwood high street and Tulse Hill. As a local resident who is proud of how West Norwood has created a burgeoning community that not only cherishes the existing community but has also become a desirable place for many families that have moved here as it hasn't been taken over by developers. The low level characteristics of West Norwood we want to cherish and high rise living is proven to not create the positive living being claimed. West Norwood is a great example of how old and new works symbiotically to create a new modern London. This is due to the amazing work of the Norwood action group protecting mindless development to the detriment of local residence. No one wants to prevent positive development and growth but nothing about the plans meet either. The fact that these plans have occurred without the usual consultancy is very distressing and against all the promises we are made by Lambeth council.</p> <p>These plans will single handedly kill our community and take away some of the cherished local shops that serve our community and replacing existing shops with corporate retail brands that are the ones that can only afford what we know will be increased rent. These are shops that have been developed to meet our local needs and carefully curated for all types of residents.</p> <p>More importantly it's displacing and destroying peoples existing housing to be replaced with undesirable high rise living. There is so much evidence to show that it shatters families lives being moved to high rise and makes no sense you're taking away decent housing away to create something worse. No one wants to have another Grenville tower!</p> <p>There is no consideration of this development meeting or working with the net zero target for 2030.</p> <p>Please please remove site 18 and site 19 from the plans or at least do us the decency of consulting with local groups before including so they can see the dire impact it will provide. Do this with humanity and decency. We've been through enough fighting against Southwark metals and the pandemic and just need to be involved to help grow our community and not see it destroyed.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1218	Other	I am a resident of West Norwood and I strongly object to the proposals for Sites 18 & 19 of the West Norwood Development, and I demand that they be removed immediately until further consultation with the stakeholders of the local community is carried out!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1219	Other	<p>I'm writing you as a resident of West Norwood for over 7 years. It might not look as long period, but me and my husband moved here, when I was pregnant with my son. He is born here.</p> <p>We love the community, the history, the parks, the local sites. I think that the new sites are clashing with the architecture with hight and design. Even the purpose of it is questionable.</p> <p>We are not commenting on detailed planning applications so issues of construction traffic, business disruption compensation, etc, whilst relevant in the longer term, are not quite so important now. The exception to this is the proposed new access to Site 19. The dubious financial viability of Site 19 also comes with the risk that developers could argue away the affordable housing allocation. We can be emotional – talk about the substantial change this will bring to our neighbourhood and our way of life – the change to the heart of our community. We don't want to see a swath of 'developer architecture', but an ambitious incremental development with the community as an equal partner in an exemplary approach to town centre redesign. We believe that incremental development (within an outline Master Plan) is the only way forward as it enables the development to reflect change in the way we live our lives. Nothing in these proposals reflects the changes that Covid-19 has brought to every aspect of our lives. We expect world class urban design that recognises West Norwood as an existing viable, successful, neighbourhood with an enviable strong sense of community. We welcome investment that sees the community as a partner. Our 'high street' of independent retailers, with low vacancy rates, has proven resilience backed up by statistics. Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development. We recognise the desperate need for new, mixed accommodation for local people at affordable rents – but not at any cost. We want to see local homes for local people – designed in collaboration with local people. We expect ambitious environmental credentials for any development. We have a strong identity that blends independent business with residential accommodation in heart of our community. We have reached this enviable position organically and nothing in these development proposals puts sufficient value on the sense of place that already exists. These proposals do not provide adequate provision for our existing 'dirty' businesses - e.g. scaffolding companies and car repair</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			workshops. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood. B&Q is an anchor store in West Norwood, another reason we can call ourselves a 15min Neighbourhood, we can see no specific proposals to retain this important business along with its essential parking - that is also an important asset for the rest of the shopping area. Your trying to reshape such a unique place as West Norwood and erase the history.	
Individual	R1220	Other	I write to object to the proposals for sites 18 and 19 in the consultation regarding Tulse Hill and West Norwood. I am a local resident, living in West Norwood. There has been inadequate public consultation regarding these sites which indeed include an 11 storey building which breaks your own planning rules. These proposed buildings will destroy the character of the local area and will result in the destruction of wildlife as well as leading to a loss of light and amenity for local residents. The proposed sites would also increase pressure on local services as well as increasing traffic and therefore pollution in the local area. For these reasons I strongly object to the proposals for sites 18 and 19 and consider that these should be removed, not least as they contravene your own planning rules.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1222	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1224	Other	As a local resident to this proposed development, I object to this moving forward. There has been no information proactively provided to the local community and I can not see that a comprehensive assessment has been conducted on the impact regarding additional traffic, pollution, pressure on local services including schools, healthcare, public transportation or the environmental impact.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1225	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1226	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1228	Other	I disapprove of the plans for the reconstruction of West Norwood proposing site 18 and 19 and want them to be removed from the development of West Norwood's local community. There has been inadequate consultation with the local community, it destroys the character of West Norwood, it threatens local community and	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			businesses, there is no mention of the Net-Zero target for 2030 and no creative vision for the town centre for 2050 and beyond.	
Individual	R1229	Other	<p>I am a resident of West Norwood and I ask that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>Whilst I am not opposed to development it's imperative that the community is consulted with to find a solution that meets the needs of all the community and creates an on overall benefit to the local residents and businesses of West Norwood.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1230	Other	<p>I have many concerns about the sites 18 and 19 in the current consultation:</p> <p>The scale of these developments will have a large impact on the community that must be considered in a full consultation.</p> <p>The proposed tower blocks, particularly at site 19, are far higher than any other in the local area and will negatively affect the skyline with an impact on many homes</p> <p>The significant increase in housing will put an additional burden on local services (eg GPs, schools) which should be fully considered</p> <p>Regarding site 18, the impact on existing independent local businesses needs to be considered</p> <p>Please let me know how to participate further in the consultation.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1231	Other	<p>We are West Norwood residents of 35 and 41 years' standing and are writing to demand the removal of Site 18 and Site 19 from the SAPDP Consultation. These proposed developments would have a huge impact on our neighbourhood and require far more community engagement than has been undertaken or provided for.</p> <p>We absolutely support the provision of more and better housing for Lambeth residents alongside other forms of local regeneration. But this can only be achieved successfully by collaboration with the local community, using the considerable local capacity and expertise that exists in our area and from which previous proposals have benefitted. This is especially vital when the proposals affecting West Norwood and Tulse Hill would have an impact far greater than any of the proposals affecting other town centres in the SAPDP.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1232	Other	<p>I object to these developments on the following grounds:</p> <p>Destroys character of local area</p> <p>Threatens local homes and businesses</p> <p>No consideration to Lambeth net zero target for 2030</p> <p>No vision for town Center fit for 2050</p> <p>Site not viable for affordable housing</p> <p>Increased pressure on local services</p> <p>Less parking, increased traffic and reduced air quality</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Destruction of wildlife and protected trees Loss of light, amenity and visual skyline I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	
Individual	R1233	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1234	Other	I write to object to the proposed development in West Norwood between York Hill and Lansdowne Hill. - site 18/19. I currently live on Dalmore Road, but also grew up in West Norwood, and my mother has lived here continuously since 1976. This proposed development is a massive one, which will be extraordinarily high, and out of keeping with the surrounding buildings. That's going to have all kinds of environmental and social impact, and the consultation with local residents has been minimal - certainly for such a huge development. It's unclear that affordable housing is going to be guaranteed, or that the new building will be done in accordance with the most ambitious of sustainable criteria (surely a must in 2022). And local businesses - already under pressure from the internet, Covid consequences, and increasing NI - need to be consulted fully here. There is a real danger that this development is going to transform West Norwood for the worse. Development is certainly needed - there's a lot of wasted space and land that could be used in this area. But such a huge development really needs more thought and consultation.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1235	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1257	Vision	It's as if Lambeth Council is living in a dream and that as long as words like 'affordable housing' and 'flexible workspace' are used, you can carry on with carrying on. We are living in a climate emergency!! All building needs to stop. Housing can be created by refurbishing buildings that already stand. We don't need more workspace - flexible or otherwise. There has not been enough public consultation - we needed to see real plans. I am very disturbed by your ignorance - you ignore the state of the planet, you ignore your responsibilities and - I just get the impression that as long as you can keep going with your plans, nothing else will matter. I object. Strongly!!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1266	Vision Map	Inappropriately large building, much larger than anything at present in the area. No need to demolish large swathes of the high street. Will not help any housing issues	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	Noted.
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and</p>	In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.</p>	<p>Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO2e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon</p>	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG</p>

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> ● Cement <p>Cement is a very high CO2e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO2e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO2e output. - 4-5% of the worldwide total of CO2e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution ● Steel Steel also has a significant impact on the environment: - It is CO2e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement: ● Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit "off-gas" toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. ● Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It 	<p>requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world's riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber.	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> • Overheating, caused by the proliferate use of glass and a high concentration of inhabitants • Increasing carbon energy required to offset this through mechanical ventilation • Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The "urban heat island effect" • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise 'skyscraper' buildings also increase the densification of housing. You still need green spaces between them, while the services -</p>	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			lifts, stairs, water, wastewater, power - must be installed in a narrow block.	assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.
Lambeth Green Councillors	R1321	General	<p>6. Summary Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council's commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations: 1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p>	Noted. Please refer to officer responses to previous points made as part of this representation.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p> <p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	
Individual	R1330	Vision Map	Like it, it's a great design. Please ensure that any loading and taxi drop-offs take place off the High Street, so as not to delay buses through the area. Currently the petrol station & DIY shop are always causing blockages to northbound buses.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1330	Vision	Love it! A West Norwood that's fit for the future. Homes, life, modern retail/business space. Can't happen soon enough!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1331	Site Allocation Policy	Build lots of housing!! This is a great site to bring forward development. The area has seen very little new housing delivered in a long time. New homes are very much needed.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1331	Site Allocation Policy	This site is longing for redevelopment. A mixed-use and mixed-tenure scheme would rejuvenate this part of the High Street. In order for the site to be brought forward has the council thought about the use of CPO powers in order to bring forward sites in a more coherent way?	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1332	Evidence	<p>Do you have any comments about the Evidence for Site 18?</p> <p>1.0 Introduction</p> <p>The evidence and recommendations proposed for Site 18 to justify the 'design-led optimisation of the site' is a missed opportunity to ensure a new development of this scale and significance is developed with the correct balance between commercial opportunity, community cohesion and excellence in urban design and architecture. This site, located close to the historic centre of West Norwood's, is unique in the borough and should be afforded a coherent vision and approach for its future legacy.</p> <p>The design proposals the evidence purports to understand have not been clearly presented. Based on the 'Vision' statement and 'Site Allocation Policy' the proposed design makes an unconvincing assessment of existing infrastructure and historic context or argument for justification of use, scale and massing, impact on amenity and townscape. The recommendations proposed appear to water down the standard set in the Local Plan and omit key issues of use, community engagement and sustainability.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Evidence	<p>Para 2.24: Routes, Access, Servicing and public realm</p> <ul style="list-style-type: none"> Existing servicing, commercial and retail access is far more complex as suggested. There is currently a one way vehicular access to B&Q roof level carpark and around Waylett Place. Waylett Place car park provides valuable public realm, currently used for Covid testing. This sits on the site of the former Thomas Place indicated on the 1870's map. Therefore this current public open space forms an important part of the historical grain of the area. No justification is given for the loss of this public realm. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Evidence	<p>Para 3.1: Key Principals</p> <p>The following items should be added as 'site -specific design drivers': -</p> <ul style="list-style-type: none"> All relevant Heritage Assets including the setting of the St. Lukes church, West Norwood Cemetery, West Norwood and Lancaster Avenue Conservation Areas. The pedestrian experience within the site only along Norwood Road should be clearly identified. The retention of existing businesses and active encouragement for new local start-up businesses with the provision of affordable workspace and commercial units. Community engagement. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Evidence	<p>Para 4.2-4.3 Plans</p> <ul style="list-style-type: none"> The 'conventional' commercial blocks at ground level provide deep plan sizable units suitable for larger retail operators requiring anchor stores. This type of retail unit does not seem suitable set against the 	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>current collapse of conventional retailing on the high street. This could lead to large unused commercial spaces undermining passive surveillance, safety and vibrancy in the area.</p> <ul style="list-style-type: none"> • The scale of the block plans appear suitable for larger vehicular traffic. <p>As the development is residential led more attention could be placed on pedestrian access and priority. The encouragement of a more creative approach to the types of dwellings and businesses could help generate a more innovative design approach.</p> <p>Para 4.4 Building Heights and Massing</p> <ul style="list-style-type: none"> • The 12 storey tower in the centre of the site overshadows the proposed residential amenity space directly to the north of the tower. <p>Para 4.6 Plans</p> <ul style="list-style-type: none"> • The introduction of a secondary circulation route is preferable in Option 2. • Alternative layout proposals should be encouraged by the policy to explore the incorporation of pedestrianised routes and a finer urban grain. 	
Individual	R1332	Evidence	<p>4.8 Daylight and Sunlight</p> <p>The use of BRE guidelines in the site layout and planning is already established within the Local Plan.</p> <p>There is no evidence provided that the proposed layouts have been assessed under 'Site layout planning for daylight and sunlight: a guide to good practice (BR209)'. This document discourages courtyards or L shaped blocks where the vertical sky components drop rapidly along the façade towards the internal corners. The introduction of the larger tower massing overshadows the residential amenity space to the north.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Evidence	<p>Townscape and Visual Impact Assessment (TVIA) Summary</p> <p>5.1 Principal Objectives</p> <ul style="list-style-type: none"> • The impact of the proposed design is unacceptable in relation to the view composition and appreciation. • The proposed townscape change is discordant and unduly dominant in its context • There is significant harm to the urban settings of the heritage assets. <p>5.3 The indicative approach is considered to be the optimum level of development for the site. It is not clear what this is based on, have there been alternative study's produced for the site for comparison?</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Evidence	<p>5.4 Effect on Heritage Assets</p> <p>Image 4- Lambeth Local view and Panorama view (iv) from Knights Hill</p> <ul style="list-style-type: none"> • Map not displayed • Both the local view toward towards St. Luke's church and the wider panorama of the city are protected in the council's guidance although only the cone view of the church is referenced in the assessment of 	Please refer to the general response to representations made by individuals and businesses.

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>both options. No mention is made of the relationship between the landmark tower of St. Luke's in the middle ground and the distant tall building cluster. The panorama guidance, which is not restricted by the viewing cone states: -</p> <p>'The Development between St Luke's Church and the city cluster should not diminish the viewer's ability to appreciate the contrast between the two.'</p> <p>Therefore any introduction of a tall building between the two would need to be carefully assessed, this does not appear to have been the case.</p>	
Individual	R1332	Evidence	<p>Images 5-14: all clearly indicate the visual impact of the taller 12 storey building. It is subjective to conclude the massing is beneficial to the townscape. It could be argued the taller massing is detrimental and harmful to the setting of the heritage assets including: St. Lukes Church, West Norwood Cemetery; West Norwood and Lancaster Avenue Conservation Areas.</p> <ul style="list-style-type: none"> • Image 10: Why does the building need to terminate views towards it the 12 storey building when Norwood Road is the main vista not building behind the street frontage? • Why does the tall building announce the heart of the town centre when that is located elsewhere, it appears to propose to create a new commercial/ residential hub and draw attention to itself. • Image 11: The tall building is visible well above the predominate massing and therefore could be argued that it impacted harmfully on the setting of West Norwood Conservation Area. • Image 12: 'the tall building is clearly noticeable but not discordant with the breadth of Chatsworth Road' The change of scale is clearly significant from this view, it is not clear why pathfinding is important to the town centre as the building massing increase here in any case signifying the shopping parade? • Image 14: 'The highest part of the indicative approach is glimpsed from the backdrop' it would be useful to compare this against a lower massing to assess which option is more suited to the setting. • Image 15: The image depicts the view of a full development, has the impact of the tall building been assessed relative to the existing buildings on the corner of York Hill and Norwood Road being retained? • Image 16: The tall building 'announces the presence of the town centre at the end of the vista', is this appropriate within the Lancaster Road Conservation Area, the proposed massing could be interpreted as harmful to the heritage asset. • (Image 9 label incorrect) <p>6.0 Conclusion Recommendations:</p>	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1332	Other	Comments and additional recommendations added: - Built Heritage: • The settings of heritage assets should not be harmed. Especially St Luke's Church and West Norwood Cemetery, West Norwood and Lancaster Avenue Conservation Areas.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Other	Height: • The centre of the site can accommodate a degree of height – c36m if well (typo) that height is well integrated with the locality by stepping the other heights within the site down towards the site perimeter. A parapet line to Norwood Road with subordinate 'roof top' type forms above will assist with such integration. • The proposed massing for the development should be well integrated with the existing context and topography. The current Townscape and Visual Impact Assessment has not demonstrated the suitability of the layout or taller buildings. It could be detrimental to any new proposal brought forward if the Local plan is compromised by this assessment.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Other	Design quality: • High quality design using brick (the prevailing local material) will help integration with the locality • Why is this definition necessary wouldn't the local plan already guarantee high quality design and materials? • To guarantee consistency with such a large development wouldn't a design led masterplan including a considered approach to materials and quality help build on the requirements of the local plan? • There could be specific guidance on other design issues relevant such as shop fronts, street furniture, balconies, roof materials, paving materials, landscaping, signage... ?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Other	Connectivity: • A new street network which better integrates with the wider locality and allows for in-site servicing. • Connecting to the housing estate on York Hill has not been addressed in sufficient detail. The topography of the site is one of its greatest features. Proposals should be encouraged to enhance this inherent feature in a creative and innovative way to enhance connectivity. Public realm: • Widened footways to Norwood Road, a new open space off Norwood Road present significant opportunities to improve the quality of the visitor experience to West Norwood Town Centre. • Re-establishment of historic square? • Establishment of different public realm scales with smaller scale pedestrian routes off busier main routes. • Topography: Creative response to sloping site and connection with	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			York Hill housing estate. Enhanced environment: • Public realm improvements and new routes present opportunities for tree lined streets and other urban greening.	
Individual	R1332	Other	Activation and natural surveillance: • Active ground floor frontages and good overlooking to all public routes. • Option 1 creates problematic relationship a ground level with active surveillance with long stretches of servicing areas. Use: • Maintenance and enhancement of retail use, introduction of affordable work space. Provision of residential use.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Site Allocation Policy	Sustainability: • The scale of the development offers the opportunity to integrate sustainable forms of construction, transport, renewable energy, and retention of embodied energy where appropriate. Developers should be encouraged to explore these issues within the site allocation. In conclusion the evidence presented does not adequately justify the site allocations design proposal and potentially restricts the potential of a new development by leading a developer into following prescriptive the proposed design. The Townscape and Visual Impact Assessment is highly subjective and prematurely assesses an undeveloped design proposal. The site recommendations suggested could be improved with more clarity of what a new development might bring to the area. The principal of the site allocation is very ambitious it is of critical importance that the aspirations of the community and best design process be sought for this important urban development.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Context	Planning Context: The following policy documents and professional planning studies have been carried out relative to the development site. No reference is made of these documents which represent important planning thinking specific to the site. • West Norwood Town Centre Master Plan 2009 • A Plan for West Norwood and Tulse Hill: Community Evidence Base Report 2016 • West Norwood and Tulse Hill: A Manual for Delivery 2017 • Norwood Design Support NPA 2019 The Manual for Delivery represents the most comprehensive study of the area and how the site could be brought forward for redevelopment. An extensive public consultation was carried out with definitive recommendations for how the site could be brought forward for development. The Draft Site Allocation should incorporate reference to this document with evidence to support the proposed changes. The suggestion 'provide a strong active frontage on the high street' is	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			not supported with evidence. The current shop frontage at ground level is fully let and operating with a variety of businesses. No reference is made of the importance of Chatsworth Way in the context description. Chatsworth Way is highlighted as an important axis and view point in the proposal although it is not clear why? No mention is made of the state of existing wayfinding, legibility and accessibility for pedestrians cyclists and vehicles on site. Parking capacity is not referenced.	
Individual	R1332	Context Map	The context map does not fairly represent the complexities of planning issues relating to the site. Items missing include: - No land ownership is indicated. No existing businesses are referenced. Current land uses are not shown. Current planning consents are not indicated. No site photographs are referenced on the map. Building names are not indicated. Orientation relative to neighbouring areas or destinations are not identified. Topography is not shown. Existing landscaping and trees are not indicated. No existing densities are indicated. Scale of current buildings not represented. Key views not indicated. Existing parking not identified. Existing pedestrian routes not shown. Existing vehicular routes not identified.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Vision	The proposed vision does not represent high architectural quality. The proposed 12 storey tower is not justified and at odds with the local plan relative to the panorama view from Knight's Hill, harmful impact on heritage assets of West Norwood and Lancaster Avenue Conservation Areas. The vision does not draw on evidence and conclusions presented in A Manual of Delivery 2017. The local community have not been consulted in accordance with Lambeth's Statement of Community Involvement 2020.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1332	Vision Map	The relationship with existing buildings on site has not been assessed or acknowledged in the map. Phasing of the development has not been addressed in the vision map. The proposed 12 storey building is not appropriate or justified. Aspects to local heritage assets or local panorama view not indicated. Sub-division and grain to the built form is not clarified. Type of access to York Hill estate is not explained.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Landscaping across the site is not adequately represented. Private amenity space is not indicated.	
Individual	R1332	Site Allocation Policy	<p>There is no justification or evidence of the proposed increase of residential units from 280 in 'A Manual for Delivery 2017' to up to 470.</p> <p>There is a lack of understanding of how workspace can be accommodated within a ground floor podium arrangement with lack of natural daylight and sunlight which may be better suited at first floor and above.</p> <p>There is no evidence to demonstrate retail demand at a time when retail development are in retreat within the borough.</p> <p>Affordable work space should be considered within the area.</p> <p>The proposed 12 storey tower harms West Norwood and Lancaster Avenue Conservation Areas as demonstrated by the views shown.</p> <p>The taller 12 storey building impacts negatively on the townscape and is not in accordance with Image 4- Lambeth Local view and Panorama view from Knights Hill guidance.</p> <p>The proposed podium layout does not demonstrate how active street frontages will prevent unsafe streets, excessive location of servicing areas could create large frontages of uninhabited frontages.</p> <p>Pedestrian access onto the York Hill Estate which sits a storey above the Site 18 street level has not been considered in the proposals.</p> <p>There is a lack of residential amenity areas indicated at ground level minimising protection from passive surveillance.</p> <p>No suggestion has been made to utilise the communal play area on the York Hill Estate as previously proposed in A Manual for Delivery 2019.</p> <p>South facing residential amenity areas have not been maximised.</p> <p>There could be greater emphasis on conservation of energy, retention of existing structures to retain embodied carbon, and more specific landscaping requirements for the site.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1335	Vision	<p>Site 18 must be struck from the Development Plan</p> <p>Instead LBL should simply stick to 2021 Lambeth Local Plan</p> <p>Lambeth must adhere to the 'south of South Circular policy'</p> <p>Not even councillors, let alone local people, have been allowed any input into the drafting of these local proposals</p> <p>The local proposals are not 'plan led' as required by the LLP (no way is this "part of a comprehensive scheme that integrates well with the locality")</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1338	Vision Map	As already stated. I am opposed to the building heights going over 15m.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1338	Context	I am surprised to see 8 to 12 Lansdowne Hill included in the site as my understanding from the Master Plan was these old people's flats would be preserved. Also, there are good views of St Lukes Church from the York Hill estate, even though this isn't listed in the borough plan. Perhaps it should be.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1338	Vision	I don't believe that the term "high architectural quality" will produce, the kind of buildings I would like to see in the town centre. I dislike most modern architecture, cannot abide the idea of a row of shop fronts with flat roofs and five storeys in height facing the Victorian buildings across the road. I would prefer to see pitched roofs, brick, and windows matching the buildings opposite. I just know we won't get that. Also, I am adamant, y opposed to a 10 storey tower block. There should be nothing over six storeys as Norwood people, have been saying for years. Finally, I'm not sure we need another public square. That was a nice idea when site 18 was first discussed in around year 2000, before the renovation of St Lukes Gardens, the new library and the establishment of Feast. A bit irrelevant now.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1338	Site Allocation Policy	Pleased at the idea of pavement widening. But absolutely opposed to a tower block in the centre of the site. Or anywhere in the site. As the site goes steeply uphill, it should ideally be no more than four storeys, or up to 15 metres at any point, so the buildings step up from the main road. Six storeys should be the absolute maximum. I objected to the seven storeys agreed for the laundry site and don't think that should set the height for the rest of the site. Ideally, there should be more affordable housing than suggested, but I understand the issues which prevent this. Nonetheless, all existing social housing in the site should be replaced by the same amount of social housing before these calculations begin. Agree with the idea of a "varied roofscape" but feel there should be pitched roofs where possible, especially fronting Norwood Road. I feel the new public space is probably irrelevant and not needed. Concern about cars using a rear service road as a rat run, so suggest the road should not link Lansdowne Hill and York Hill. The town centre needs more parking as public transport is weak, particularly east-west where we need more hopper bus routes and greater frequency of what exists. Many people still need to drive in to the town centre from areas round about as the access via public transport or walking or cycling is too difficult for them.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1339	Vision Map	The proposed development is much too high for Norwood High Street.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1341	Vision	The plan is out of keeping with the rest of the area, predominantly due to the design and height of the buildings. This high density housing is not what is needed.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1342	Vision	The last thing we need in West Norwood is more food outlets. Neither do we want an 11 storey tower block. Most of West Norwood is low rise, and that's how we want to keep it. The existing shops on the West side of Norwood Road provide valuable shopping opportunities and should be left alone. As for making it cycling friendly, have we not, as taxpayers, spent enough on pandering to the cycling fraternity?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1343	Vision	Does not appear to be any provision for the apartment block already on Waylett Place above Iceland. The wasteland absolutely needs to be developed but this looks to be encroaching completely across our properties	Please refer to the general response to representations made by individuals and businesses.
Individual	R1344	Vision	The destruction of the historic terrace fronting Norwood Road parallel to Waylett Place is not a sustainable idea. Renovation would be much less disruptive and probably more economical.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1344	Site Allocation Policy	The ground floor of 348-352 (even) Norwood Road is an Iceland shop. In 2016, the parts of the building above and behind the shop were developed as nine flats. The existing structure is three-storeys high with the second floor set back from the Norwood Road frontage. The draft proposals for Site 18 show a 5-storey building on the site. To make way for this, a large amount of almost-new housing (which was built to Lambeth's own planning requirements) would be destroyed. The new block would be out of proportion to buildings on the other side of Norwood Road. This proposal should be dropped as it would be a waste of existing housing resources and create an oppressive canyon-like feel to Norwood Road. The Site Allocation Policy should be amended to say that "No development should involve the demolition of housing constructed or converted with planning permission to residential use since 1 January 2000".	Please refer to the general response to representations made by individuals and businesses.
Individual	R1345	Vision	I see nothing wrong with what is there already	Please refer to the general response to representations made by individuals and businesses.
Individual	R1347	Sustainability Appraisal	Long term dedicated space for deliveries to the development to be from reallocated private car storage space in adjoining roads. Car storage encourages car use	Please refer to the general response to representations made by individuals and businesses.
Individual	R1379	Vision	I don't understand the plan or vision, it's not at all clear, there are not architecture drawings etc displaying a clear visual. At the moment, the site seems multifaceted and to be serving the community well with retail space, affordable housing, church, pub and petrol station. West Norwood high street is also all a certain height, the plan seems to want to increase this with no reference to preserving the character of the area. It's hard to supportive of the change without more information available.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1382	Vision	Completely amazing, bring it on. The area has been a wreck & the petrol station a stinky cesspool in the middle of town!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1386	Vision	New public space will likely turn out to be a litter strewn ugly unused square with seating for the homeless and occasional drunk (and maybe even skateboarders) and dog poo. The shopping frontage is likely to increase the number of vacant shops on the high street and pulling down the older shops to replace with new boxes will add to the deterioration of the high street visually. The housing gain will help - hopefully - some of those on the council waiting list.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1386	Vision	THE VISION SHOULD INCLUDE PULLING DOWN YORK ESTATE WHICH IS AN EYE SORE AND REPLACING IT WITH LOW LEVEL HOUSING. THE PROPOSED NEW CONSTRUCTION ALONG NORWOOD ROAD WILL BE UGLY AND INAPPROPRIATE TO WHAT REMAINS OF THE EDWARDIAN HIGH STREET. HIGH ARCHITECTURAL QUALITY IS UNLIKELY FROM LAMBETH AND THIS PROJECT WILL NOT ENHANCE THE APPEARANCE OF THE HIGH STREET. THE STUFF ABOUT A GREENER MORE PEOPLE FRIENDLY ENVIRONMENT IS THE USUAL SMOKE SCREEN FOR REDEVELOPMENT. HOWEVER IT MAKES SENSE TO REDEVELOP THE AREA BEHIND THE HIGH STREET WHILE LEAVING THE EXISTING EDWARDIAN BUILDINGS AND BUILDING EDWARDIAN STYLE SHOPS TO THE SAME HEIGHT WITH FLATS ABOVE IN THE GAPS TO MATCH THE ORIGINAL AND RESTORE THE ORIGINAL FEEL OF THE HIGH STREET. I assume this is really all about the Housing waiting list and need for housing gain.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1397	Vision	Very worried about the quality of the buildings that will be built as there are no guidelines. It will have a negative impact on street parking for local residents forcing them to get a CPZ. And no plan for schools for all the new families.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1403	Vision	High rise flats do not a town centre make. Disastrous idea.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1409	Vision	As a summary description of a vision, this seems pretty positive and I applaud the intention to make good mixed use of an area that includes some badly neglected land adjacent to a town centre. The problem comes when the wholly misplaced vertical scale of the intention becomes apparent in the absurdly high-rise block foreseen for the site. I am also uneasy about what "renewal" of the Norwood Road frontage would mean in practice. I would not want to see familiar businesses disappear, even in the lengthy timespan planned.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1409	Context	I agree that within area of the site "Current buildings do not optimise the potential of the site" but that does not mean all of them should be allowed to be demolished. The oldest of them are historic premises,	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			whose frontages should be retained in some way. (However, I would be fascinated if any demolition resulted in Archaeological discoveries related to the Levehurst Medieval Manor House)	
Individual	R1409	Evidence	I disagree that the highest part of the indicative approach is, eg, "not so large as to be dominant or distracting in the wider townscape" in certain views. It very much would be, and should never be built to such a height in a town centre that has escaped the blight of such unsuitable high-rise building until now.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1409	Site Allocation Policy	Much of this sounds potentially good, but I entirely disagree with the statement "The central part of the site is appropriate for a tall building of a general building height of 36m (81m AOD), adjacent to a new public space". This is an appalling idea, entirely out of keeping with the area. The central high-street areas of West Norwood / Tulse Hill do not have, and would not benefit from, any buildings of such an overbearing scale.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1409	Site Allocation Policy	No part of our town centre site is "appropriate for a tall building of a general building height of 36m". Please abandon this part of the plan.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1412	Vision	The high rise blocks will ruin the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1427	Site Allocation Policy	I am very very opposed to buildings of the height proposed. I think that three stories should be the maximum in this area. The density is already high for an area such as this and the policy should aim to reduce this. It is important to bear in mind the high level of pollution arising from traffic congestion which is often very acute in Norwood Road. New development should avoid the risk of exacerbating this.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1427	Vision	The Council have failed to update their housing policy following the increasing decline in population in the area most apparent in the falling numbers of primary school applications. Many temporary workers have returned home abroad and many local people are moving further out of London. This area is too densely populated with traffic congestion and should not be targeted for further residential development.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1440	Vision	I am a resident of West Norwood and the development sounds enormous, with some high rise buildings and potential for huge disruption for many years.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1443	Vision Map	Why the huge and sudden to change to our local architectural landscape? The proposed tower block is totally out of step with the historical surroundings and suburban nature of West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1444	Sustainability Appraisal	Objective 17 in the Appraisal is not met, there is no efficient use of existing facility including the existing high street buildings. Objective 7 isn't met at all either. There is no consideration to the existing character of the high street and nothing in the proposal to foster social cohesion with new and existing residents.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			This proposal should be rejected and reconsidered with the involvement of local residents.	
Individual	R1444	Vision	Please keep buildings below 5 storeys high and plenty of open and green spaces.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1444	Vision	This is rubbish! A large portion of the high street is to be destroyed! We need more housing but we need to keep the community integrated to the local area. This proposal is way too big and hasn't considered at all the integration of the scheme to the local area and West Norwood community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1447	Vision	I think the idea of having a tall building is a bad one. It is not in keeping with the air rounding area and also the high street. Mixed use development makes sense but not high rise	Please refer to the general response to representations made by individuals and businesses.
Individual	R1448	Vision	Sounds great but the height of the buildings should be in keeping with the building that surround it.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1452	Vision	New social housing is great as I have been bidding for years, but I don't think a 22 storey is necessary	Please refer to the general response to representations made by individuals and businesses.
Individual	R1453	Evidence	concentrate on getting rid of flytipping. rubbish collecting. get rid of potholes. lambeth still did not re tarmac norwood road like you said you would after water pipes. get us our trains back. guve us post. no post since dec 20. give is more buses. but no thus is not hoing to guve you big bucks. no i do not support this scheme in any way	Please refer to the general response to representations made by individuals and businesses.
Individual	R1453	Vision	this vision supports big business it is majorly disruptive and not needed. and not what our community needs.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1453	Site Allocation Policy	totally disagree. this benefits property developers only no consultation from us who live here do not agree c	Please refer to the general response to representations made by individuals and businesses.
Individual	R1453	Vision Map	why are you doing this? so some major business can make money. rather invest in the small businesses that are here. this us what we need. we already had two terrible years of disruption due to water pipes. this would go on for years. why arent you supporting the small shops that had to close during pandemic. why not help them to open. instead this horrible ugly plan. to make money and impose on us. we live here. we love it. we will say no	Please refer to the general response to representations made by individuals and businesses.
Individual	R1464	Evidence	Fairly good. However, some of the townscape views are not great where the depth of the tallest building is visible. Given the location I suspect developers will want to go higher, maybe focus on the shape of a tall building?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1464	Vision Map	Not telling you much. Why is the public space in the middle? You could open up either of the side streets and widen the distance between the development and sensitive neighbours. This area needs quieter side streets for terai cafes - a refuse from busy roads. What about levels? Do you need to maintain the street frontage? Agai, there is little break	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			from the noise of the road and some refuge may be useful - perhaps some trees? What about character? I don't think you can really go into spatial principles at this stage. Focus on uses.	
Individual	R1469	Context	"A series of unrelated plots and dead-end routes" - Sums the the area perfectly, dead-end.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1469	Vision	I support the plans - a litany of kebab shops, crap cafes and off licences, the high street is a polluted, dirty, tatty and uncared for rat run. The shops are low quality and have suffered years of neglect and there is very little in the way of aspiration when looking at the retail and residential offerings on Norwood High Street. I hope this development will finally bring West Norwood up to date with the rest of London and allow us to enjoy the regenerative benefits enjoyed by Peckham, Brixton, Crystal Palace and even Streatham. I just hope we don't end up with a big fat Aldi or Lidl in the middle of the development. That said, the development needs to be much better than some of the poorly thought out blocks that have gone up in surroundings areas - high quality exteriors (brick) and urban design is key here, along the lines of the West End Project around Tottenham Court Road. I'd also implore the council to make provision for segregated cycles lane along the high street as the road public realm is widened - it's a once in a generation chance to make this much needed move and is in line with government walking and cycling policy. I also hope the eye sore railway arches at the bottom of Auckland Hill / under the station can be regenerated soon too as they have in other areas - there's no reason West Norwood shouldn't enjoy the regenerative successes these areas have had in recent years.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1469	Context Map	The high street is really dangerous if you're cycling - please, please, put in a segregated cycle lane in - there is ample room to do so and it will transform the area if West Norwood could be more cycle friendly and connected to Brixton , Dulwich and Central London. This is a once in a generation chance to get this right.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1473	Evidence	At some point in history the council gave permission for a very beautiful cinema to be demolished and that hideous B&Q to be built. I have very little faith in the councils ability to make wise planning decisions which is not helped by stupid statements in the evidence trying to justify the construction of high rise blocks in the middle of this low rise are like this 'The tallest element of the Indicative Approach provides a visual termination at the end of the vista and announces the heart of the town centre.' Whilst there are some buildings without much architectural merit along the high street there are some older victorian buildings that could be refurbished and brought back to life rather than the whole sale	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			demolition of large chunks of our street scape to be replaced by bland new developments of flats. Looking round London these days very few new developments are still looking good after 10 or 20 years and some of the existing buildings on the site 18 are much more viable for refurbishment to look good in another 100 years than what you are proposing now.	
Individual	R1473	Vision Map	How is it possibly a good idea to stick an 81meter tall building in the middle of this low rise suburban neighbourhood. Council you need your heads examining.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1473	Vision	I think it is good to have a vision to improve the high street but it should not be an excuse for blanket large scale demolition and construction of bland new high rise flat detracting from the overall aesthetic and scale of the surroundings.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1474	Vision	I'm extremely unhappy about these plans which will destroy the much-valued community feel of the area. I absolutely oppose the proposal to change the low-rise nature of the high road for bland, ugly buildings and overcrowding. The area has a wonderful atmosphere, much of it engendered by the high street buildings that evoke the history of the area. Building upwards will completely ruin that and make West Norwood a more oppressive and less friendly place to live, obliterating the local character and replacing it with ugly modern boxes.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1475	Vision Map	Please don't go ahead with this. The buildings already there give this area character. We don't need new buildings, invest in the ones that exist! They are our heritage and WN locals will thank you.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1476	Vision	I object to this on the grounds of loss of historic amenity and unsustainable building practices. The embodied carbon of the existing buildings is just that, and any option other than reuse of existing stock will lead to an increase in embodied carbon emissions which would not be offset by operational carbon gains, which incidentally could be gains through building fabric improvement. The addition of an increased number of dwellings will put a strain on infrastructure and existing public services. There is no net benefit to placing such developments on an established and thriving high street. The plans are simply a cynical move to respond to a housing crisis that should be responded to by building new communities of human scale.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1477	Vision	Feels like I have to log on to this site every week to rail against some poorly thought through scheme that will totally change the face of West Norwood. This one no exception. There isn't the transport infrastructure for a development of this nature, and the buildings proposed are much too high. This is open season to let developers, who have a poor history, turn West Norwood high street into the next indistinguishable high rise sh*thole.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1480	Vision Map	I object to a massive 11 storey high block being plonked in the middle of suburban West Norwood. It is totally out of keeping with the area. None of the new developments should be taller than those that surround them. Once Lambeth gives permission the one 11 storey block, buildings of that height will quickly multiply and the area will turn into a disaster zone similar to Nine Elms.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1480	Evidence	The assessment says the proposed development needs to be "not be discordant" in order to pass planning. It clearly fails on those grounds. Describing the tallest building as "discreet" is laughable. Just look at TVIA IMAGE 12. The new high street side buildings will also be on a higher elevation to those on the opposite of the street. It is very visible that they will dwarf the existing architecture.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1480	Vision	The plan is exactly what people do not need. We need council housing, not more high density, high rise flats for foreign investors. We need homes, not investments. Site 18 will destroy the local community, making it an ugly place to live and take away much loved institutions such as Knowles.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1480	Vision	We do not want to lose Knowles and other local businesses, which won't be able to afford the far higher rents in this new development	Please refer to the general response to representations made by individuals and businesses.
Individual	R1507	Context Map	This is acceptable, not only for the shops that will be knocked down to make room but for us residents in York Hill estate. The disturbance from building will greatly affect our health plus we will lose the view we have. The extra people living there will mean less play space for our children which is currently only very small as it is	Please refer to the general response to representations made by individuals and businesses.
Individual	R1513	Site Allocation Policy	I live on the second floor and I'm scared me and my daughter won't be able to see the view of South London, our heritage	Please refer to the general response to representations made by individuals and businesses.
Individual	R1513	Vision	It will block York Hill estate's view of West Norwood and the sunshine that we need. I'm really worried we will only be able to see the backs of these new builds.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1513	Vision Map	You forgot to include the POPULAR children's playground in the map	Please refer to the general response to representations made by individuals and businesses.
Individual	R1516	Vision	Think it's an area that would benefit greatly from redevelopment	Please refer to the general response to representations made by individuals and businesses.
Individual	R1528	Evidence	TVIA Image 12 (page 38 of 42) seems to underestimate the visual impact of the new development on the view from Chatsworth Way at the corner of Idmiston Road. It is clearly noticeable (as stated), but would be discordant with the overall view. At present, there are residential houses either side of the street and no high rise buildings. A new high rise building where there was none before would be discordant. As to the suggestion that the trees will soften the impact, such impact is	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			likely to be minimal given that the new high rise building is right in the middle of the road. In my view on either Option 1 or 2 the townscape is harmed. This harm could be reduced or minimised by reducing the height of the high rise to a lower level.	
Individual	R1532	Vision	The specific Victorian character of West Norwood is in danger of being eroded by this and other recent planned redevelopment. Lambeth should concentrate on preserving this character with sympathetic redevelopment rather than simply bulldozing original buildings and replacing them with generic and oversized new builds.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1533	Vision	Such a shame to tear down old buildings that have been part of West Norwood for generations	Please refer to the general response to representations made by individuals and businesses.
Individual	R1534	Vision	It would ruin the character and history of the high road. This community would suffer a great loss by putting in a massive building here	Please refer to the general response to representations made by individuals and businesses.
Individual	R1535	Vision Map	I don't agree with it.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1536	Vision	I live on the York hill estate, this will block our light and our views, etc	Please refer to the general response to representations made by individuals and businesses.
Individual	R1539	Vision	West Norwood is already over crowded but has a nice vibe! The residents will fight this as we are sick of construction all the time!!!!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1540	Vision	I do not agree that new buildings would improve the town centre. West Norwood needs to keep the original Victorian buildings to retain its character. Norwood Rd is already congested so it is not a sensible idea to increase housing density right here. It would be a massive mistake to knock down the Victorian shop buildings and ruin the uniformity and character of the high road.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1541	Site Allocation Policy	Affordable housing does not exist. These will be highly priced as all the other housing schemes have been. Buildings in this area are victorian-style so max 2 floors. What you are proposing is higher than local houses and will change the landscape drastically Also not enough car park spaces for all the development	Please refer to the general response to representations made by individuals and businesses.
Individual	R1542	Vision	Agree with all these goals. Better cycling infrastructure on the high street is sorely needed.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1542	Vision Map	Space for cycling should be explicitly called out; this is a very congested part of Norwood Road and grade-separated cycling infrastructure should be part of the plans.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1542	Context	The B&Q does have some community value and care should be taken to not destroy local retail in the effort to save it. Potential to relocate further south?	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1542	Site Allocation Policy	This is all good, though the proportion of affordable housing must be maintained to maintain West Norwood's community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1544	Vision	I am very unhappy about this development. Knocking down historic buildings with so much architectural character for some modern faceless soulless blocks of buildings will remove so much of west norwoods history and destroy the nature and heritage of the area	Please refer to the general response to representations made by individuals and businesses.
Individual	R1544	Site Allocation Policy	I support development in the area of west norwood but am totally opposed to a 15 story block of flats and any developemnt which is not sympathetic to the heritage and achitecture and to allowing a developer free reign to put up whatever cost saving profit making type of building they will come up with. Futhermore I feel Lambeth has been disingenuous about what the actual shape of the development will look like	Please refer to the general response to representations made by individuals and businesses.
Individual	R1546	Vision	In the centre of the current high street which is already congested with pedestrians and traffic and other empty retail sites that could be better utilised!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1549	Site Allocation Policy	<p>I and other residents take objection to the notion that this is 'an appropriate site for a tall building of a general building height of 36m (81m AOD)' and even moreso 'Other buildings slightly exceeding the threshold definition of tall buildings in this part of the borough (25m) may be acceptable in the central part of the site.'</p> <p>There are no buildings of that nature in the vicinity and what attracts people to the area is the residential feel and small high street, with lack of high rise city-feel to the area. We want to keep it that way.</p> <p>As with all developments, the idea that 35-50% will be affordable is questionable. For the vast majority of local people here, <80% of market rates is still not genuinely affordable and not acceptable to be marketed as such. Why not think even more creatively about affordable housing by promoting CLCs and cooperatives? I ask this question somewhat facetiously, as I already know the answer - no profit in it for the council. Yet, tremendous benefits for local people. empowering them to have rights over their own property, design, build and management, whilst working together as a community.</p> <p>The idea that development of the size above will be able to comply with the requirements you have stated below is highly questionable:</p> <p>Development should also address the following principles:</p> <ul style="list-style-type: none"> • no harm to views affecting heritage assets - Views would be curtailed dramatically for all residents immediately adjascet and behind the proposed development • use brick as the principal building material to reinforce local distinctiveness - Can you not think more creatively than this about the 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			building materials used? This favours certain developers and is not the most energy efficient, sustainable and cost effective material to use. All in all, a lot more creativity, thought and desire to help the local community could be seen here, rather than seeing it as opportunities to seel off spaces to mainstream developers at the highest price.	
Individual	R1551	Vision	I am a local West Norwood resident (I live at [address redacted]) and I object to this ridiculous proposal. Site 18 and Site 19 must be struck from the Development Plan. These giant buildings are not in keeping with the area, show a lack of consideration for local bussinesses and social houses, the environment and they run against the 2021 Lambeth Local Plan. Lambeth must adhere to the 'south of South Circular policy' No local people have had a say on this! It is an outrage. Please think again. It's no use tacking on tiny 'benefits' when this is such a gross proposal hat will change West Norwood for the worse for ever.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1553	Vision	How does relate to all the previous information on the south of the south circular policy?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1555	Vision Map	This is madness and contrary to decades of commitment to KEEP DEVELOPMENT NO HIGHER THAN 4 STOREYS! The statement "no protected views" is technically correct, but that is because noone has actually tried to value these views, that benefit the thousands of residents who are able to look acrss the valley	Please refer to the general response to representations made by individuals and businesses.
Individual	R1556	Vision	While not opposed to redevelopment of the area, I am concerned about the demolition of such a large section of the high street. What would become of the local business which currently occupy these retail units and the people who live in the residential units above during what is most likely going to be a 3-5 year construction project. I am also concerned about the carbon footprint of demolishing a large area of viable housing and retail stock, surely the priority of the development should be to retain the character of the high street and reduce the carbon emissions of demolition and incorporate refurbishment of the high street retail and residential buildings while constructing new housing stock behind where disused and brownfield sites are located	Please refer to the general response to representations made by individuals and businesses.
Individual	R1557	Vision Map	The map is inaccurate. The neighbouring building heights are not correct.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1557	Vision	Totally out of proportion and local character. Not in keeping with current development plans and no local or councillor involvement pre announcement.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1558	Evidence	I disagree with evidence document's claims about the tallest building not being discordant with the overall setting.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1558	Vision Map	If redevelopment was in keeping with Lambeth local plan and with the area, the site would be useful. However, the current vision is not.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1558	Vision	Massively out of context of rest of West Norwood. This should stick to the Lambeth local plan.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1558	Site Allocation Policy	There is no mention made of the likely huge increase in traffic as a result of the huge number of flats proposed. How would the already traffic clogged West Norwood town centre cope?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1558	Sustainability Appraisal	Whilst the appraisal claims the development will be car free, how does it intend to ensure residents of the huge numbers of flats don't own cars and use spaces nearby to park/store them/park on main West Norwood High St and other access roads blocking space for those who need to drive to area to park.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1559	Vision	I am concerned that we have not been previously consulted about these proposals and that local views, including those of local Councillors, have not been taken into account. Lambeth should stick to the Lambeth Local Plan. Lambeth should not interfere with much loved community assets like Knowles of Norwood. Lambeth must adhere to the 'south of South Circular policy'. A high rise building will not fit in with the local environment and would be an eye sore so close to the high street. Efforts should be made to ensure any building are low rise and do not interfere with the locality.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1560	Vision Map	Ridiculously high and overpopulated for the area!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1561	Evidence	Please don't demolish the original Victorian buildings- they are part of the West Norwood character. We need to keep original buildings to retain a sense of history in the area not just sanitising with faceless modern blocky architecture that is taking over London and very unimaginative.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1564	Evidence	I do not agree that the proposed tallest building in the midst of surrounding tall blocks is in anyway 'discrete'	Please refer to the general response to representations made by individuals and businesses.
Individual	R1564	Site Allocation Policy	I don't see what is wrong with the buildings already there. These sound taller, bigger and with little cost provision for potential local buyers.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1564	Vision	It is a dystopian vision - that seems to contradict Lambeth's own guidelines.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1566	Vision	I absolutely do not want this in my area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1569	Site Allocation Policy	to keep building flats without having any police force in West Norwood to keep citizens safe is ludicrous	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1570	Context	A diverse range of small mixed use of sites is vital to give an area character and individuality. It seems that the intention is that all town centres should look the same! Part of the feeling of community that exists in West Norwood is created by a diversity of small shop and land uses. It seems the proposal is to destroy this and create a homogenous shop frontage that would mirror other high street "improvements" which have not been improvements at all and have led to characterless high streets with any feeling of community or individuality of an area completely destroyed.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1570	Vision	This seems to be a series of statements consisting mainly of 'planning jargon'. It contains many phrases such as "fifteen minute neighbourhood", increasing pedestrian and cyclist permeability through urban greening, an appropriate space for informal town centre activity etc. etc. In truth the vision for this site is to over develop it, leading to the loss of the unique character of west norwood which rests largely on the fact that there is very little high rise development. This has meant that the feeling of local community has been maintained. This 'vision' will completely destroy the feeling of community that currently exists in west norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1570	Evidence	Yet again more 'planning jargon'. The comment that there is no architectural merit to the range of buildings along the shopping frontage is a matter of opinion. My impression is that the only architectural merit valued by the author of the SADPD is uniformity. Again the very diversity of the architecture is what gives the area character and individuality. Yes the pavement is narrow in places and that can be difficult but to propose redevelopment of an area simply because it has narrow pavement in places is like taking a sledgehammer to crack an acorn. There must be other options. A more sensible proposal would be to 'redistribute' the use of the existing space between the two opposing shopping frontages. So for example widen the pavement outside the shop frontage where Greggs is located and reduce the pavement width on the other side therefore creating a more even distribution of wider pavement space and re routing the traffic to a more central position but still allowing a two way route for traffic and having equal width of pavement on both sides of the shopping frontage. This would seem a far more sensible approach to the problem of width of pavement being unequally distributed on different sides of a short stretch of Norwood Road.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1572	Site Allocation Policy	Sounds Great	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1577	Evidence	From this document hard to see how it improves or has any impact on the public realm. At street level, what facilities and public spaces will there be?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1577	Evidence	I object to raising the permitted building height to 36m. It is completely incongruous to the existing local area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1577	Evidence	Page 35: Is huge new blue building in the render, part of the development. If so the report cannot claim no 'massing'.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1577	Site Allocation Policy	The statements on building heights are ambiguous and need more clarification. At the moment they could be interpreted as claiming a 12 storey tower block only a few metres from Norwood Road would be acceptable. Which of course would be utterly incongruous with local area's architecture.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1577	Vision	This is a great once in a generation opportunity.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1581	Evidence	I think these documents should be made much easier to read, so that more people can engage with them	Please refer to the general response to representations made by individuals and businesses.
Individual	R1585	Vision	I think the development plans could have a positive impact on the west Norwood area	Please refer to the general response to representations made by individuals and businesses.
Individual	R1586	Vision	The worse part of this Vision is that those affected (i.e.the shops) are not aware of this.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1589	Vision	Overdevelopment proposal. This is appalling!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1590	Vision	Stop using improving the life of pedestrians as a reason for this development, there is currently no evidence To support that pedestrians are not happy with the current experience. This is a developer money making opportunity, end of. It's outrageous the type of buildings that are being proposed here will complete ruin the heritage of this site for local people.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1590	Evidence	This document provides no evidence for the justification of this development. I'm né of the key reasons stated with the doc for the proposal is to improve the experience for pedestrians, as a local resident I can confirm the pedestrian experience is just fine, ample space for all of needing to walk on the high street currently. The proposed buildings are totally out of keep with the local area, they are obstrusive and will damage the heritage of the high street. The development proposes significant increase to housing on the high street, where is the provision for schools, doctors, and public services in your plan? The tall building proposed is way too tall and will be an eye sore. This development proposal is outrageous it destroys the heritage of our high street and interrupts the lives and businesses of too many people.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1591	Vision	The Victorian architecture needs to be retained that is what makes West Norwood. I want to see the 'town centre' looking like Lordship Lane in East Dulwich, that will bring people into the area to spend money whereas a monstrosity like Croydon town centre will not.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1592	Vision	This strip of frontage is a total waste of high street at the moment, the only well-maintained shop is Wearabouts. Everything else on that whole run either looks the same as it did 20 years ago, or worse. The B&Q is awful. The texaco forecourt is an absolute mess, it should be a BP with an M&S. There didn't used to be a foul-smelling fish shop there, just a good one. The charity shop is pretty half hearted. The chicken shop seems to rebrand every 6 months. Efes isn't what it used to be. And I've given the butcher a couple of chances but the meat isn't up to scratch. So apart from Iceland and Greggs - which seem to be incredibly popular - it's just phone unlocking booths, second hand electronics and poorly stocked sweet shops and off licenses. Nothing to lose!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1595	Vision Map	Great to have safe cycling and renewed retail frontage.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1597	Vision	Seems like a sensible idea to try and better use current wasted space	Please refer to the general response to representations made by individuals and businesses.
Individual	R1599	Site Allocation Policy	The proposed high rise buildings are completely out of keeping with the character of the area and the number of flats is ridiculous. West Norwood does not have the infrastructure to cope with this many additional people. Traffic will become even more congested. Please consult the local community on what they want to see to improve the area while maintaining its character rather than turning it into a soulless high rise development.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1600	Vision	Ghastly	Please refer to the general response to representations made by individuals and businesses.
Individual	R1601	Vision	As a local Landlord, resident and former business owner this is the news I have been waiting for. West Norwood has been crying out for redevelopment. Other local areas have managed to turn around and improve to the benefit of its local community. It's West Norwood's time now!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1622	Vision	The more greenery and space for pedestrians and cyclists the better. Norwood Rd is often clogged with motor vehicles.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1623	Vision Map	An 81metre building is very upsetting to local people, and totally inappropriate for this low key residential area. Many residents to west/south of the high street are not even aware of high-rise plans as there has been no publicity re this area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1640	Evidence	Again out of keeping and the right to light has not been fully accounted for from what I can see. It will significantly change the character of West Norwood and I believe the height restrictions of buildings are	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			being broken with this development. Site 18 and Site 19 must be struck from the Development Plan Instead LBL should simply stick to 2021 Lambeth Local Plan Lambeth must adhere to the 'south of South Circular policy' Not even councillors, let alone local people, have been allowed any input into the drafting of these local proposals The local proposals are not 'plan led' as required by the LLP (no way is this "part of a comprehensive scheme that integrates well with the locality")	
Individual	R1640	Vision Map	It is not in keeping with the area - and is not even near what local residents would want from such a development in the heart of our shopping high street. Think again.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1640	Vision	Site 18 must be struck from the Development Plan Instead LBL should simply stick to 2021 Lambeth Local Plan Lambeth must adhere to the 'south of South Circular policy' Not even councillors, let alone local people, have been allowed any input into the drafting of these local proposals The local proposals are not 'plan led' as required by the LLP (no way is this "part of a comprehensive scheme that integrates well with the locality")	Please refer to the general response to representations made by individuals and businesses.
Individual	R1667	Vision	Given it already provides most of those functions, what is being added? Will existing small businesses be supported? Will it just be another major supermarket chain?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1667	Vision Map	It looks like you are intending to destroy the existing High Street. Without more detailed plans, it is ca. impossible to say more. There has also been a complete lack of communication with local residents.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1668	General	I feel a 12 storey building would be completely out of keeping with the surrounding buildings and would change the skyview and landscape in a detrimental way.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1670	Vision	This vision is out of keeping with the local area — the proposed buildings are too high and will destroy the character and heritage of the local area. It feels counterproductive to destroy current residential and retail units to build this. The high street is already congested without the additional traffic this will certainly create.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1671	Vision	It sounds good from what is written in this, slightly presumptuous sounding, paragraph. Unfortunately as a long term renter despite the good of this proposal all I think is 1. Gentrification, 2. Rent increase. Which leads ultimately to 3. Forced out of the area. So who is this community building actually for, and at what communities' expense?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1672	Vision	Dont need more blokes of flats around there it right next to a estate need council houses and shops	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1673	Vision	About time there was more housing here. The areas behind the shops are really underused. If this can help provide affordable homes and homes for young people who want to buy locally then that would be great.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1675	Evidence	<p>From what I can make out, there is no architectural detail given in the drawings to indicate sympathy for the nature of the area. All that is shown is bland high rise buildings which are not an answer to improvement of the area.</p> <p>If the amount of available dwelling places is an issue for Lambeth Council, forcing large population numbers onto blocks of flats on the Norwood High Street bereft of useful shops seems to leave residents in a bit of a desert. Where will they shop? Where can residents of the locality shop?</p> <p>What is the provision for the new residents to park their cars?</p> <p>The most upsetting matter is this scenario is the LOSS OF COMMUNITY that is surely bound to happen. Whereas the Norwood High Street is clearly in need of improvement, the proposed plan is no solution for enjoyable, community living either for the present population or for those coming in.</p> <p>Remember: COMMUNITY CANNOT BE BOUGHT. IT GROWS WHERE THERE IS CONTACT BETWEEN PEOPLE - FRIENDLY SPACES, FRIENDLY AND USEFUL SHOPS. LACK OF COMMUNITY BRINGS PROBLEMS OF ITS OWN.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1676	Vision	This proposed development is not in keeping with the surrounding area and will dramatically change the look and feel of our town centre	Please refer to the general response to representations made by individuals and businesses.
Individual	R1677	Vision	This development is totally out of character with the Victorian nature of the high street. There is need for some well-thought through development but high rise buildings are not the way forward. There is not enough local infrastructure (doctors, dentists, schools) to support this plan. It should also be communicated more transparently and the local community who live in the area should have more input on what they would like to happen to their neighbourhood. Surely it is important to remember the lessons learnt when East Enders were moved into high rise buildings. They do not foster a sense of community and isolation and loneliness were the result, together with constant vandalism. Our high street is important to us, please work with a model that will enhance it.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1683	Evidence	I have read that documents and looked at the plans and comments. While I applaud a desire to improve the buildings in West Norwood for the community, I cannot see the need or relevance of having an 11 storey block which will be a blot on the horizon. The current frontages are diverse and many run down, but their character is reflective of the	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			historic development of the area. To obliterate all appearance of the old premises and overpower the east side of the main road is, in my view, detrimental to the area.	
Individual	R1690	Evidence	The Indicative Approaches described introduce several worthwhile proposals-increasing "public realm", improving access from Norwood Road to the York Hill Estate and possibly a road linking York to Lansdowne Hills. However while attempts have been made in both IAs to ensure that the inevitable townscape change is neither discordant nor unduly dominant in its context I don't believe that with the heights and massing proposed this laudable aim has a chance of being achieved. I am strongly opposed to the apparent twelve storey building proposed adjacent to the York Hill Estate and to several six storey buildings proposed for Norwood Road. Excusing them on the grounds that they "announce the presence of the town centre", be built from "a careful selection of building materials" and that their discordant effect will be softened by tree screening is very far from convincing. Moreover we already have a town centre- St Luke's Church, the Library and Picture House and the entrance to the historic cemetery. While some additional "public realm" would be welcome, as well as accommodation and more space for Norwood Feast, please don't ruin our functioning High Street with building that are far too big- and thus discordant.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1698	Sustainability Appraisal	Any improvement for the sustainability of is good.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1698	Evidence	I have looked at the diagrams of the site. Looks good for what I can see. Good improvement to area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1698	Vision Map	I leave on York hill estates. And my building is right behind all these. The tenants have not received any information about these plans. I for have not received any.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1698	Vision	Like the idea, as long as it does not include a high raise building.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1698	Vision	Like the plan as long as the building is not high. Higher than the buildings already here. I leave right behind the site. On one of the first floor block and won't like high raising building blocking my view.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1704	Vision	Vision. What vision? This is horrifying proposal that will devastate our local community and destroy our much loved high street. Furthermore the plans are vague with no real architectural drawings or CGIs. And an 11 story high rise will be an eye sore. I strongly disagree to these vague plans. There needs to be a proper consultation with public input to come up with a better solution that benefits the local community.	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1708	Vision Map	I'm confused, are you proposing to knock down that entire parade of businesses?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1708	Sustainability Appraisal	Knocking down half the high street would completely ruin the area?! These are people's livelihoods and shops we depend on every day. High rise flats will completely ruin the feel of the area, the Victorian architecture and no doubt kill the sense of community- which is why so many of us choose to live in West Norwood / Tulse Hill. What an insane legacy to leave.... Not only that but what your plan for increasing GPs, dentists, train capacity?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1710	Site Allocation Policy	The housing potential is far too dense for the area and will put pressure on community infrastructure and services not to mention road traffic and parking in the surrounding residential areas. Such development must be self sufficient with its own health services, open spaces, additional schools. The use of high rise residential blocks will spoil the character of the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1710	Vision Map	This vision is a substantial development which will have a significant impact on area and there has been no consultation with the local community. The proposal for a 80m building will dominate and change the character of the area. There needs to be a public consultation	Please refer to the general response to representations made by individuals and businesses.
Individual	R1711	Vision	I live on Lansdowne Hill and I do not recall being invited to contribute views or learn more about the process that gave rise to this 'vision'. I fully agree there is ample scope for development, but the scrappy presentation represented on this website for a scheme whose nature and scale has the potential to be disruptive for 15 years is an offence to good governance and community relations. Where are the schematics and modelling? Where was the public exhibition? Where were the explanatory leaflets? Where is the evidence that the highly prescriptive mix suits the neighbourhood best? Does Lambeth BC have a financial interest and, if so, where is this sufficiently declared? Where is the evidence that a tower of the height suggested is appropriate, or desired by the community? The conspicuous lack of consultation might reasonably give rise to the suspicion that scrutiny and accountability are unwelcome. By all means stimulate innovative design and rethink the centre, to make better use of land and better serve the community, but do so with a collaborative, co-creating approach, not this seemingly shabby attempt to slip something through relatively unnoticed by all but those who, thankfully, keep an eye on such things.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1711	Site Allocation Policy	The following is expressed as a fact in the text above: Building heights and views; townscape "The central part of the site is appropriate for a tall building of a general building height of 36m (81m AOD), adjacent to a new public space.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			Other buildings slightly exceeding the threshold definition of tall buildings in this part of the borough (25m) may be acceptable in the central part of the site." This is an opinion presented as a fact. In whose opinion is this 'appropriate' and by what criteria?	
Individual	R1714	Vision	Appalling lack of imagination - the site could be developed to the benefit of local residents and include more housing without these oversized, ugly blocks. West Norwood has a thriving community evidenced by FEAST and other local initiatives, so if you want to improve things there are better, easier, less disruptive ways to do that.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1717	Vision	This will be the destruction of the High Street which is not acceptable. The residents have not been consulted, we want some serious environmental credential to any housing project and not some monster blocks.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1718	Site Allocation Policy	It is difficult to comment upon these proposals without seeing more detailed and accurate plans. However, it is concerning that this has been developed without consultation of residents, and will not engender trust with this key stakeholder. The policy provides lots of 'shoulds', but will any of this be delivered satisfactorily? There are deep concerns of the impact of this upon adjacent heritage assets, despite the strenuous attempts to convince otherwise.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1718	Evidence	This evidence is not independently produced and is highly partial in favour of the Council's wishes and not those of the local community nor, in the case of the serious potential for harm to heritage assets, national stakeholders such as Historic England who will be quite rightly shocked by the vandalism Lambeth Council is proposing to West Norwood. There is absolutely no need for a tower of 11 storeys in this area, other than to maximise the number of flats on the site for the benefit of developers (the council must be held to account over the quantity of affordable homes stated here against those eventually delivered). This abnormal height, added to the unprecedented demolition of an entire side of a thriving high street, is not justified by the subjective evidence supplied here. There is no legitimate evidence whatsoever to support the claims that what is proposed will cause 'no harm to setting'. The visuals supplied are inaccurate, considerably understating the impact, and even so, a number of the images are genuinely shocking in their impressions of impact on the conservation area and cemetery (TVIA 5,7,8 and 10). Lambeth council must commission an independent study of the impact upon heritage assets in consultation with English Heritage and other Conservation bodies, and most importantly, must adhere to its findings when its conclusions are not the same as the council's.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1718	Vision	This vision has been written without consultation of the local community and therefore cannot be representing what people in the area needs. Much of this site may well be suitable for redevelopment, but demolishing an entire side of a well-established high street, for the sake of widening a pavement, is like using a sledgehammer to bang in a nail, and moreover reeks of opportunism. The statements are highly subjective. For example, how can it be proven that what is proposed will be better than what currently exists? "High architectural quality" is rhetorical and subjective. Lambeth's track record raises serious concerns about the actual affordable housing that such a scheme would yield.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1720	Vision	Awesome	Please refer to the general response to representations made by individuals and businesses.
Individual	R1723	Evidence	The views are subjective and need further scrutiny	Please refer to the general response to representations made by individuals and businesses.
Individual	R1724	Vision Map	Yes, it is inappropriate for West Norwood. The scale, height and density are too great and it destroys West Norwood's character	Please refer to the general response to representations made by individuals and businesses.
Individual	R1725	Vision	Buildings proposed for this site are too tall. And transport links to this area can't cope with the people that are already here. Tulse Hill has no step free access, the trains from West Norwood are so infrequent they may as well close the station and the busses take forever to get to Brixton because the resulting car traffic from said poor rail service and blocked off roads. Now you want more people to live here.?!?!?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1725	Context	Good public transport!!! Nope which idiot did this study and where is the evidence it takes 45 minutes to get a bus to Brixton, there's a train every 30 minutes to Victoria or London Bridge from West Norwood (even though it takes less than 30 minutes to both of those destinations) There more trains from Tulse Hill but good luck if you are wheelchair bound or a parent with a pram because there's no step free access, you could go to Herne hill but that takes 30 minutes on the bus because congestion is so bad because there are hardly any trains...fyi the Uber prices are pretty good indicator of this.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1726	Vision	Building is easy. Maintaining is hard. How will you guarantee the site is maintained beautifully?	Please refer to the general response to representations made by individuals and businesses.
Individual	R1726	Evidence	The quality and longevity of the frontage will have a great impact on the overall affect of this scheme. I worry about a slab-sided development that deteriorates rapidly.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1731	Vision Map	Supportive of the proposals.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1731	Vision	The approach to the allocation is consistent with the NPPF in seeking to maximise the use of brownfield land. Opportunities should be	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			considered for building setback to allow a cycle route to be provided along the stretch of high street.	
Individual	R1733	Site Allocation Policy	<p>Comment? You would ruin our area, uprooting generations and removing history.</p> <p>I know you won't listen to this however you to this, but these are things you need to know:</p> <ul style="list-style-type: none"> - This area has a very high crime rate and the council moving the locals which cause the most issues won't stop them loitering in your estates. high fences, security people/gates will not save the residents. Look at Brixton... - There are A LOT of crackheads and people with violent mental health issues sitting on corners harassing locals. - Without a doubt the residents WILL get mugged, and it will happen all the time. This is because they know the residents are rich as they know how expensive these flats are going to be. - The above also applies to robbery, especially as this area borders on West Dulwich SE21, which has the highest rate of burglaries in the whole of the UK because of the same reason. - When people find this out sooner rather than later who is going to want to live here, so no one will but these flats. <p>Personally, I believe it's to do with money laundering. That new estate in Elephant and Castle has a lot of empty flats, both unsold and sold but completely empty having never been used no furniture, nothing. Sus... I hope to god that you are caught for your money laundering. just know that I know</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1734	Site Allocation Policy	<p>Why not do this wherever you live or your area?</p> <p>Why not do this to the rich?</p> <p>Why do we have to pay for you literally?</p> <p>Maybe we should find out where YOU live and get planning applications to knock down YOUR entire area and do the same to your family and friends just as you did to us.</p> <p>Well...</p> <p>Karma is Going to you and yours anyway and I won't laugh but you will a cursed live and when you do I want you to remember this moment, even though it will be too late. Destruction? Illness? Even Death?</p> <p><i>*Whatever it is Karma Is Coming For You*</i></p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1735	General	<p>The viability and Aesthetic depends very much on the architecture of the tower block.</p> <p>If it is of architectural interest of novel and artistic design then it will benefit the community but a utilitarian, rectangular block would be very unwelcome and will miss an opportunity to enhance the area. The</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			development towards tulse hill has been a failure. Dirty, unkempt and in need of a paint it has become a blot on the landscape.	
Individual	R1736	Site Allocation Policy	390 to 470 self-contained residential units (gross) seem like too many as there is already much congestion on a very busy high street, There are already many problems with parking, sewage etc. Although from 35 per cent to 50 per cent affordable housing sounds good the extra population will add to an already crowded town centre	Please refer to the general response to representations made by individuals and businesses.
Individual	R1737	Evidence	Viewing the images I disagree that the new tall building options offer 'no harm' to the view, to the contrary, my eyes are drawn directly to it. The new buildings should be limited to or closely to (eg no more than one story - about 3 metres) above the remaining high street skyline buildings.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1740	Vision	Not a good plan for the high street. Don't see why the buildings needs to be that high. How about not breaching the tall buildings policy, and having appropriately high buildings, say 6 storeys? Huge risk we will lose some of the great small businesses with long history in the area. How are their interests being taken into account? Like the idea of a better public space, and wider pavements where possible, with more greenery. This should be achieved through an incremental and design-led approach with quality community engagement, not a rushed desktop exercise. There is tons of goodwill and interest in this community that should be harnessed. The current approach is achieving the opposite. Site 18 should be removed from the SADPD and a much better process of engagement and consultation conducted.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1746	Vision Map	The height of new developments should not exceed the average height of the surrounding buildings i.e. no tower blocks. Development should respect the generally low level of the surrounding residential area i.e. 2-3 storey residential development.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1751	Context Map	This proposal is totally wrong for West Norwood. The proposals are not in keeping with West Norwood as it currently is. This will add a large amount of extra traffic and footfall to an already congested high street. The buildings are blocky and domineering.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1753	Site Allocation Policy	Overall supportive of the plan for Site 18, including increasing density. I think the site is suitable for mixed commercial / residential. The main failing seems to be lack of public realm set back from the main road - a space equivalent to the south end of Railton Road in Herne Hill would be transformative for making West Norwood a pleasant high street environment - that means it needs to be fronted by high traffic commercial properties (pub, retail). Other improvements - being more specific about the need for a segregated cycle route north/south on Norwood Road, and significantly cycle storage both for new building residents and on the street for visitors to Norwood Road.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1755	Evidence	I absolutely disagree with everything they say about height of the new proposed buildings. it will dwarf everything around it and block light and not be in keeping with the area. I can't believe it is even being proposed. Looking at the photos used this was initially written a long time ago, and I'm guessing applied to the original proposals which were lower and less overbearing. That discount shop, photographed closed down many years ago. I don't think the computer graphics can claim to represent just how oppressive this new design will be on the area. I am sure if you proposed something like this in East Dulwich there would be a riot. Not here please.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1755	Sustainability Appraisal	If anything I think this will lead to more crime rather than less - because of the way it is crowding more people into a small space. To think that people will be less stressed is complete madness - when packed into small spaces to meet some bogus criteria. It doesn't even give the size of these spaces that these people will live in - which would indicate that if it is sustainable housing it will be small. Where are the people coming from to live here - are they being located from somewhere else and where are the schools that these people will send their children to? West Norwood, in particular the secondary schools are already over-subscribed - what provision will there be for more people coming into the area?? I don't think this plan is thought through - it is just another excuse to build badly designed flats into an already cramped area and add more stress on overburdened facilities - including doctors surgeries and dental practices. This space should be helping the people who already live here have a better life - not a more crowded space with less facilities. Think again.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1755	Vision Map	There should be more green spaces and less buildings.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1755	Vision	this is not the vision I would like to see - it is cramped and ugly. The buildings are too high and not in keeping with the area. Up until now we have been gradually turning West Norwood into a lovely area to live in - from a slightly unloved point of view. Don't destroy this gradual transformation with this unsightly blot on the landscape. To have a happy medium you need an organic and gradual change - not a heavy handed blunt instrument to make things right. This is not a proposal which will end well, and it won't appease or please most people who already live here - so think again.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1755	Vision	yes I believe the site is not well thought through and has no integration with the area itself. It does not remotely reflect the rich history of West Norwood and is a terrible travesty of town planning if it goes through. It is not in keeping with the height restrictions of other buildings and does not reflect the architecture of the area. I also believe the disruption from	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			such a huge build will impact the already very overcrowded main high street in an almost inconceivably awful way for commuters and children alike, going to school every morning. We have just recovered from Thames Water digging up the road and months of disruption, and now this proposed redevelopment will destroy the infrastructure here. I appreciate the current high street is in need of some TLC - but the removal of B&Q will be much missed for those without a car, and some small artisan stores will never return. The proposal before was far more in keeping and and I don't know how or why this new plan ever emerged from no where. West Norwood appears to be the dumping ground for all new tower blocks - which are completely out of keeping with the area and allegedly not allowed past the the South Circular so I'm not sure what the developers are playing at. I don't suppose there will be sustainable housing, because frankly who can afford a flat at £400K? And if there is housing like this - where are the outside spaces - there is none shown in this plan, which puts more stress on the surrounding area and parks. Congestion is one of the things West Norwood is really suffering from - in part because of road closures round minor roads - this will do absolutely nothing to resolve the problems. You must reconsider such a plan. I have spoken to so many people and no one likes the plan who lives in this area - so if it goes ahead I don't know who you have been consulting, but it's no one who lives here. Aren't we the ones that matter - not the council, or developers with big bank balances?	
Individual	R1757	Vision	There are already too many shops empty on Norwood road. We don't need any new premises. How many estate agents and nail bars can we need? By who's standards will the "high architectural quality" be evaluated.I am concerned by the 11 storey block proposed.being on a hill will dominate the skyline and block light onto the proposed public space making it unwelcoming.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1758	Vision	Ruins high street and buildings too high	Please refer to the general response to representations made by individuals and businesses.
Individual	R1759	Evidence	The permitted heights are excessive and out of character with the town centre.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1759	Site Allocation Policy	The proposed building heights are too great and out of character with the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1759	Vision	The vision for this site could be achieved through thoughtful renovation rather than demolition and renewal, allowing the area to retain its Victorian appearance consistent with the surrounding residential areas and the cemetery and church.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1770	Site Allocation Policy	<p>While supportive of the proposed regeneration of West Norwood high street, as residents we would like to seek reassurances on two points, which we think need to be addressed further:</p> <p>a) Council/affordable housing: the plan sets out the ambition to have between 35% and 50% affordable housing. If we want to really regenerate the neighborhood we should attract professionals; we are therefore against any significant increase of affordable and even less council housing, of which the borough is already well provided.</p> <p>b) Transport: we should not increase the number of residents in the local area without proportionate improvement in the area public transport links. We currently rely on very poor and overcrowded service by southern trains and good but slow buses connections. These plans should be accompanied by plans (timed to be achieved in parallel) to strengthen rail/tube links to central london with 'turn up and go' metro style services as well as improving East-West links (in line with the recommendations set in the Lambeth Local plan 2020/2035). We oppose the development of significant residential buildings without an articulations of concrete plans to address the south london transport crisis.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1776	Vision	It impacts too much on the existing high street. The proposed buildings will be far too tall for the given area. And a terrible strain on an already overstretched infrastructure. I strongly object.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1778	Vision	A high density housing scheme dressed thinly in a disguise of sustainability. There will be cars, which will have to park and drive somewhere in an area that is already very congested (thanks in part to low traffic schemes elsewhere). West Norwood has improved immensely over the past five or six years (pandemic notwithstanding) and this proposed blanket redevelopment would undo the fragile sense of community that is currently emerging. A more sensitive, smaller and incremental plan is needed.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1778	Evidence	The large size of the buildings will transform the character of the neighbourhood adversely. The schematic approach used in the Site 18 Evidence Document does not represent adequately the adverse impact of the development on the area. The density of the housing will inevitably cause adverse effects in traffic and parking. The presence of a large high rise building is out of place in the context of the low-rise housing throughout the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1779	Evidence	It's always disappointing when there is no evidence to support increased heights in relation to the existing context. The high street is 3-4 storeys and you are proposing 6, stepping up to 12 at the back. I just don't see the justification for it. Or have I missed something? Similarly I cannot find any attempt to retain some of the historic frontage that	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			contributes to the character of the high street. To remove the entire western frontage of the high street seems particularly lazy. Sure it's easier to demolish it all and replan, but the run of buildings between Waylet place are attractive. I would be interested in how all the demolition will address embodied carbon.	
Individual	R1779	Vision	Sounds very generic to me. Not sure how necessary an increased footpath is, I would rather retain some of the historic frontage.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1779	Vision Map	The vision map makes sense, apart from the location for a tall building. It's just a strange location for a building of 12 storeys, it's not a big town centre like brixton!	Please refer to the general response to representations made by individuals and businesses.
Individual	R1782	Vision	<p>Our community is not a blank canvas on which to enact your architectural fancies. Lack of investment and planning have left the neighbourhood ugly and fragmented but that is the fault of long term neglect on the part of the council. This is a case of extreme over correction. It cannot be good practice to demolish existing communities and assets to then impose a new scheme on the community without explicit consent.</p> <p>It should be best practice to enhance what is there and build within and around on the derelict land within the site. This project calls for better architecture not just more.</p> <p>The remarkable print studio, the b and q, Knowles, every cafe, and shop, church, and homes deserves more respect</p> <p>The community will not be well served by monolithic poorly considered architecture. The proposed scope is wildly out of balance with the west Norwood area where buildings are predominately four stories.</p> <p>You have proposed a project easy to conceive of when you should have proposed something more nuanced and challenging to produce a better outcome for the community. A project that should enhance rather than replace</p> <p>Poor planning in the 20th century has already left that side of the street with a fragmented identity, with gaps in its frontage, inconsistent relationship across the road. This is sad but could be remedied. To totally demolish would erase the history and identity altogether, the whole story gone, and replace it with the characterless generic urban environment that is typically of so many current developments. It is not for you to cast judgement on our community and find it lacking. Ask what we want, then respond.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1786	Context Map	Preservation and enhancement of current amenities must be a priority	Please refer to the general response to representations made by individuals and businesses.
Individual	R1786	Site Allocation Policy	While many of the proposed plans appear to be sensible improvements to the area, there should be serious consideration given to putting up buildings of remarkable height. To ensure the character and vibrancy of	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			the high street, all commercial lots should be filled as much as possible before building is completed to ensure there are none (or as few as possible empty lots). Utilising a lot of the currently dead space behind the high street shops in the proposed area is a welcome element and increasing the greenery of the high street without impeding the views and feel of the current high street would be a great achievement.	
Individual	R1790	Vision	Lack of consultation, don't recall any councillors engaging about these plans when canvassing. Not the best plans for the local area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1796	Site Allocation Policy	This is an inappropriate development for area and should be discontinued and a proposal more in tune with the needs and desires of local people and NOT the developers should be drawn up.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1800	Vision	I object to this proposal. This proposal is not size appropriate and will spoil West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1803	Vision	I think it's devastating building hi rise blocks casting a long term shadow physically and emotionally over West Norwood town centre	Please refer to the general response to representations made by individuals and businesses.
Individual	R1809	Site Allocation Policy	The proposed buildings are too tall and too big. The space allocation, density and external envelope of the buildings proposed is far too big and block-like in light of the character of the neighbourhood. The proposals are ugly and unsympathetic to the local area including the nearby church and cemetery. There should be full consultation with local people to develop proposals which are community friendly and which will be sympathetic to the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1819	Evidence	I am supportive of building more affordable homes in West Norwood. However the size of proposed buildings is out of character with the other buildings on the high street. We don't need buildings that "announce the start of the town", this is a residential, low rise, suburban area and should be respected by any development. Equally no provision seems to have been made for amenities such as the petrol station or large scale shops like B&Q or Iceland that are valued and regularly used by residents. Nor is there any provision for parking for the new housing which will only put excessive pressure on surrounding roads. These proposals for Site18 should be removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1821	General	I repeat my previous comment that a building 10 stories is completely out of keeping with the neighbourhood and therefore not a sustainable development for this area as it will destabilise the area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1821	Vision	Whilst I agree that elements of the site could benefit from some redevelopment, I disagree that the oldest buildings on the high street should be demolished to achieve this. I certainly disagree that this area can sustain a building 12 stories high, a proposal completely at odds with the 2021 Local Lambeth Plan which states: "Proposals for tall buildings will only be considered acceptable in established low rise	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			residential neighbourhoods where they are part of a comprehensive scheme that integrates well with the locality." Given how this proposal contains buildings more than double the height of current buildings, it cannot be said to be part of a scheme of integration.	
Individual	R1823	Vision Map	The Vision Map is a vague outline which apparently includes building of 36m way out of scale with the area (and apparently admitted to be so!). It also seems to propose (though there is no detail in the proposal at all) destruction of good, workable and in-scale buildings on the Norwood Road. There is virtually no information about the proposed replacement buildings other than their height! This massive development needs some careful and thorough working out which it has clearly not had.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1826	Vision	It is the first I have heard of it. There needs to be proper public consultation. This is a proposal that would have huge impact on the high street with its mix of independent businesses and established chains.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1834	Site Allocation Policy	Very disappointing high density residential plan showing no architectural flair or imagination to enhance the local area or address the well-being requirements of future residents. This style of planning does not appear to show lessons learned from previous block style developments which are now being demolished in a lot of London boroughs and being replaced by low rise accommodation with greater access to surrounding outside space. Norwood Road has a spacious feel about it due to the current height of buildings this plan is intrusive, an 11 storey tower completely unnecessary and out of step with the surrounding area. There is insufficient guarantee of greening and trees/shrubs and green space in this plan "where possible" is a great excuse not to try. This does not add anything to the locality and does not provide a development that is sustainable for the local community. The local community who live locally and use the businesses on Norwood Road enhance should be properly consulted and a number of different styles of development put forward. This plan does not create a pleasant hub for the local community and ruins the area's character. What happens to all the businesses currently bordering this development? it appears that they are being wiped out - how are these business owners going to survive. B&Q is a tremendous asset and very popular to have locally especially with its own parking - it would be a great shame to lose this as it will cause more longer car journeys to other parts of London instead - what I thought we were supposed to be avoiding.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1839	Vision	I think it's pretty disgusting that the neighbourhood is under such threat of a monster development of the such. The improvements to the community are mentioned as a tick box exercise. How is a small patch of green behind a huge build that will generate more cars, more traffic	Please refer to the general response to representations made by individuals and businesses.

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Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>etc considered « nature area ». How will all these new residents be accommodated in the parking, traffic and gas emission reduction plans. You think all these new residents will be cyclists only?</p> <p>West norwood is a neighbour that has so much to offer but unfortunately local businesses are not valued and supported as much as they should nor is community living where we aim for better than a hen battery!</p> <p>Surrounding neighbourhoods enhance cycling routes (with road closures) and community living and we end up with Dulwich diverted traffic in west norwood. What do we do about those issues? Nothing but instead plan on adding to them.</p> <p>You will kill the soul of the neighborhood, it's identity and what it's about. Who will benefit from this plan? Who did you consult for this plan? Who helped Lambeth come up with this? Were any focus groups to explore residents views wishes and opinions.</p> <p>I think Lambeth is doing a disgusting job at involving and consulting with its residents.</p> <p>That proposal really worries and saddens me to be honest.</p>	
Individual	R1843	Site Allocation Policy	<p>I am really unhappy about these proposals for site 18 and site 19. I am a local resident and have lived in west norwood for 14 years. The plans are totally out of keeping for the area. The tall blocks are ugly and not in keeping with the neighbourhood. The height and look of them are suitable for central London - not a local neighbourhood. It's not in keeping with the character of the area. It's also hugely impractical. The local roads are small residential roads and are already congested. They cannot support the increased traffic. York road is a narrow road and not suitable for increased traffic. Broxholm road - an approach road to the royal circus leading to York hill and these blocks is already congested and has frequent altercations. Many residents will lose their views and light. The site will destroy wildlife and trees which are under special protection orders. The plans for these sites must be removed from the consultation.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1845	Vision	<p>This will completely change West Norwood for the worse. Blocks and blocks of high rise flats when what we need is a normal high street with space to walk. 5 storeys high on the hisgh street will make it feel dark and oppressive and the tall buildings behind will blot the landscape until they're torn down. We've lived here for 20 years and now have children at the local school. We will be forced to leave I fear if this goes ahead. There will be no parking for these new residents. It will be a building site for years and the worst thing is just how monstrous and oppressive it will be when it's finished.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1847	Vision Map	The Vision Map is a vague outline and there is little evidence of a stringent consultation with the community. Whilst I agree that elements of the site could benefit from some redevelopment, I strongly disagree with the outline proposal. The proposal is an 'off-the shelf' template proposal that takes no consideration of the existing location and its community, and it also does not safeguard essential communal, civil or public components or secures their delivery. There are no articulated ambitions to generate an affordable housing scheme that is also a desirable place to live & work in. No spatial qualities have been articulated. There is no sense of place and no idea of a distinctive Highstreet. There is no Net-Zero strategy and there are no enjoyable green spaces	Please refer to the general response to representations made by individuals and businesses.
Individual	R1847	Vision Map	Site 18 offers an opportunity to deliver a truly inspiring project. Please look beyond pure massing and consider what is actually appropriate in terms of development here. This bland 'tabula-rasa' is unnecessary and also in direct conflict with your sustainability aims. Much greater consideration should be taken to assess existing buildings and occupants. Given the climate and also affordability crisis, it should be a priority for the council to carefully consider which buildings could actually be retained or retrofitted, rather than taking everything out.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1847	Vision Map	The presented plan is pure provision with no consideration given to the needs and desires of those who will ultimately live and work within this development, or the wider community whose "High Street" will turn into a bland and uninspiring place. It is dispiriting to see how low the ambitions are set here. There are many innovative and engaging architectural housing, mixed used schemes and ideas for our High Streets out there that could be influencing your stance; many of these are dense but also low rise. I disagree that this area can sustain a 11-12 story high building, a proposal completely at odds with the 2021 Local Lambeth. There are other ways to achieve a certain degree of density without the Need for out-of-place high-rise buildings. There are also many innovative ideas of governance that secure affordability. Please look beyond the developer model.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1847	Vision Map	The proposal also takes no consideration of the lessons that we should have all learned from the current pandemic, such as the need to provide spaces with access to high-quality outdoor spaces for all, the need for distinctive and inspiring high streets, and the need to provide alternative models for housing, working, retail and community spaces. Instead of repeating what fails elsewhere and what destroys a sense of community and place, this could be a proposal that takes all of these things into consideration. It could, and it should. For this to happen, the council should engage with the community, not deliver against it. It should not	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			overdevelop a site to secure more council tax, it should consider what has longevity, is wanted but also affordable and will create a better environment and place for everyone. Please look beyond this template. Engage with Architecture Schools who can show you many wonderful ideas and most importantly engage with the community and their strive for a neighbourhood plan that is actually welcome. Remove the proposals for Site18 and generate new plans developed with the local community. You only have to look at the many suggestions presented to you here. Engage. You are lucky to have such committed local people who want to give you their spare time to create spaces that we all welcome. Take the opportunity presented to you. Anything else is short-term vision that will create a fallout later which will be much more costly, financially but also in other ways. Thank you	
Individual	R1848	Vision	I don't think an 11 storey tower is appropriate for our suburban neighbourhood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1849	Vision	The proposals over develop the local area, destroy the remnants of the Victorian town centre and clash with the remaining housing and infrastructure. Far too tall and bulky.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1690	Sustainability Appraisal	The proposal would destroy the look and feel of the whole West Norwood shopping area because the proposed blocks are excessively tall and out of keeping with the area. I agree with those who want a scheme that takes into account the views of the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1237	Other	I live on [redacted] and I am writing to demand the proposals for Site18 and Site19 to be removed from this consultation and new plans developed with the local community. Here is why: - it will massively impact on the communities of west norwood and tulse Hill. - there isn't sufficient planning and time to engage the community of this proposal and the long term impact. The scale of the development will destroy the quiet neighbourhood which we cherish, and wish to bring our children in. The towers will block the sunlight to hundreds of homes and bring in too much traffic.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1238	Other	I hope you are well. I am a resident of West Norwood and a chartered architect working for Formation Architect based in Oval, London. The proposals for Site 18 and Site 19 should be reconsidered due to the following reasons. Site 18: - Historic fabric of the High Street to be demolished due to the proposals. Integrating them would be beneficial. Keeping height low on the High Street with larger buildings behind could work. - Impacts the adjacent Conservation Area. - Thorough and well executed public consultation to be sought.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1239	Other	<p>I object to these developments on the following grounds:</p> <ul style="list-style-type: none"> - Destroys character of local area - Threatens local homes and businesses - No consideration to Lambeth net zero target for 2030 - No vision for town centre fit for 2050 - Site not viable for affordable housing - Increased pressure on local services - Less parking, increased traffic and reduced air quality - Destruction of wildlife and protected trees - Loss of light, amenity and visual skyline <p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1241	Other	<p>I am a resident of West Norwood and I object to the plans for Site18 and Site19 are demand that they are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1242	Other	<p>I am a resident of West Norwood and I demand the proposals for Site 18 and Site 19 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1243	Other	<p>The proposals for Site 18 and Site 19 should be reconsidered due to the following reasons.</p> <p>Site 18:</p> <ul style="list-style-type: none"> - Historic fabric of the High Street to be demolished due to the proposals. Integrating them would be beneficial. Keeping height low on the High Street with larger buildings behind could work. - Impacts the adjacent Conservation Area. - Thorough and well executed public consultation to be sought. 	Please refer to the general response to representations made by individuals and businesses.
Individual/Norwood Planning Assembly	R1263	Other	<p>I am writing as a local resident and in my capacity as the chair of the Norwood Planning Assembly to register my strong objection to the current proposals for Site 18 and Site 19 in the Draft Site Allocations DPD.</p> <p>As a collective the Norwood Planning Assembly, Norwood Forum and Norwood Action Group set out a number of issues and concerns ahead of our meeting with officers which were inadequately responded to.</p>	Noted.
Individual/Norwood Planning Assembly	R1263	Other	<p>Essentially while the need for housing and regeneration of the area is clear, the proposals as currently drafted have the potential to lead to exceptionally poor development that will be detrimental to both existing and future residents.</p>	<p>The purpose of the SADPD is to set a vision for Site 18 which outlines the basic parameters that should guide any future development of the site. Such parameters include land uses and their quantum as well as indicative heights of buildings. The SADPD is not a development proposal for the site. Development proposals on any of the parcels within the site will be put forward by applicants in due course and follow the standard planning application process.</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual/Norwood Planning Assembly	R1263	Other	The consultation as undertaken while clear met the statutory minimum, failed to properly engage the local community and there is now an increasing level of anger among local people around the approach and impact that these developments could have.	<p>On 13 December 2021 a Consultation and Engagement Plan for the Regulation 18 consultation of the Draft SADPD was agreed by Cabinet. Based on this plan, Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020, a timeframe for the consultation was drafted.</p> <p>A full report on the Regulation 18 consultation will be published alongside the SADPD Proposed Submission Version. The report explains in detail the methods the council used to raise awareness about the consultation and to encourage people to respond. The primary method used was Commonplace, the digital consultation platform used by the Council. Supplementary methods included engagement with ward councillors, local MPs, Area Meetings with representatives from community groups and organisations based in neighbourhoods which proposed to allocate a site in the SADPD, presentations, and workshops with Young People.</p> <p>Ward councillors were engaged in meetings on 8, 9 and 16 December 2021, all held virtually following government guidance on the COVID-19 pandemic. Local MPs were briefed on 21 January and 1 February 2022. Both ward councillors and local MPs were invited to join Area Meetings. The Area Meeting for West Norwood was held virtually on 24 January 2022 following government guidance on the COVID-19 pandemic. Ward councillors, local MPs, as well as representatives from community groups and local organisations were provided with the information necessary to support residents in accessing the consultation material and encouraged to disseminate information about the consultation to the wider community.</p> <p>Council's own publicity and dissemination methods included i) notifications by email to over 2,000 contacts, including the statutory, specific and general consultation bodies required by the regulations, but also community stakeholders, ii) publications on social media platforms such as Twitter, Facebook, Instagram, LinkedIn and Nextdoor, iii) a blog post on Love Lambeth, iv) online newsletters and bulletins, v) physical copies of the draft SADPD displayed in public libraries, and vi) a dedicated website. The council also notified up to 1,141 groups through Integrate, a directory of voluntary, community and social enterprise sector organisations that operate in the borough.</p> <p>Following the consultation, the council organised three targeted stakeholder engagement workshops with representatives of the community stakeholder groups that had submitted responses to the Regulation 18 consultation on draft sites 18 and 19 in West Norwood/Tulse Hill. These were held over a six-week period in October and November 2022. These workshops provided an opportunity for Council officers and members to further explore the points raised in the Regulation 18 representations with local representatives. These workshops have helped inform the Council's</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				consideration of the Regulation 18 consultation responses received and the resulting content of the SADPD Proposed Submission Version. Beyond the next round of consultation under Regulation 19, the planning application process offers further opportunities for community involvement. As indicated in Lambeth's Statement of Community Involvement, these opportunities include opportunities for community involvement led by the developer or applicant considering putting forward any parcel within the site for development. They are encouraged to engage with the community and stakeholders before submitting any application. The planning application process also allows for members of the community and community groups to submit representations during the planning consultation period open for all planning applications, which normally lasts 21 days. Anyone can respond to a planning consultation regardless of whether they are specifically consulted or not. Any interested parties are encouraged to register with the Lambeth's Planning Applications Database in order to be notified about applications in their area or any part of the borough they are interested on.
Individual/Norwood Planning Assembly	R1263	Other	As a planning assembly we consider that an appropriately resourced neighbourhood plan could provide a much better vehicle for the council to engage local people and come up with much better thought through proposals for these sites that will bring about the wider regeneration that Norwood needs, and not something that will effectively lead to poor quality, developer driven outcomes.	Neighbourhood forums are encouraged to develop neighbourhood plans. The designation of the Norwood Planning Assembly Neighbourhood Forum was approved by the Cabinet of the Council in July 2017. However, these designations expire after five years, meaning that the designation of the Norwood Planning Assembly Neighbourhood Forum has expired before the forum has been able to produce a neighbourhood plan for the area. The council's policy on giving advice and assistance to local groups at the different stages of the neighbourhood planning process are set out in the Statement of Community Involvement.
Individual	R1247	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1248	Other	In whole I would like to personally object to the outlined West Norwood Site 18 and 19 proposals. Both sites appear over developed with very little consideration to an already congested area. General traffic in the area is already causing excessive pollution especially on already busy school walking routes. The local infrastructure is at breaking point, these plans do not include provisions for increased school capacities, or health and welfare provision. There has been very little public consultation or awareness of these proposals, can you please provide further information of how Lambeth propose how these developments will interface with the existing communities, surrounding businesses, services and social infrastructure.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1249	Other	I am a resident of West Norwood and Im writing to demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1250	Other	I am a resident of West Norwood and I ask that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. Whilst I am not opposed to development it's imperative that the community is consulted with to find a solution that meets the needs of all the community, and creates overall benefit to the local residents and businesses of West Norwood.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1251	Other	These plans are a nonsense! How can anyone look at this and think it's suitable for the area. Not sure how many disastrous developments are considered by this council in west norwood but this one takes the biscuit. Please don't allow this to go ahead, what a disaster it'll be.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1253	Other	I wish to object to the development of site 18 and 19 for the following reasons:- It would destroy the character of the local area. The sites are not suitable for affordable housing There will be destruction of wildlife and specially protected species There will be less parking (already a problem) and traffic chaos Businesses will close and it will cause local job loss. Please register my objection to this monstrous development planned.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1254	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1255	Other	I am a resident of Knollys Road and I demand the plans for Site 18, and Site 19 are removed from the SADPD consultation and new plans actually developed with the community rather than shoehorning in two completely unsuitable, ill thought out proposals. The scale of both developments are completely out of context and would destroy the character of the quiet, low-rise nature of the West Norwood neighbourhood. Please take them off the SADPD and work with us to develop something that is actually beneficial to our local area	Please refer to the general response to representations made by individuals and businesses.
Individual	R1256	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1259	Other	I request that you withdraw the proposals for sites 18 & 19 from the SADPD document. Then you can work with the community to produce better plans for all.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			I live in West Norwood and have been shocked by the lack of action by the council to develop the empty site 18 - over decades. New housing and work spaces have been needed all this time but with much less density and height than now proposed.	
Individual	R1260	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1262	Other	I'm a resident of West Norwood, and I demand the proposal for site 18 and site 19 be removed from this consultation and new plans be developed with the community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1266	Other	I am a resident of West Norwood and I demand the programs for Site 18 and Site 19 are removed from the consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Cllr Peter Elliott, Lambeth Green Group	R1321	Other	<p>Additionally I also wish to register as a Gipsy Hill and West Norwood councillor, that if the other sites do go ahead as planned then I wish to formally request in the strongest terms that sites 18 and 19 in West Norwood are removed from this package and have no further work done on them without input from the various stakeholder groups in and around West Norwood.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p>	<p>The purpose of the SADPD is to set a vision for Site 18 which outlines the basic parameters that should guide any future development of the site. Such parameters include land uses and their quantum as well as indicative heights of buildings. The SADPD is not a development proposal for the site. Development proposals on any of the parcels within the site will be put forward by applicants in due course and follow the standard planning application process.</p> <p>The proposed site allocation builds up on previous work including the preparation of the 2007 Unitary Development Plan (UDP 2007), the production of the 2009 Masterplan, the West Norwood and Tulse Hill: A Manual for Delivery, published in 2017, which provided a framework to guide the future development of the site.</p> <p>Previous pieces of work and other consultation work in West Norwood, have provided an extensive and valuable insight on local community aspirations and priorities, such as a desire to support the growth of the town centre and local businesses, to provide new mixed tenure housing, to improve public realm, pedestrian and cyclist permeability and public transport accessibility. This intelligence has informed the content of the SADPD for Site 18.</p> <p>Neighbourhood forums are encouraged to develop neighbourhood plans. The designation of the Norwood Planning Assembly Neighbourhood Forum was approved by the Cabinet of the Council in July 2017. However, these designations expire after five years, meaning that the designation of the Norwood Planning Assembly Neighbourhood Forum has expired before the forum has been able to produce a neighbourhood plan for the area. Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. This includes the timeframe of the consultation. A Consultation and</p>

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
				<p>Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.</p> <p>After the end of the consultation period, the council organised three targeted stakeholder engagement workshops with representatives of the community stakeholder groups that had submitted responses to the Regulation 18 consultation on draft sites 18 and 19 in West Norwood/Tulse Hill. These were held over a six-week period in October and November 2022. These workshops provided an opportunity for Council officers and members to explore further the points raised in the Regulation 18 representations with local representatives. These workshops have helped inform the Council's consideration of the Regulation 18 consultation responses received and the resulting content of the Proposed Submission Version SADPD for Site 18.</p> <p>As set out in Lambeth's Statement of Community Involvement, further opportunities for community involvement will be available along the planning application process. These opportunities include opportunities for community involvement led by the developer or applicant, who are encouraged to engage with the community and stakeholders before submitting any application. The planning application process also allows for members of the community and community groups to submit representations during the planning consultation period open for all planning applications, which normally lasts 21 days. Anyone can respond to a planning consultation regardless of whether they are specifically consulted or not. Any interested parties are encouraged to register with the Lambeth's Planning Applications Database in order to be notified about applications in their area or any part of the borough they are interested on.</p>
Cllr Peter Elliott, Lambeth Green Group	R1321	Other	The massing of some of the proposals are inappropriate for the areas and will change the whole feel especially that of the two sites (18 and 19) in West Norwood.	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.
Individual	R1264	Other	<p>I am a resident of West Norwood, and I urgently request that the proposals for Site 18 and Site 19 be removed from this consultation and new plans developed with the local community.</p> <ul style="list-style-type: none"> - Unlike the other 12 sites, the proposed developments for Site 18 and Site 19 will profoundly and disproportionately affect the retail and residential heart of West Norwood and Tulse Hill, as none of the other town centres would be. - The consultation process should be handled differently to reflect the different nature of these proposals for Site 18 and Site 19. 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>- There has been grossly insufficient time to engage the community so that they can adequately comprehend the impact of these proposals.</p> <p>- The current approach is without precedent in that it ignores all previous good practice community consultation, and in effect makes a mockery of it. Cf The 2017 Masterplan: Moving Forward - A Collaborative Approach To Delivery.</p>	
Individual	R1265	Other	<p>I wish to object to the development of site 18 and 19 for the following reasons:-</p> <p>It would destroy the character of the local area.</p> <p>The sites are not suitable for affordable housing</p> <p>There will be destruction of wildlife and specially protected species</p> <p>There will be less parking (already a problem) and traffic chaos</p> <p>Businesses will close and it will cause local job loss.</p> <p>Please register my objection to this monstrous development planned.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1267	Other	<p>As a local resident to this proposed development, I object to this moving forward. There has been no information proactively provided to the local community and I can not see that a comprehensive assessment has been conducted on the impact regarding additional traffic, pollution, pressure on local services including schools, healthcare, public transportation or the environmental impact.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1270	Other	<p>I demand on behalf of my whole family that the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>This is a vibrant and engaged community which is diverse and inclusive. We expect the council to behave in a fair and equitable way around these plans and fo allow those most impacted them - the local residents - to express their views, and have them seriously considered. This is imperative.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1272	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1273	Other	<p>I have lived in the same residential road just behind Norwood Road for 33 years. I have been a Lambeth tax payer for 36 years.</p> <p>West Norwood is not a town which has a 'townscape' - it is an urban village. Those drawing up these plans clearly have no understanding of the difference. Bromley and Beckenham have town centres which can accommodate high rise offices/flats without changing their essential character and environment. West Norwood is fundamentally different. Site 18 (and 19) proposals have no place in an urban village like West Norwood.</p> <p>Whilst I would like to see the Norwood Road area improved for residents, visitors and businesses with some additional, proportionate</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>new housing, I am horrified by the proposed changes. Site 18 proposals would destroy the unique character of West Norwood. Many of our much-loved quirky, slightly eccentric mix of buildings, businesses and community hubs would be replaced by an austere, soulless high-rise estate.</p> <p>West Norwood has been, for many years, an unusually inclusive place. Very few areas of Lambeth can offer such a comprehensive mix across all social classes, ethnic groups, which caters for all ages; it is known to be an area where LGBTQ people feel safe and welcome. The site 18 development would dominate and overshadow the socio-economic balance and character of the area. A much smaller scaled down alternative development created with input from local community groups is the only way this could be avoided.</p>	
Individual	R1273	Other	<ul style="list-style-type: none"> • My specific objections are: <p>Re: the duty to take a design-led approach to optimise site capacity</p> <p>Evaluation of the site's attributes: Negative - access is poor, local amenities do not allow for a considerable increase in population, roads are congested and pollution is high.</p> <ul style="list-style-type: none"> • Surrounding context: Negative - West Norwood is an urban village with a characterful High Street of low-rise buildings. Bland modern tall structures as proposed are totally unsuited to the area context 	Please refer to the general response to representations made by individuals and businesses.
Individual	R1273	Other	<ul style="list-style-type: none"> • Capacity for growth: Negative - West Norwood lacks the general infrastructure (schools, health centres, amenities, road access) for a large development of this nature <p>Re: requirement to consider optimisation of mass and height</p> <ul style="list-style-type: none"> • Any development in the area over 3 stories high is unsuitable in West Norwood • It would harm the local economy (people would avoid shopping/visiting) the area • The visual impact of higher buildings would be ruinous to the village landscape and overshadow the heritage assets • Planting trees strategically to improve the view would not change the impact in reality. 	Please refer to the general response to representations made by individuals and businesses.
Individual	R1273	Site Allocation Policy	<p>Re: sustainability objectives</p> <ul style="list-style-type: none"> • The proposals are not inclusive; they are exclusive. Many people who traditionally frequent Norwood Road for shopping and amenities would avoid it as they would not feel safe. Tall, large structures make people feel physically wary. Moreover, the proposal to include an open area opposite Chatsworth Way will lead to concerns about (and actual) anti-social behaviour. Residents like me will no longer shop in Norwood Road for that reason. • The unique distinctiveness of Norwood Road and its environs will be 	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>destroyed. The health and mental wellbeing of people who live/work in the area will be negatively impacted as result. This will lead to further health inequality as many residents in West Norwood are lower on the income scale in comparison with nearby affluent areas such as Herne Hill and Dulwich.</p> <ul style="list-style-type: none"> • I am greatly concerned about the development leading to an increase in crime in the area particular drug dealing • West Norwood lacks the access facilities, infrastructure (especially school places and healthcare facilities) and amenities for so many additional residential units • The proposal does not realistically offer urban greening. A high rise development as proposed will make area feel like an urban desert. A few pots and trees will not change this. • The increase in pollution will have significant adverse impact <p>Comment: There is a better way to offer community and commercial spaces. Good examples can be found in Lordship Lane and in Crystal Palace where long standing traditional buildings (with shops below) are used for this purpose. It would be better to keep some of the existing buildings on Norwood Road on both sides.</p>	
Individual	R1273	Evidence	<p>Re: TVIA impact</p> <p>Most of the TVIA impact analysis is waffle - none of which changes the fact that the proposed development will adversely impact the area in every way. West Norwood can and should be improved BUT this should be achieved without destroying its urban village character.</p> <ul style="list-style-type: none"> • TVA Image 12 (very close to where I live) states - "The greatest height within the Indicative approach provides a visual termination at the end of the road – announcing the presence of the town centre. It is clearly noticeable but not discordant and the breadth of Chatsworth Way ensures it that does not appear unduly dominant. " • This narrative is meaningless nonsense: you could say the same of an active volcano. We are not stupid in West Norwood! 	Please refer to the general response to representations made by individuals and businesses.
Individual	R1273	Other	<p>Finally, as a Lambeth resident of many decades, I think it is disgraceful that I only came to learn of these proposals a few days ago from a local action group posting a flyer through my letter box. As a public body, Lambeth has a legal duty to act reasonably which means it must take adequate steps to ensure affected parties (such as myself) are notified of these proposals. Lambeth has failed to comply with its legal obligations in this regard.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1274	Other	<p>I write for concerned residents of Towton Road SE27 who object to the council's proposal for development, known as Sites 18 & 19. Proposals should be completely dropped and removed. Any new plans should must involve the local community from inception and genesis.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1275	Other	<p>I would like to formally object to this proposed development on Knolly's Road which will have profoundly negative impact on our local neighbourhood.</p> <p>I live on Stockfield Road, which has seen profound impacts on traffic since LTNs we're introduced to our area.</p> <p>Heavy traffic along Leigham Vale already causes substantial pollution for our children at Hitherfield Primary School.</p> <p>A development of this scale will only compound this problem for the young children living in our community.</p> <p>The development will have an entirely negative impact on our local community, creating extra traffic problems on roads that are already struggling to cope.</p> <p>Our neighbourhood is already struggling with pollution and traffic issues, our residents should not be subjected to a development of this scale which will only exacerbate this for the many young families who live here.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1276	Other	<p>I am a resident of West Norwood and I demand the plans for Site 18, and Site 19 are removed from the SADPD consultation and new plans developed with the community.</p> <p>The scale of both developments are completely out of context and would destroy the character of the quiet, low-rise nature of the West Norwood neighbourhood.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1277	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1278	Other	<p>I have been a resident since birth and the consultation has been poor in discussing how you are planning to destroy our skyline and increase parking and pollution problems in this area. You have just built the apartments above Iceland and now you believe it is best for you to tear it down and start again.</p> <p>No I object to more parking problems, I object to the large amount of flats been considered in this consultation with little or no green space for the occupants to use. I object to the high rises that will destroy our skyline.</p> <p>You are taking away our petrol station and our local b and q which was a godsend during the pandemic. You are taking our local mechanics and car wash establishment that will increase our commute for these services in the future.</p> <p>We have forums that have been discussing with the local community on what they want for their community and I am assured that what you have suggested, is not what we have asked for.</p> <p>Accept this as my objection</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1279	Other	<p>We strongly object to the current proposals for Site 18 and Site 19 in Lambeth's plans and demand that new plans for these sites are drawn up in consultation with the local community.</p> <p>The current proposals for both sites threaten to destroy utterly the character of the area, by introducing monstrously high blocks in a predominantly low rise residential area.</p> <p>The character of West Norwood largely depends on the look of the hotchpotch of low rise businesses along Norwood Road. There is an improved environment and real community spirit at present in the area, which would be destroyed by the high blocks currently proposed for Site 18, which would ruin the feel of the main road by casting great shadow across the centre of the town. We do not want the current businesses to be forced out, or to live through years of building development disrupting local life. The 11 storey block in particular proposed for site 18 would be totally out of keeping in this part of the borough.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1280	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1281	Other	<p>I am writing as a resident of West Norwood to strongly object to the site 18 and site 19 development plans for the following reasons:</p> <ul style="list-style-type: none"> -insufficient consultation of the local community -potentially disastrous effect of the proposals on existing local shops and businesses, destroying the important community feel of the area -architecture out of keeping with existing local architecture -insufficient environmental considerations -unclear what will happen to B&Q, which is a really important shop for the area 	Please refer to the general response to representations made by individuals and businesses.
Individual	R1283	Other	<p>As a resident of West Norwood living very close to both of these proposed developments I think these should be removed from the consultation Lambeth Site Allocation Development Plans draft consultation. These are major proposals and the consultation has been woefully inadequate.</p> <p>New plans should be developed with the residential and business community of West Norwood.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1284	Other	I am writing to express serious concerns about the proposed major developments in West Norwood. The proposed developments site 18 and site 19 look set to wreck the character and environment of the area with colossal blocks dumped on the community. Local people must be consulted much more about plans for more housing.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1285	Other	I am absolutely dumbfounded that Lambeth are even considering this development, it will impact extremely negatively on the community around it. There is no infrastructure in place for such a huge	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			development, the roads are small and overcrowded as it is. This is a residential area not a place for huge tower blocks. Under absolutely no circumstances should this be considered.	
Individual	R1287	Other	<p>I wish to object strongly to the proposals for sites 18 and 19 contained in this document.</p> <p>As far as I am aware, there has been no consultation with the residents and businesses in West Norwood and Tulse Hill about these proposals. I therefore request that Sites 18 and 19 are removed from the plan so that there can be full consultation and engagement with the local community about what is to happen to these sites. This must be done BEFORE this plan is launched.</p> <p>My reasons are as follows:</p> <p>Site 18</p> <ol style="list-style-type: none"> 1. The proposals for this site would involve demolishing the homes of more than 80 families and more than 25 existing retail and other businesses between Lansdowne Hill and York Hill. Again, huge tower blocks are included in the proposals. 2. This is totally out of keeping with the character of West Norwood and in particular the local high street. The high street is a place where local people can do their shopping, have a coffee, go for a walk around the cemetery, go to the library, the cinema, etc. It is therefore like a village and these proposals will fundamentally change that character. 3. I have lived in West Norwood for over 30 years and have seen it grow as a local community, in which residents and businesses have come together, This has been particularly noticeable over the last few years, with the blossoming of local community groups and initiatives, like West Norwood Feast. It is therefore essential that there is full consultation and engagement with local community groups BEFORE these proposals are launched. 4. Any such development based on these proposals is likely to take several years. It will therefore affect other local businesses and cause a substantial deterioration in West Norwood town centre. <p>Please take these points into account and take sites 18 and 19 out of the plan so that there can be full and meaningful consultation and engagement with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1288	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community	Please refer to the general response to representations made by individuals and businesses.
Individual	R1290	Other	I a resident of west norwood and I demand the proposals for site 18 & site 19 are removed from this consultation and new plans are developed with the local community.	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Individual	R1291	Other	Registering huge concerns about the plans to completely change west norwood . Proposed building plans running between knollys road and leigham Vale are entirely out of character with the Local area and with have a significant and detrimental impact on an already broken road system. The air quality, traffic, parking, frustrations and use of inappropriate language by stuck drivers are already at an unacceptable level outside a primary school - the addition of hundreds more residents and vehicles will further exacerbate this situation. The infra structure of the Local area cannot cope with the planned expansion. The physical geography does not support the planned expansion. It is outrageous that Lambeth Council seem to be trying to push through a damaging plan without proper consultation. The proposal is not acceptable no r is the manner in which it seems to be foisted upon residents.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1295	Other	As a Lambeth resident for the last 20 years and an active member of the west Norwood community I would like protest the proposed plans for site 18 and 19. I am very much in favour of the redevelopment of all or part of the proposed sites and would like to see the creation of affordable new homes and commercial sites but the proposals for both sites are insensitive to their surroundings and would ruin the landscape of our community. I would urge council colleagues to consult more widely with the community including local businesses, schools and other groups as well as individuals and families before deciding on the best use of these sites.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1296	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1300	Other	I am a resident of West Norwood. These proposals are ridiculous and will completely destroy the character of the area in which I have lived for over 40 years. I cannot believe that these proposals will be taken seriously. They will be extremely detrimental to West Norwood. I surmise that the only people to benefit will be the developers whose pockets will be lined at the expense of the people who live here.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1301	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community for something more fitting to our area.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1303	Other	I wish to object to the development of site 18 and 19 for the following reasons:- It would destroy the character of the local area. The sites are not suitable for affordable housing There will be destruction of wildlife and specially protected species	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			There will be less parking (already a problem) and traffic chaos Businesses will close and it will cause local job loss. Please register my objection to this monstrous development planned.	
Individual	R1304	Other	<p>Me and my family have lived and worked in West Norwood for over 20 years and do not want to see the sort of high rise cookie cutter development that you are proposing to build.</p> <p>We understand the need for more housing and redevelopment but there is not enough consultation going on and many people have no idea what you are planning.</p> <p>I am also worried at losing yet more existing businesses from scaffolders to large retailers like B&q who have shown incredible loyalty to our area.</p> <p>I would suggest you stop acting like corporate developers and try showing models, drawings etc in local highly visible locations, seek more views, and show openness and responsiveness to feedback.</p> <p>We do not want a corporate sort of architecture as witnessed by the new buildings down at Brixton, but buildings that are full of imagination and of human scale.</p> <p>Please halt your plans.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1306	Other	I am a resident of West Norwood and I demand that the proposals for Site18 and Site19 are removed from this consultation. The current plans would destroy the character of the area and would threaten local homes and businesse. New plans should be developed with proper consultation with the local community and follow the Council's planning rules.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1307	Other	<p>I am a resident of West Norwood and I have had the pleasure of being a part of a wonderful vibrant community here. Part of the beauty of West Norwood is the diversity it has, and the local businesses are a true reflection of this.</p> <p>The proposals for Site18 and Site19 would decimate the unique charm this area has. It would be a deathly blow of gentrification for the area, crushing legitimate businesses we are proud to support, robbing us of an eclectic highstreet and ultimately exacerbating the heavy traffic in this area.</p> <p>I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1309	Other	<p>I'd like to express my concern in the plans that have come to my attention about the development plans that are to take place on Site 18 and Site 19 in West Norwood.</p> <p>Having been a long-standing member of this community, the proposed removal of some much-loved institutions and some of the larger stores that the local people depend on would be catastrophic for so many.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>The area is currently one that prides itself on having a local identity despite being situated in one of the most populated cities in the world. The introduction of this new development not only strips much of the life out of the area and our high street but as there is no clear provision for any of the development to serve the local community, providing opportunities it will lead to a decay of what gives this area such a unique identity.</p> <p>The impact of erecting high buildings in the heart of the high street would be felt not only in the immediate area but also further afield. This could potentially lead to more of the same and before we know it, there is no clear views of the wonderful greenery that we are so lucky to have in Lambeth. This could have adverse effects on the families and communities and on the mental health of those that like to wander the streets for respite from the hustle and bustle of the city.</p> <p>While I understand that things cannot remain the same forever, I would urge the developers to consult the local community and to work in tandem to create something that works and is long-lasting. It would be a shame for this planned work to have an irreversible impact on the local community when to my knowledge there has been zero effort made to work towards a goal together.</p>	
Individual	R1311	Other	<p>As a local resident & business owner, the lack of communication over this proposal is shocking.</p> <p>The area is already a big mess, and dangerous to the residents & local school children.</p> <p>Hitherfield school is the closest school, with many children travelling everyday, the traffic is horrendous and often brawls breakout in front of the children as commuters are stuck without moving in traffic</p> <p>The pollution is disgusting, with the highest levels of pollution in Lambeth Children are the worst at risk as the pollution is high yet when lower to the ground</p> <p>This must not go ahead</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1313	Other	<p>I am writing to strongly object to the inclusion of these site plans that have been developed without any input or consultation with the local community.</p> <p>1. They are high-rise developments, geared to maximising profit for the private developers at the expense of the local community. These sites so close together are wholly out of proportion to surrounding streets and will break the community in two. They are geared for inner city transient living and do not answer the needs of the community for long-term family housing, with and development of small-scale local services</p> <p>2. These plans require a complete demolition and re-build - highly damaging to the environment and community. We should be</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>encouraging small-scale organic developments with full community participation - not a big developer's paradise imposed on us by companies without any regard or interest in the local community.</p> <p>3. The proposed height, and tower blocks will dominate over the surrounding streets and encourage all new developments to replicate or exceed these heights - already over the planning limits.</p> <p>4. Norwood High Street will be obliterated as a local shopping street - losing successful and essential local shops. This will be highly damaging to the community.</p> <p>Please remove these identikit and totally unsuitable 'visions' from the site allocation plan and start consulting meaningfully with the local community about what we really need.</p>	
Individual	R1315	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1317	Other	<p>I am writing to object in the strongest terms against both of the proposed site developments numbers 18 and 19 in West Norwood. Whilst there may be a need for housing in the borough, both developments are grossly over sized, far too tall and would completely destroy the nature of the shopping high street in West Norwood. It would destroy a large number of local businesses and take away many useful local resources such as a petrol station and a B&Q. I cannot understand how Lambeth Council can even contemplate such developments.</p> <p>I hope that the strength of local opposition will make the council change it's mind and reject the proposal.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1319	Other	<p>As a local resident directly affected I am very concerned by the proposals for sites 18 and 19, and unhappy at the lack of consultation around the development of these proposals to date.</p> <p>It is extremely difficult to see how many of the assertions in the consultation literature and be realised. Claims such as "the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth" seem far fetched for the proposal for these sites, and the suggestion for site 19 that the development vision might somehow contribute to more urban food growing sounds absurd - what could be the basis for such a claim?</p> <p>Please reconsider a more realistic plan for the site.</p> <p>I note the documentation says no unacceptable overlooking of neighbouring areas should occur. Given the site is already elevated this will be difficult and encourage you to consider Harpenden Road as neighbouring (and not to suggest that railway line means it does not</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			neighbour the site). Thank you for considering these comments	
Individual	R1320	Other	I am writing regarding the site 18 and 19 development plan (Knolly's Yard). The community has not been properly consulted and I think the plans need to be removed and a proper consultation process needs to be undertaken. The community are not against additional housing but it's outrageous that there's been no consultation. This will bring substantial change to our community and I believe existing plans should be removed.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1324	Other	I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community. What does the phrase 'Cooperative council' even mean if all these decisions are made without actually asking what the local communities want. This is really bad. Lambeth seems to have lost its mind completely while gambling away the few sympathies still left within the local communities. The proposals for site 18 and 19 are a disgrace to say the least. The proposed high rise and high density developments are completely out of kilter with the low-rise character of West Norwood and its surrounding areas. The traffic is bad enough as it is. How are all the additional residents meant to travel to and from work? Wherever I cycle West Norwood is always one of the worst areas in terms of car traffic, with the main road completely flooded with cars and very little space to cycle. This is the opposite of sustainable travel. What about all the additional expected air pollution due to the housing demolitions and increased use of individual car traffic? Air pollution is already above legal limits along the main high street while Lambeth seems to have no interest in providing air quality measuring tools as this would testify the illegal nature of the air we all breathe. A group of local people including myself tested the NO2 concentrations in 15 locations in 2019 and 9 out of 15 locations trespassed legal limits. What about the embodied carbon of all the existing buildings that are planned to be demolished? What about the increased fire safety risks of high rise buildings? There seems no strategic thinking about all these topics.	Please refer to the general response to representations made by individuals and businesses.
Individual	R1324	Other	Any of these high-density proposals are excused by the housing target figures that have to be achieved by each council. As far as I am aware Lambeth is matching these target figures already thanks to all the high-	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
			<p>rise development in places like Vauxhall, an area now unrecognisable with its former character. The people of West Norwood have no appetite to be steamrolled over by these outrageous proposals that never seem to fulfill on their promise to provide meaningful numbers of truly affordable homes.</p> <p>The proposal contradicts the council's own planning policy when referring to the existing suburban character surrounded by green spaces and low density housing stock but the rules don't seem to apply in this case.</p> <p>As somebody who truly cares about the area I live in, I object these proposals in the strongest terms</p>	
Individual	R1325	Other	<p>I object to the proposals for sites 18 and 19 in West Norwood. These should be removed from the consultation and Lambeth should go back to the drawing board to develop new plans in partnership with the local community.</p> <p>As a West Norwood and Lambeth resident I am well aware of the shortage of decent affordable and social housing in the Borough, but I question whether a development with buildings which would dwarf the entire neighbourhood and are unlikely to be practical for the housing needed are going to help solve any problems. Further, it is unclear what Lambeth is doing to improve its current housing stock for the benefit of existing residents, and ensuring that this is updated to support Net Zero targets. Has Lambeth looked at vacant properties within the Borough that could be retrofitted to meet both housing shortfalls and Net Zero standards instead? It seems that this is an exercise in turning a normal locale into a huge money generator for Lambeth with little regard for the people that need the Council's help.</p> <p>The impact on existing infrastructure and services is not sufficiently considered in the proposals and, with additional residences of this size in a small locale, this would be significant. As a Lambeth resident I want to see regeneration but for the people who need it, not to line the pockets of developers.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1326	Other	<p>I am a resident of West Norwood and I demand the proposals for Site18 and Site19 are removed from this consultation and new plans developed with the local community.</p> <p>You should really put money, time, and effort into improving current accommodation and renovating unused buildings into housing that is actually affordable.</p>	Please refer to the general response to representations made by individuals and businesses.
Individual	R1327	Other	<p>I am a resident of West Norwood and I demand that the proposals for sites 18 and 19 be removed from this consultation and new plans developed within the community.</p>	Please refer to the general response to representations made by individuals and businesses.

Officer Response to Reg 18 Representations: Site 18 – 300-346 Norwood Road SE27

Respondent	ID	Draft SADPD Section	Comment	Officer Response
Marina Ahmad London Assembly Member (Labour & Co-operative)	R1329	Other	<p>I write with my comments on the SADPD Site 18 and Site 19 proposals. I am commenting only on these two sites at present as constituents have contacted me directly about them.</p> <p>Site 18</p> <p>I fully appreciate the need for housing in the borough. However, having visited the area and spoken to community representatives, I am concerned that there appears to have been no discussion or interaction with local residents, businesses, ward councillors or any of the established and long standing community groups. Given the size and complexity of the proposal for Site 18, I would have expected much greater local engagement. I believe the process relating to this particular site should be reset and revisited at a later stage with meaningful involvement from the local community in its widest sense.</p>	<p>The purpose of the SADPD is to set a vision for Site 18 which outlines the basic parameters that should guide any future development of the site. Such parameters include land uses and their quantum as well as indicative heights of buildings. The SADPD is not a development proposal for the site. Development proposals on any of the parcels within the site will be put forward by applicants in due course and follow the standard planning application process.</p> <p>The proposed site allocation builds up on previous work including the preparation of the 2007 Unitary Development Plan (UDP 2007), the production of the 2009 Masterplan, and the West Norwood and Tulse Hill: A Manual for Delivery, published in 2017, which provided a framework to guide the future development of the site.</p> <p>Previous pieces of work and other consultation work in West Norwood, have provided an extensive and valuable insight on local community aspirations and priorities, such as a desire to support the growth of the town centre and local businesses, to provide new mixed tenure housing, to improve public realm, pedestrian and cyclist permeability and public transport accessibility. This intelligence has informed the content of the SADPD for Site 18.</p> <p>Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.</p> <p>At the end of the consultation period, the council organised three targeted stakeholder engagement workshops with representatives of the community and stakeholder groups that had submitted responses to the Regulation 18 consultation on draft Sites 18 and 19 in West Norwood/Tulse Hill. These were held over a six-week period in October and November 2022. These workshops provided an opportunity for Council officers and members to explore further the points raised in the Regulation 18 representations with local representatives. These workshops have helped inform the Council's consideration of the Regulation 18 consultation responses received and the resulting content of the Proposed Submission Version SADPD for Site 18.</p>

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R0001	Other	<p>As stated in the comments submitted on behalf of the residents of Baytree Road and Porden Road, the massing of the 16m southern wing results in a pinch-point along the boundary with Baytree Road. This massing should be pulled back in this location to provide greater separation distances with properties on Baytree Road. It should be pulled in from the west and the south.</p> <p>However, in addition to this, as can be seen from the following supporting photographs and land registry, the boundary with the properties on Baytree Road is not the straight line suggested by the evidence. The property at 22 Baytree Road incorporates some extra land, in a wider semi-circle, rather than a straight line. Not only is this a pinch point with the proposed outline for a new building, but this is, even more the case, as the boundary is even closer than the evidence map on the allocation suggests.</p> <p>The massing should be pulled even further in this location to provide sufficient separation distances.</p>	<p>It is accepted that there is an error to the boundary. This has been amended on all maps.</p> <p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Support for the response submitted on behalf of Residents of Baytree Road and Porden Road is noted. Please see Representation R0324 for a full response.</p>
Individual	R0001	Evidence	<p>In addition, the boundary as set out in this evidence does not reflect the current boundary with the properties on Baytree Road. Part of the land included in the allocation is owned by 22 Baytree Road.</p> <p>The massing of the 16m southern wing results in a pinch-point along the boundary with Baytree Road. However, because the boundary is not shown accurately, this pinch point is even more significant.</p> <p>This massing should be pulled back in this location to provide greater separation distances with properties on Baytree Road. It should be pulled in from the west and the south.</p> <p>Buildings should only step down away from the Acre Lane frontage, not up - and heights of 32m and 16m are not acceptable, and out of context with this area.</p>	<p>The massing of the indicative approach has been revisited and tested for their daylight / sunlight impacts. The error in the boundary is noted and maps in the SADPD and evidence document have been corrected. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential 	Noted.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			M&W OFFICERS RAISE NO OBJECTION M&W officers have reviewed the consultation information and have no further comments to make.	
Natural England	R0163	General	Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.	Noted.
Residents of Baytree Road and Porden Road	R0324	Evidence	The approach to focussing any taller buildings to the Acre Lane frontage is welcomed; however, the 32m wing (centre of the site) and 16m wing (south of the site) as shown in Figure 11 are not acceptable. The building should only step down away from the Acre Lane frontage, not up. 32m is considered to be out of context with the area. The massing of the 16m southern wing results in a pinch-point along the boundary with Baytree Road. This massing should be pulled back in this location to provide greater separation distances with properties on Baytree Road. It should be pulled in from the west and the south. Whilst the document states that "best practice separation distances" have been considered, no clarification on the distances is provided. A minimum of 21m should be provided to any facing windows. In general terms, any massing at the south of the site should be no taller than the properties on Baytree Road, which are noted as being 8m and 9m in height. A development in very close proximity at 16m (double many existing properties) would clearly be overbearing, resulting in issues relating to outlook, increased sense of enclosure and loss of privacy. This part of the proposed development needs to be reconsidered. Windows/balconies should be minimised on the southern elevation to avoid mutual overlooking and loss of privacy. Any balconies should be directed over the podium garden. Overlooking into the private gardens of properties along Baytree Road also needs to be avoided. In respect of the 'unloading yard' and 'back of house + plant', these should be enclosed areas to avoid noise breakout and harmful disturbance to residents on Baytree Road.	The indicative approach in the evidence document has been revisited and re-tested to ensure that the daylight / sunlight and amenity impacts on neighbours are not unacceptable. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). There is no policy basis for requiring a separation distance of 21m. The Site Allocation wording has been amended to encourage the enclosure of the retail service area in order to protect the amenity of neighbours.
Mums for Lungs	R0501	Site Allocation Policy	We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document.	One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings.</p> <p>As acknowledged by Lambeth cabinet last November, “Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough.” Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document.</p> <p>Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.</p>	<p>generation in buildings and area regeneration schemes’. These strategic overarching principles are also applicable to the SADPD PSV.</p> <p>The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy SI1. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.</p> <p>The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth’s Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council’s work.</p>
Mums for Lungs	R0501	Transport	<p>Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough.</p> <p>We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?</p>	<p>Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.</p>
Mums for Lungs	R0501	Transport	<p>In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.</p> <p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It’s equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p> <p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth</p>	<p>In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking.</p> <p>Other London Plan policies will be applicable, such as Policy T1 ‘Strategic approach to transport’, T2 ‘Healthy streets’ and T5 ‘Cycling’, that set the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			council so that they become a tangible, positive reality for everyone living and working in the borough.	
Individual	R0569	Other	<p>We acknowledge and support Lambeth's policy objectives for this site, which is currently underutilised and unattractive. It clearly has the potential to provide additional housing and offer an improvement to the urban landscape through higher quality architecture. We also welcome the recognition of the sensitivity to safeguarding conditions for adjacent housing, and the principle of differential stacking, so as to reduce the risks of overlooking and undue dominance over existing adjacent housing. However, we believe the actual proposals in the SADPD as they stand will lead to an over-dense and overbearing development in relation to existing local housing, largely due to excessive height and massing. The general setting for this site is suburban. Acre Lane is a local road connecting Brixton with Clapham, not a main arterial route such as Brixton Hill. Existing storey heights along Acre Lane - including those still under construction at the junction of Acre Lane/Baytree Road – do not extend to more than 6-7 storeys and are mostly lower than this, reflecting the predominantly residential nature of the locality, albeit including shops and other commercial premises. Taller buildings in the area are almost entirely restricted to Brixton Hill, reflecting the previous history of development over the past 150 years.</p>	<p>Support for the objectives of the Draft SADPD is noted. It is accepted that the indicative approach and resultant vision is taller than development in the context. However, the high accessibility of the site and its proximity to the town centre justify such an approach. The indicative approach in the evidence document has been revisited and tested to ensure that no unacceptable impacts to neighbours. The Indicative approach is a tool to assess site capacity and not a detailed proposal. A detailed design would be prepared by the applicant and their architect at application stage.</p>
Individual	R0569	Other	<p>The proposals envisage storey heights for the residential elements significantly higher than any existing development along Acre Lane. But there is also an apparent ambiguity in the statements in the SADPD about storey heights – are the proposed heights for the residential elements in addition to, or net of, the height of the supermarket element?</p> <p>Even if the heights quoted in the SAPD are net of the supermarket element, they are too high for this context and will be overbearing in relation to the existing residential settings in Baytree Road including Arlington Lodge, and particularly for Porden Road, which are all, to varying degrees, already negatively impacted by the additional height recently added to the Ivor House site, as well as by the adjacent recent developments at Somerset House, Maugham House and the Civic Centre.</p> <p>As illustrated in the digital images provided in the Evidence document, this will be a massive, insufficiently articulated building at the Acre Lane elevation. We note that no equivalent view is provided to show the appearance of the Indicative Approach from the adjacent housing (Baytree Road, Porden Road and Arlington Lodge) - a strange omission given the statements in the SADPD about the intended safeguards for neighbouring properties. We cannot see how these safeguards can be</p>	<p>It is accepted that the indicative approach and resultant vision is taller than development in the context. However, the high accessibility of the site and its proximity to the town centre justify such an approach. The indicative approach in the evidence document has been revisited and tested to ensure that no unacceptable impacts to neighbours. The Indicative approach is a tool to assess site capacity and not a detailed proposal. A detailed design would be prepared by the applicant and their architect at application stage.</p>

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			secured (e.g. in respect of overlooking) given a development of the storey heights proposed. This seems anomalous in the light of the storey heights permitted for the redevelopment of the Olive Morris House site on Brixton Hill, where the storey heights match those of the existing adjacent 1930's blocks. Bearing in mind the high risk that any developer will almost certainly seek to push beyond the recommended limits in the SAPD when submitting a planning application – and recognising that, with the right to appeal, there could be no guarantee that these limits would ultimately be upheld – it is important that these are pitched more conservatively at the outset. As along the rest of Acre Lane, the storey heights of any proposed development on the Tesco site should be limited to a maximum of 6/7 storeys from ground level, reflecting the status quo of the existing townscape, as well as those currently under construction.	
Individual	R0649	other	The massing of the 16m southern wing results in a pinch-point along the boundary with Baytree Road. This massing should be pulled back in this location to provide greater separation distances with properties on Baytree Road. It should be pulled in from the west and the south.	The indicative approach has been revisited in relation to the Baytree Road relationship. The indicative approach is not a development proposal but a tool for assessing the site's capacity, and separation distances will be assessed at the time a planning application is brought forward against all relevant Development Plan policies, in particular Local Plan Policy Q2 'Amenity'.
Individual	R0649	other	In respect of the 'unloading yard' and 'back of house + plant', these should be enclosed areas to avoid noise breakout and harmful disturbance to residents on Baytree Road.	Accepted. Wording has been added to the policy to encourage the full enclosure of retail servicing areas.
Montagu Evans on behalf of HSBC	R0869	Site Allocation Policy	Replacement supermarket with residential. The site has potential to accommodate approximately circa. 420 to 470 self-contained residential units. We do not see any reason to limit the development to 170 units at this stage. In accordance with the NPPF, new development, including that on previously developed land, should seek to maximise the scale, form and density of the site given the town centre location. Initial feasibility work undertaken by our client indicates that the Site could likely accommodate a range of circa. 420 – 470 dwellings, subject to detailed design.	The council has revisited the feasibility work, daylight & sunlight, massing which indicate an increased number approx 180 -210 units can be accommodated. It is envisaged the site can provide townscape improvements and urban greening. The detailed application will be subject to testing against all relevant development plan policies including policy Q22: Conservation areas and policy Q2: Amenities.
Montagu Evans on behalf of HSBC	R0869	Site Allocation Policy	Development will be supported where it can be demonstrated that it minimises and seeks to avoid should cause no harm to the significance (including setting) of heritage assets, in particular to the setting of Lambeth Town Hall in views from Coldharbour Lane, which is identified as significant in the Brixton Conservation Area Statement. Any harm to the significance of a designated heritage asset should require clear and convincing justification and should be weighed against the public benefits of the proposal. [This is consistent with the tests within the NPPF when considering the impact of a proposed development on the	Not accepted. Development will be supported where it preserves or enhances the significance (including setting) of heritage assets, in particular to the setting of Lambeth Town Hall in views from Coldharbour Lane, which is identified as significant in the Brixton Conservation Area Statement. In line with the NPPF, any harm to the significance of a designated heritage asset requires clear and convincing justification and may be weighed against the public benefits of the proposal.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			significance of a heritage asset, which at paragraph 202 allows for development that harms designated heritage assets where it is outweighed by the public benefits of the scheme].	
Montagu Evans on behalf of HSBC	R0869	Site Allocation Policy	<p>The site is not appropriate for a tall building development, defined by Local Plan Policy Q26 as above 45m in this location. Should tall buildings be proposed, they would be subject to addressing Local Plan Policy Q26 parts A and B and London Plan Policy D9. [The Hillingdon High Court judgment clarified that there is no wording that indicates the locational requirements in Part B are gateways or preconditions to Part C, and the proposals should be determined with regards to Policy D9 and development plan as a whole. See https://www.bailii.org/ew/cases/EWHC/Admin/2021/3387.html paragraphs 72 to 88]. Development should address the following principles:</p> <ul style="list-style-type: none"> • reinstate a building line to Acre Lane • introduce animation and pedestrian entrances to Acre Lane • use materials and massing which responds positively to local distinctiveness • ground floor residential units should all be provided with adequate defensible space, especially those fronting Acre Lane. 	Partially accept. Clarification that a tall building in this location is defined as 45m or above has been added to the Site Allocations Policy. Reference to the Hillingdon High Court Judgement is noted. All proposals will be judged on their merits against all relevant development plan policies including London Plan Policy D9 and Local Plan Q26 in regards to tall building and it is not considered necessary to specify this in this instance.
Individual	R1487	Context Map	The boundary with Baytree Road incorporates some land owned by 22 Baytree road, so the proposed building outline will be much too close to the boundary! Needs moving back, please.	The error in the boundary is noted and maps will be corrected. The indicative approach in the evidence document has been revisited and tested to ensure that no unacceptable the neighbour impacts result. The indicative approach is not a development proposal but a tool for assessing the site's capacity. Separation distances will be assessed at the time a planning application is brought forward, against all relevant Development Plan policies, in particular Local Plan Policy Q2 'Amenity'.
Individual	R1491	Other	This should ideally be kept at the around the height of the neighbouring houses.	Comments noted.
Individual	R1492	Site Allocation Policy	This is a suburban site, surrounded by mostly residential and some low rise commercial properties. Acre Lane is a local road connecting Brixton with Clapham, not a main arterial route such as Brixton Hill. Existing buildings on Acre Lane - including that under construction at the junction of Acre Lane and Baytree Road – are no more than 6-7 storeys, mostly much less. On Baytree Road it is no more than two story terraced houses. Taller buildings in the area are almost entirely restricted to Brixton Hill, reflecting the previous history of development over the past 150 years. The proposals includes heights for the residential elements that are significantly higher than any existing development along Acre Lane. It is also unclear whether the heights quoted include or are on top of the supermarket element. Even if the	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). The site is not suitable for a tall

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			supermarket element is included within the quoted heights, the proposals are too high for this context and will be overbearing in relation to the existing residential settings in Baytree Road including Arlington Lodge, and particularly for Porden Road, which are all, to varying degrees, already negatively impacted by the additional height recently added to the Ivor House site, as well as by the adjacent recent developments at Somerset House, Maugham House and the Civic Centre. I'm also very suspicious that if this proposal goes ahead then a developer will take what is set out here and put in proposals that are even bigger. The proposal should be modified to be no higher than existing Acre Lane developments, and clearly expressed as a maximum that could be permitted.	building, which means that in this location the maximum height would be 45m. However this in itself is not considered acceptable, and the heritage sensitivities of the site would be a material consideration in assessing any application that comes forward.
Individual	R1629	Vision Map	The site seems to be overly dense and we need specific details of the maximum heights.	The indicative capacity has been assessed with regards to the site's constraints, ensuring that the indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban/urban locations. Detailed proposals will be assessed against all relevant development plan policies at the time an application is submitted. As the site is identified as not being suitable for tall building, and a tall building in this location would be considered to be 45m or above (as set out in Lambeth Local Plan Policy Q26), there is defined maximum height. This height would not in itself be considered acceptable, as the heritage sensitivities of the site are a material consideration in assessing the acceptability of any proposed development.
Individual	R1747	Vision	I totally disagree with this project : - Brixton Hill density is already very high compared to the rest of London. Do you really want the area to become even more overcrowded? - Brixton has a lot of 1 to 3 bedroom flats but does not have enough houses. Given. There is already a real shortage for family housing, do you really want to push families out of Brixton any further? What about rather building 3bed houses with small gardens?	Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten-year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The mix of homes will be fully considered at the time a planning application is brought forward on the site. Local Plan Policy H4 'Housing size mix in new developments' will apply, which acknowledges the need for family accommodation, in particular family-sized affordable homes.
Individual	R0001	Other	Just as an initial point of note - the boundary line is incorrect. I live in [Redacted], and the boundary shown currently runs through my garden. I am sure that this will have an impact on the proposed development so would be great to speak with someone as a matter of urgency. In addition to comments on the SADPD consultation website, I wanted to provide evidence to support my statement that the boundary wall as	Accept that there is an error to the boundary. This will be amended in all maps. Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see representation R0324 for a full response.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			marked on the evidence map is incorrect. I fully support the comments from the residents of Baytree Road and Porden Road, but wanted to provide further evidence of why the massing should be pulled in.	
Individual	R0001	Vision	I wanted to express disappointment that this allocation was not shared with members of the street who do not have access to the internet, and that notification wasn't provided through the post. This is an area with residents from a whole range of backgrounds and at different stages of life, and this decision was not inclusive of everyone in the area. It is requested that we be informed of any future consultations and would welcome a meeting with Council officers to discuss our comments and concerns, to ensure any future allocation protects existing residents.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.
Individual	R0001	Vision Map	I again endorse the comments that can be found at https://bit.ly/3uXtLaU . Any potential allocation should reinforce maximum capacities and maximum heights to be specifically noted in any allocation, to prevent any future development of exceeding these. This is especially of concern as this development is in a suburban setting.	Support for the response submitted on behalf of Residents of Baytree Road and Porden Road is noted. Please see Representation R0324 for a full response.
Individual	R0001	Vision Map	In addition, along with objecting to Baytree Road being used to service the replacement supermarket, robust measures are needed to ensure that vehicle numbers on the neighbouring residential streets aren't increased, and that residents of the new developments are restricted in accessing local parking permits.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane. In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street
Transport for London Spatial Planning	R0312	Other	We do not accept the claim that 'A replacement supermarket of equivalent net sales area to the existing store is expected to need an appropriate level of parking to operate effectively'. This is contrary to the statement that London Plan and Local Plan parking standards will apply which we support. The site is in a major town centre and has a PTAL of 6a and so it is required by the standards to be car free. Data from the 2011 census shows that 63.9% of households do not have access to a car within 800m (10-minute walk) of the site and the density of the bus network means that car-free travel is very easy for those travelling from further afield. The site also forms part of a Low Traffic Neighbourhood. Given the age of the data, and evidence that car-ownership reduced dramatically within two years of implementing an LTN, current car ownership is likely to be even lower. For all of these reasons, any redevelopment should only provide Blue Badge parking. Town centre retail in a location with a high level of connectivity does not require car	A reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. However, some car parking will be reprovided, with a focus on disabled parking and electric vehicle charging

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			parking. The provision of parking can add to development costs and uses up valuable space that can be used to optimise development density or to enhance the public realm. Additionally, evidence has shown that town centre vibrancy and vitality is better supported by welcoming public realm and enjoyable places to dwell, both of which are undermined by encouraging access by car.	
Residents of Baytree Road and Porden Road	R0324	Vision	This response is provided on behalf of residents of Baytree Road, which immediately adjoins the proposed allocation site to its Western and Southern boundaries, and Porden road, which immediately adjoins the proposed allocation site to its Eastern boundary. Whilst the residents are generally supportive of the need for new housing, the current consultation is limited in detail and has not given full regard to the existing housing – the domestic, two storey scale of those properties immediately adjacent on Baytree Road and the potential impacts a development of the proposed scale could cause. It is considered that a reduction in the scale and footprint of the development to the centre and southern parts of the site is required in order to respect the surrounding context and the amenity of residents of Baytree Road.	The indicative approach in the evidence document has been revisited and re-tested to ensure that the daylight / sunlight and amenity impacts on neighbours are not unacceptable. Any applicant would have to develop a proposal that met all the relevant neighbour amenity policy requirements. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Residents of Baytree Road and Porden Road	R0324	Vision	Furthermore, measures should also be put in place to ensure Baytree Road is not used by servicing vehicles, which would result in clear safety and highway obstruction issues. More detailed comments are provided in our further answers. It is requested that we be informed of any future consultations and would welcome a meeting with Council officers to discuss our comments and concerns, to ensure any future allocation protects existing residents.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane
Residents of Baytree Road and Porden Road	R0324	Site Allocation Policy	The Policy includes a particularly broad housing range of 120-170 self-contained residential units. It is not clear if the Council has undertaken any specific scheme density testing as part of this proposed allocation; however, this would equate to approximately 141 units per hectare (in addition to a large supermarket) on a site that is on a boundary between an urban and suburban setting. This is considered to be overly dense and a reduction in the housing target is required. It is also considered that the capacity within any future allocation should be expressly noted as a maximum capacity to avoid a more substantial development from coming forward. We support the Council's statement that "the site is not appropriate for a tall building development". This reinforces the need for maximum capacities and maximum heights to be specifically noted in any allocation, to prevent any future development of exceeding these.	The Site Allocation policy sets out the parameters for development of the site, based on high-level testing of the optimum development capacity that could in principle be accommodated on the site, using a design-led approach in accordance with London Plan Policies D1B(3) and D3. Applicants and their architects will need to undertake a further detailed assessment of site capacity when designing proposals for submission as a planning application, informed by the parameters set out in the site allocation policies and other relevant policies in the development plan.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
Residents of Baytree Road and Porden Road	R0324	Site Allocation Policy	<p>We strongly object to the Council's statement that: "Servicing of the replacement supermarket should be accessed from Baytree Road rather than from Acre Lane". Baytree Road is a solely residential street, which is restricted in width due to resident parking on both sides. The street is heavily parked and incorporates a bend to its northern end. It further includes speed bumps and a 'no right turn' at its southern end, which limit its use as a cut-through between Acre Lane and Brixton Hill. It is further home to principally family housing.</p> <p>The use of Baytree Road by servicing HGV vehicles is simply not compatible with safety and realistic traffic flow. It presents a clear highway safety issue, together with a residential amenity issue due to the anti-social hours of deliveries causing noise and vibrations. Servicing access should only be taken from the junction with Acre Lane and servicing vehicles should not travel along Baytree Road, which should be set out in any allocation wording.</p> <p>A detailed Servicing Management Plan should be included within any application, which should include restrictions on delivery numbers/times/vehicle types and the robust measures to prevent use of Baytree Road by delivery vehicles. This could include vehicle width restriction bollards.</p> <p>Since the developments adjacent to the Civic Centre, local residents have found it difficult and at times impossible to find parking spaces. In particular this is a problem on Porden Road and increasingly on Baytree Road. The new development on Acre Lane and replacement for Olive Morris House are likely to make this situation worse. This situation needs to be improved rather than worsened for the residents of Baytree Road, Porden Road and the surrounding area by the development on the Tesco site. Any scheme should include restrictions for future residents and users of the development from parking on these streets. The planning application should include a Transport Statement and Travel Plan including parking densities and based on a statistical survey of current traffic density and parking utilisation.</p>	<p>The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer.</p> <p>The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.</p> <p>In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.</p> <p>Any future planning application will be accompanied by a Transport Assessment, along with draft Delivery and Servicing Management, Construction and Environmental Management and Travel Plans. Full Plans will be secured and assessed via appropriate planning conditions.</p>
Residents of Baytree Road and Porden Road	R0324	Site Allocation Policy	<p>We support the Council's statement that: "The scheme should be designed to cause no unacceptable impacts on existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise pollution. Particular regard should be paid to the relationship with sensitive residential neighbours on Baytree Road, Porden Road and Arlington Lodge." However, this wording needs to be updated to fully reflect the requirements of Lambeth Policy Q2 Amenity, which also protects the "visual amenity" and "outlook" of neighbouring properties, in addition to the points noted in the above statement. Any future allocation should expressly require protection of all the matters</p>	<p>Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Compliance would not be limited to only the sensitive properties shown on the vision map.</p>

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>set out in Policy Q2, including the “visual amenity” and “outlook” of residents of Baytree Road. As part of any future application, we would expect to see a BRE compliant Daylight and Sunlight report, including assessment of:</p> <ol style="list-style-type: none"> 1. Vertical Sky Component (VSC) 2. Average Daylight Factor (ADF) 3. Annual Probable Sunlight Hours (APSH) 4. No Sky Line (NSL). <p>We would also expect an overlooking analysis, which includes measures and planting on the boundary of Baytree Road to prevent overlooking.</p>	
Residents of Baytree Road and Porden Road	R0324	Vision Map	We support the Council's identification of the northern side of Baytree Road as a 'sensitive residential neighbour'; however, the southern side should also be identified given the proximity to the site.	Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Compliance would not be limited to only the sensitive properties shown on the vision map.
Residents of Baytree Road and Porden Road	R0324	Vision Map	The Map identifies that the servicing route is to be retained. The arrow exiting the site should be extended northward to Acre Lane, to demonstrate the requirement is for vehicles to take entry and exit from Acre Lane, and not the domestic Baytree Road.	Accepted. The Vision Map will be amended to clarify vehicle routes in to and out of the site, and that vehicles exiting the site should turn right onto Acre Lane avoiding Baytree Road.
Residents of Baytree Road and Porden Road	R0324	Vision Map	Trees of amenity value are identified; however, the Map should expressly note that these are expected to be 'retained'. We would also suggest that existing trees along the Baytree boundary be retained.	The retention of trees will be dependent on their health, condition and other considerations. For that reason, the Council does not wish to explicitly state that particular trees must be retained. An applicant would be required to undertake detailed arboriculture assessments when development any proposal and work up a scheme which retains trees in accordance with British Standard best practice. Policy Q10 in the local plan will apply when proposals are assessed.
Residents of Baytree Road and Porden Road	R0324	Context Map	The Context Map should include sensitive residential receptors and trees of amenity value for retention.	The retention of trees will be dependent on their health, condition and other considerations. For that reason, the Council does not wish to explicitly state that particular trees must be retained. An applicant would be required to undertake detailed arboriculture assessments when development any proposal and work up a scheme which retains trees in accordance with British Standard best practice. Policy Q10 in the local plan will apply when proposals are assessed.
Residents of Baytree Road and	R0324	Sustainability Appraisal	We would expect to see a Sustainability Statement submitted with any future application. We request that developers meet World Green Building Council guidelines on sustainable construction and that the proposed development meets the government's Build Back Greener	Any planning application that comes forward on the site will be assessed against development plan policies including Local Plan Policy EN4 'Sustainable Design and Construction' which requires a statement on sustainable design standards; and London Plan Policy SI 2 'Minimising

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
Porden Road			target for decarbonising all sectors of the UK economy to meet our net zero target by 2050. The site is currently dominated by tarmac and hardscape with limited green amenity and biodiversity. The new development should take the opportunity to improve this situation for new and existing local residents by exceeding the required Urban Greening Factor and by deploying a diverse mix of plant and tree species.	greenhouse gas emissions' which states that all major developments should be net zero carbon and sets out minimum standards for carbon reduction. Comments on urban greening are noted.
Individual	R0336	Other	<p>I am a resident of [redacted], adjacent to Tesco on Acre Lane, SW2. I wish to object to the broad building range of up to 170 residential units on the car park. The Council has already stated that 'The scheme should be designed to cause no unacceptable impact on existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise pollution. Particular regard should be paid to the relationship with sensitive neighbours on Baytree Road, Porden Road and Arlington Lodge'.</p> <p>I can't see how these units can be built without affecting my privacy (being overlooked), security of my home & after demolition & rebuild of the Civic Centre over previous years, the intrusive noise & pollution. I am also concerned about losing daylight in my home & garden which has already been diminished by the build of the Civic Centre & Maugham House.</p> <p>As 'a sensitive residential neighbour', I totally object to any new domestic build over the current 2 storey scale of the surrounding roads. Please also consider a reduction in the scale & footprint of this development to the centre of the site that then would not affect residents of Baytree or Porden Roads.</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. It has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R0550	Other	We are very supportive of the need for new housing and welcome many of the considerations laid out in the consultation documents. I live and work from home on [redacted], along with my partner and our housemate.	Support is noted.
Individual	R0550	Other	<p>If the development is to proceed, there are several specific concerns we would like to see addressed, including:</p> <ul style="list-style-type: none"> - building height - site capacity 	Comments noted.
Individual	R0550	Other	<p>- implications for parking, safety and traffic on Baytree Road</p> <p>Our street has a very supportive atmosphere with good relationships between neighbours - we have collectively developed this response, of which our household is fully supportive: https://bit.ly/3uXtLaU</p>	Support is noted. Please see Representation R034 for a full response. The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.</p> <p>Any future planning application will be accompanied by a Transport Assessment, along with draft Delivery and Servicing Management, Construction and Environmental Management and Travel Plans. Full Plans will be secured and assessed via appropriate planning conditions.</p>
Individual	R0550	Vision	Support the need for new housing and the potential improvements, but it needs to be done sensitively - particularly for the impact on parking, light and vehicle access on Baytree Road. I fully support the collective submission here: https://bit.ly/3uXtLaU	Comments noted. Support for the response submitted on behalf of Residents of Baytree Road and Porden Road is also noted. Please see Representation R0324 for a full response.
Individual	R0550	Vision	Support the need for new housing and the potential improvements, but it needs to be done sensitively - particularly for the impact on parking, light and vehicle access on Baytree Road. I fully support the collective submission here: https://bit.ly/3uXtLaU	<p>Support for the response submitted on behalf of Residents of Baytree Road and Porden Road is noted. Please see Representation [number] for a full response. The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer.</p> <p>The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.</p> <p>In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.</p> <p>Any future planning application will be accompanied by a Transport Assessment, along with draft Delivery and Servicing Management, Construction and Environmental Management and Travel Plans. Full Plans will be secured and assessed via appropriate planning conditions.</p>
Individual	R0550	Site Allocation Policy	Welcome the sensitivity towards Baytree Road - but have concerns about building height, vehicle access and other areas. I fully support the collective response here: https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Baytree Road and Porden Road is noted. Please see Representation R0324 for a full response.
Individual	R0550	Site Allocation Policy	Welcome the sensitivity towards Baytree Road - but have concerns about building height, vehicle access and other areas. I fully support the collective response here: https://bit.ly/3uXtLaU	<p>Support for the response submitted on behalf of Residents of Baytree Road and Porden Road is noted. Please see Representation R0324 for a full response. The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer.</p> <p>The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.</p> <p>In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.</p>

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
				Any future planning application will be accompanied by a Transport Assessment, along with draft Delivery and Servicing Management, Construction and Environmental Management and Travel Plans. Full Plans will be secured and assessed via appropriate planning conditions.
Individual	R0569	Other	Furthermore, the servicing proposals for the replacement supermarket will be impracticable, anti-social and (based on past experience and current practice) be potentially dangerous, particularly taking account of the new development under way at the junction of Baytree Road and Acre Lane which introduces new houses and apartments directly opposite the access point proposed.	<p>The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer.</p> <p>The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.</p> <p>The consented development at 41 - 45 Acre Lane (ref 17/03846/FUL) includes office space at ground floor opposite the existing service yard exit. This relationship would remain unchanged.</p>
Individual	R0569	Other	<p>The opportunity should be taken to move the vehicle servicing of the supermarket (for both entry and departure) to Acre Lane, rather than moving both to Baytree Road as currently envisaged in the SADPD. Baytree Road is a narrow (double-parked) residential street and having ingress/egress of large delivery lorries will exacerbate the existing conflict with vehicular and pedestrian traffic along the street, more so in view of the new residential block now under construction on the western side of the Baytree Road/Acre Lane junction (which includes houses directly facing the existing lorry departure point).</p> <p>Given the width of Baytree Road, HGV lorries exiting at this point already involves serious risk. There are frequent examples of damage to the gateposts, and lorries often block other vehicles – and pedestrians – using Baytree Road. As things currently stand, due to the small dimensions of the delivery area, lorries access the site from Acre Lane, but must then move into the Baytree Road exit, and partially across the road, to then reverse into the delivery bay. This is all clear evidence that the exit route for large delivery lorries has always been potentially dangerous and barely practicable. Making this the access point for deliveries coming in as well will simply make an existing problem even worse. The new proposals should therefore provide for a better-engineered solution than that currently proposed.</p>	<p>The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer.</p> <p>The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.</p> <p>Any future planning application would be accompanied by a Transport Assessment which should include an assessment of the suitability of all access points, using swept path analyses of the largest expected vehicles. The consented development at 41 - 45 Acre Lane (ref 17/03846/FUL) includes office space at ground floor opposite the existing service yard exit. This relationship would remain unchanged.</p>
Individual	R0574	Other	The reshape and build will affect my property as follows: [Link to R0324 collective response]	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response.
Individual	R0649	Other	We object to the re development above and out concerns are inter alia: 1. increase of vehicular traffic due to planned development which will disrupt the occupants of Baytree road a residential road	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer.

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.</p> <p>In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.</p>
Individual	R0649	other	<p>Effect on sunlight and light due to increased height. We support the Council's statement that: "The scheme should be designed to cause no unacceptable impacts on existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise pollution. Particular regard should be paid to the relationship with sensitive residential neighbours on Baytree Road, Porden Road and Arlington Lodge."</p> <p>However, this wording needs to be updated to fully reflect the requirements of Lambeth Policy Q2 Amenity, which also protects the "visual amenity" and "outlook" of neighbouring properties, in addition to the points noted in the above statement. Any future allocation should expressly require protection of all the matters set out in Policy Q2, including the "visual amenity" and "outlook" of residents of Baytree Road.</p> <p>As part of any future application, we would expect to see a BRE compliant Daylight and Sunlight report, including assessment of:</p> <ul style="list-style-type: none"> i. Vertical Sky Component (VSC) ii. Average Daylight Factor (ADF) iii. Annual Probable Sunlight Hours (APSH) 4. No Sky Line (NSL). 	<p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R0649	other	<p>We would also expect an overlooking analysis, which includes measures and planting on the boundary of Baytree Road to prevent overlooking.</p>	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p>
Individual	R0649	other	3. Increase in noise and disruption	<p>The impact of any demolition and construction will be considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan</p>

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
				Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming forward, as required by Local Plan Policy T7.
Individual	R0649	other	Concern that Baytree Road will be used by servicing vehicles, which would result in clear safety and highway obstruction issues. I strongly object to the Council's statement that: "Servicing of the replacement supermarket should be accessed from Baytree Road rather than from Acre Lane". Baytree Road is a solely residential street, which is restricted in width due to resident parking on both sides. The street is heavily parked and incorporates a bend to its northern end. It further includes speed bumps and a 'no right turn' at its southern end, which limit its use as a cut-through between Acre Lane and Brixton Hill. It is further home to principally family housing. The use of Baytree Road by servicing HGV vehicles is simply not compatible with safety and realistic traffic flow. It presents a clear highway safety issue, together with a residential amenity issue due to the anti-social hours of deliveries causing noise and vibrations. Servicing access should only be taken from the junction with Acre Lane and servicing vehicles should not travel along Baytree Road, which should be set out in any allocation wording. A detailed Servicing Management Plan should be included within any application, which should include restrictions on delivery numbers/times/vehicle types and the robust measures to prevent use of Baytree Road by delivery vehicles. This could include vehicle width restriction bollards. Any scheme should also include restrictions for future residents and users of the development from parking on Baytree Road. We would also expect a Transport Statement and Travel Plan.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane. Any future planning application will be accompanied by a Transport Assessment, along with draft Delivery and Servicing Management, Construction and Environmental Management and Travel Plans. Full Plans will be secured and assessed via appropriate planning conditions.
Individual	R0649	vision map	We support the Council's identification of the northern side of Baytree Road as a 'sensitive residential neighbour'; however, the southern side should also be identified given the proximity to the site.	Any proposal will need to meet all the relevant amenity policy tests not just in terms of the properties identified on the vision map but in terms of all affected properties.
Individual	R0649	vision map	The Map identifies that the servicing route is to be retained. The arrow exiting the site should be extended northward to Acre Lane, to demonstrate the requirement is for vehicles to take entry and exit from Acre Lane, and not the domestic Baytree Road.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The map will be amended to make this clearer.
Individual	R0649	vision map	Trees of amenity value are identified; however, the Map should expressly note that these are expected to be 'retained'. We would also suggest that existing trees along the Baytree boundary be retained.	The retention of trees will be dependent on their health, condition and other considerations. For that reason, the Council does not wish to explicitly state that particular trees must be retained. An applicant would be required to undertake detailed arboriculture assessments when development any proposal and work up a scheme which retains trees in accordance with British Standard best practice. Policy Q10 in the local plan will apply when proposals are assessed.

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R0649	context map	The Context Map should include sensitive residential receptors and trees of amenity value for retention.	The retention of trees will be dependent on their health, condition and other considerations. For that reason, the Council does not wish to explicitly state that particular trees must be retained. An applicant would be required to undertake detailed arboriculture assessments when development any proposal and work up a scheme which retains trees in accordance with British Standard best practice. Policy Q10 in the local plan will apply when proposals are assessed.
Individual	R0649	other	The approach to focussing any taller buildings to the Acre Lane frontage is welcomed; however, the 32m wing (centre of the site) and 16m wing (south of the site) as shown in Figure 11 are not acceptable. The building should only step down away from the Acre Lane frontage, not up.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R0649	other	32m is considered to be out of context with the area.	See comments above.
Individual	R0649	other	Whilst the document states that "best practice separation distances" have been considered, no clarification on the distances is provided. A minimum of 21m should be provided to any facing windows. In general terms, any massing at the south of the site should be no taller than the properties on Baytree Road, which are noted as being 8m and 9m in height. A development in very close proximity at 16m (double many existing properties) would clearly be overbearing, resulting in issues relating to outlook, increased sense of enclosure and loss of privacy. This part of the proposed development needs to be reconsidered. Windows/balconies should be minimised on the southern elevation to avoid mutual overlooking and loss of privacy. Any balconies should be directed over the podium garden. Overlooking into the private gardens of properties along Baytree Road also needs to be avoided.	There is no policy justification for a 21m separation distance. The detailed design of applicants will have to address all relevant policies including those on amenity.
Individual	R0649	other	We would expect to see all council targets are met, and a Sustainability Statement submitted with any future application	Any proposal development on the site will need to meet the requirements of relevant development plan policies. This includes Policy EN4 of the Lambeth Local Plan (Sustainable Construction and Design) which requires proposals to include a statement on sustainable design standards.
Brixton Society	R0689	Other	Land Uses/ Employment Space: It is important that the existing supermarket use is retained in any development, but we accept that there is potential for residential development to be added, provided that it is in scale with its surroundings.	Comments noted.

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
Brixton Society	R0689	Other	Building Heights, Views, Townscape: This is the element of greatest concern, because the Council is too willing to encourage high-rise high-density development. The proposed development is substantially higher than existing buildings, so would have a damaging effect on the character and visual amenity of this section of Acre Lane.	The heights identified do not meet the local plan policy definition of a tall building which is 45m when located north of the South Circular Road.
Brixton Society	R0689	Other	The adjacent Conservation Areas have been disregarded.	The evidence includes townscape and visual impact assessments from the nearby conservation areas. The current Tesco and car park do not contribute to the significance (including setting) of these designated assets. The reintroduction of enclosure, animation and high-quality architecture along Acre Lane will have beneficial effects on heritage settings.
Brixton Society	R0689	Other	The prevailing height of existing buildings along the eastern arm of Acre Lane is only 4 storeys. Adjacent housing in Porden and Baytree Roads is only 2 storeys, with some attic extensions. The proposed building heights of up to 24m behind Porden Road, rising to 32m in the centre of the site, and 16m (5+ storeys) behind Baytree Road are grossly excessive. A prospective developer will regard these heights as only a starting point for negotiating upwards.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Brixton Society	R0689	Other	The proposed 15m block at the corner of Acre Lane and Porden Road would be similar in height to the extended Ivor House but also dramatically reduce daylight to the rear of Nos. 2 & 4 Porden Road. Its forward position would block views along Acre Lane to both Ivor House and the restored Town Hall.	The curved alignment of Acre Lane prevents views of the Town Hall from west of the site allocation site. Therefore, an increased height on the site will have no impact on views of the Town Hall. It is correct that Tesco development on the car park will screen Ivor House from view when the viewer is outside the site on Acre Lane. The townscape benefits of redevelopment of the car park far outweigh the very limited screening effect to Ivor House. Indeed, when Ivor House was built there were buildings on the Tesco car park site. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.
Brixton Society	R0689	Other	The remainder of the proposed Acre Lane frontage is proposed as poorly-related blocks of excessive height, rising to 27m (at least 9 storeys where residential).	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations.

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
Brixton Society	R0689	Other	The indicative layouts show no concept of Urban Design. Instead, it would suit the context better to have a continuous frontage of no more than 5 storeys, all set back about 2m behind the back-of-pavement line.	The building line has been dictated by the presence of street trees and their canopies and a desire to ensure those trees are respected by any development.
Brixton Society	R0689	Other	Transport/ Public Realm: No additional access routes should be introduced from Baytree Road or Porden Road.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer. The customer car park would not be accessed from Baytree Rd or Porden Rd.
Brixton Society	R0689	Other	The present shoppers' parking is not normally used to full capacity, so the number of spaces could be reduced in any future development.	A significant reduction in parking numbers must be secured on site, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement.
Brixton Society	R0689	Other	It is common for suburban supermarket sites to include petrol filling stations, so for a retail site of this size, it would certainly be worth including electric charging points.	Any proposals would need to meet or exceed the London Plan's minimum requirements, to provide for rapid electric vehicle charging on site.
Brixton Society	R0689	Other	Energy & Environmental issues: Excessive building heights within the site will result in poorer environmental conditions for residents of the surrounding buildings. The proposed tall buildings will reduce daylight to neighbours and our general comments on microclimate and wind effects apply to this site in particular.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0842	Other	I am owner (for 24 years) of [Redacted]. Which backs on to Tesco on Acre Lane. I seriously object to this proposal in its present form for the following reasons. It goes against Lambeth policy which states "The scheme should be designed to cause no unacceptable impact on existing neighbours adjacent to the site, including overlooking,, loss of daylight, overshadowing and noise pollution. Particular regard should be paid to the relationship with sensitive neighbours on Baytree Rd, Porden Rd and Arlington Lodge") My property would be adversely affected in every way mentioned	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			above, including loss of sunlight to the garden which is such a pleasure.	policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Any proposed development would also be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against the policies listed above and other relevant guidance.
Individual	R0842	Other	The proposal includes a commercial property at the end of Porden Rd. Why? When the council has just allowed the demolition of a commercial site next door and west of Tesco's on Acre Lane and where other commercial property remains empty on Acre Lane (opposite Tesco's and the ground floor of Lambeth building on the east end of Porden Rd.	The site is within a town centre and Creative Enterprise Zone. The provision of a commercial unit in this location accords with objectives of Lambeth Local Plan policies ED7 and PN3
Individual	R0842	Other	The residents of Porden Rd have suffered immense disruption noise and pollution for over five years during the building of the new town hall, and flats, and the thought of it starting again is frankly intolerable.	The impact of any demolition and construction will be considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming forward, as required by Local Plan Policy T7.
Individual	R0842	Other	5) Parking. Lack of. During Porden Rd's residents association's negotiations with Lambeth council during the building of the new town hall they took away several parking spaces in the street and gave us a promise that no resident's parking permits would be allowed to new residents of the flats at the top of Porden Rd. This promise has not been kept and the pressure to find a space and the exorbitant cost of parking is an issue. At the moment Tesco provides not only parking for its shoppers but the public can buy day/week or monthly day/evening parking for longer than the free 90 minutes. This is particularly useful for residents if they need to hire any trade person to do repairs in their home. All trades people have to drive. Would this amenity be withdrawn if Tesco's reduced their parking area. It is a real asset not only for residents but for people coming from out of town to the Brixton academy and the Electric. Would the new residents of the proposed flats be eligible for residents parking permits and if so are Lambeth able to provide extra parking? I doubt it.	In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. A reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. However, some car parking will be reprovided, with a focus on disabled parking and electric vehicle charging
Individual	R0842	Other	At the moment Tesco's have no public lavatories in store, and there are none in central Brixton. Before covid this was an acute problem and will become soon again during the nightlife of central Brixton. People would	Comment noted.

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
			come into Porden Rd to relieve themselves against our walls and in our front gardens. Some even brought their own toilet paper! We have pictures. Perhaps Tescos could address this if Lambeth won't.	
Individual	R0842	Other	If any new flats between 3 and 9 stories are to be built could they not run along the frontage of Acre Lane thus not dwarfing the mainly two story houses in the surrounding streets. As they did before they were demolished to make way for Tesco's. (See Sharon Osbourne's program "Who do you think you are). Please reconsider this proposal.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards')
Individual	R0844	Other	I am owner (for 24 years) of [Redacted]. Which backs on to Tesco on Acre Lane. I seriously object to this proposal in its present form for the following reasons. 1) It goes against Lambeth policy which states "The scheme should be designed to cause no unacceptable impact on existing neighbours adjacent to the site, including overlooking,, loss of daylight, overshadowing and noise pollution. Particular regard should be paid to the relationship with sensitive neighbours on Baytree Rd, Porden Rd and Arlington Lodge" 2) My property would be adversely affected in every way mentioned above, including loss of sunlight to the garden which is such a pleasure.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Any proposed development would also be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against the policies listed above and other relevant guidance.
Individual	R0844	Other	The proposal includes a commercial property at the end of Porden Rd. Why? When the council has just allowed the demolition of a commercial site next door and west of Tesco's on Acre Lane and where other commercial property remains empty on Acre Lane (opposite Tesco's and the ground floor of Lambeth building on the east end of Porden Rd.	The site is within a town centre and Creative Enterprise Zone. The provision of a commercial unit in this location accords with objectives of Lambeth Local Plan policies ED7 and PN3.
Individual	R0844	Other	The residents of Porden Rd have suffered immense disruption noise and pollution for over five years during the building of the new town hall, and flats, and the thought of it starting again is frankly intolerable.	The impact of any demolition and construction will be considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming forward, as required by Local Plan Policy T7.
Individual	R0844	Other	Parking. Lack of. During Porden Rd's residents association's negotiations with Lambeth council during the building of the new town hall they took away several parking spaces in the street and gave us a promise that no resident's parking permits would be allowed to new residents of the flats at the top of Porden Rd. This promise has not been kept and the pressure to find a space and the exorbitant cost of parking is an issue. At the moment Tesco provides not only parking for its shoppers but the public can buy day/week or monthly day/evening parking for longer than the free 90 minutes. This is particularly useful for residents if they need to hire any trade person to do repairs in their home. All trades people have to drive. Would this amenity be withdrawn if Tesco's reduced their parking area. It is a real asset not only for residents but for people coming from out of town to the Brixton academy and the Electric. Would the new residents of the proposed flats be eligible for residents parking permits and if so are Lambeth able to provide extra parking? I doubt it.	In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. A reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. However, some car parking will be reprovided, with a focus on disabled parking and electric vehicle charging
Individual	R0844	Other	At the moment Tesco's have no public lavatories in store, and there are none in central Brixton. Before covid this was an acute problem and will become soon again during the nightlife of central Brixton. People would come into Porden Rd to relieve themselves against our walls and in our front gardens. Some even brought their own toilet paper! We have pictures. Perhaps Tesco's could address this if Lambeth won't.	Comment noted.
Individual	R0844	Other	If any new flats between 3 and 9 stories are to be built could they not run along the frontage of Acre Lane thus not dwarfing the mainly two story houses in the surrounding streets. As they did before they were demolished to make way for Tesco's. (See Sharon Osbourne's program "Who do you think you are"). Please reconsider this proposal.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
GLA	R0852	Other	This site has a PTAL of 6a. The site allocation states that London Plan parking standards would apply, however it then goes on to state that a replacement store is expected to 'need an appropriate level of parking	A reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			to operate effectively'. Table 10.5 in the LP2021 requires car-free parking standards for retail within all areas of PTAL 5-6. Car parking provision in this location should be kept to a minimum focusing on the need for disabled bays and space should be used for activities that create vibrancy and contribute to the formation of liveable neighbourhoods.	reduction and air quality improvement. However, some car parking will be reprovided, with a focus on disabled parking and electric vehicle charging
Montagu Evans on behalf of HSBC	R0869	Other	<p>Context For Representations</p> <p>We are instructed by our client, HSBC Bank Pension Trust (UK) Ltd, to formally submit representations to the London Borough of Lambeth ('LBL') consultation on the Draft Site Allocations Development Plan Document (SADPD) (Regulation 18) in relation to the Tesco Superstore at 13 Acre Lane, Brixton, London, SW2 5RS ('the Site'). An indicative Site Location Plan is provided at Appendix 1.0.</p> <p>Our client has a freehold interest in the Site in accordance with a 999 year lease from 2008. Tesco currently occupies the Site with a lease that expires in 2028. The Site is subject to a draft site allocation within the draft SADPD, identified as 'Proposed Site 20', and these representations relate specifically to the content of this draft site allocation. An extract of the draft site allocation is provided at Appendix 2.0.</p>	Comments noted.
Montagu Evans on behalf of HSBC	R0869	Other	<p>The Site and Surroundings</p> <p>The existing Site comprises an area of approximately 1.24 hectares (3.06 acres) and includes a single storey Tesco supermarket building providing approximately 2,500 sqm of net internal sales area and associated car parking (for approximately 230 car parking spaces). Currently, the Site is underutilised and occupied by a late 20th century Tesco retail building, located to the western portion of the Site, fronting Acre Lane. The remainder of the Site is used for parking, servicing and vehicle circulation routes. The existing development is considered to be harmful to the urban design of the area. It comprises poor architecture which has no relationship to its context in terms of detailing and materials. It also presents no active frontage to the street scene along Acre Lane.</p> <p>There are a number of vehicular accesses and exits to the Site, which include:</p> <ul style="list-style-type: none"> • Access to the customer car park via Porden Road and Acre Lane with the car parking exit via Baytree Road; and • Delivering and servicing access to the western boundary of the Site via Acre Lane and exit via Baytree Road. <p>The Site is not located within a Conservation Area and does not comprise any listed buildings, though both kinds of assets are in its setting, including:</p>	Comments noted.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<ul style="list-style-type: none"> • Trinity Gardens Conservation Area; • Brixton Conservation Area; • Rush Common and Brixton Hill Conservation Area; • Lambeth Town Hall, Brixton Hill / Acre Lane (Grade II); • Trinity Homes Almshouses, 1-26 Acre Lane (Grade II); • 46 Acre Lane (Grade II); • Cedars House, 48-50 Acre Lane, (Grade II); • 52 Acre Lane (Grade II); • 55-57 Acre Lane (Grade II); and • Ivor House, Acre Lane (local list). 	
Montagu Evans on behalf of HSBC	R0869	Other	<p>The Site contains a number of existing trees including two trees which are subject to a Tree Preservation Order, identified as:</p> <ul style="list-style-type: none"> • Tree 1 – Sycamore Acer pseudoplatanus on boundary with 22 Baytree Road SW2 5RP; and • Tree 3 – Sycamore Acer pseudoplatanus within Tesco car park c15m from the boundary with Acre Lane. <p>There are also a number of trees fronting Acre Lane. However, they fall outside the Site boundary.</p> <p>The Site has a Public Transport Accessibility Level ('PTAL') of 6a (Excellent) with Brixton Underground and overground stations within a 5-minute walk of the Site. As the Site is well served by sustainable transport modes, there is greater capacity for the Site to provide more intensive development.</p> <p>The Site is located within Flood Risk Zone 1 (low probability of flooding) with no known surface water management issues.</p> <p>As such, any development of the Site would not preclude more sensitive uses at ground floor level and would be less likely to need to design around flooding issues.</p> <p>In terms of surrounding context, the Site is bounded to the:</p> <ul style="list-style-type: none"> • North by Acre Lane itself, with buildings of predominately two-three storeys comprising residential and retail uses beyond on the opposite side of Acre Lane, within the Trinity Gardens Conservation Area; • East by terraced residential dwellings fronting Porden Road, with Ivor house and Brixton Town Hall located further east along Acre Lane, within the Brixton Conservation Area; • West by Baytree Road, with a residential dwelling (No. 30 Baytree Road) located at the western boundary. Further west on the opposite side of Baytree Road lies 41-45 Acre Lane which is being redeveloped for a residential development; • The southern boundary of the Site comprises two-storey terraced and semi-detached dwellings. The southeast corner of the site tapers to a point between Arlington Lodge and Somerset Place, a five storey blocks 	Comments noted. TPO info updated.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			of flat. Aerial views of the Site are provided at Appendix 3.0.	
Montagu Evans on behalf of HSBC	R0869	Other	<p>Relevant Planning History</p> <p>There is no relevant online planning history available for the Site on the LBL website. However, it is relevant to note the redevelopment of a number of sites to the east / southeast (LBL Application Refs. 15/02276/FUL, 15/02263/LB and 15/02264/FUL), including:</p> <ul style="list-style-type: none"> • Demolition of Hambrook House and erection of a part 14, part 10 and part 4-6 storey mixed use building accommodating 94 residential units plus a ground floor commercial unit; • Demolition of No's 1-7 Town Hall Parade and erection of a 6 storey civic office building comprising 11,084 sqm of floorspace (Use Class B1); • Refurbishment and alterations to Grade II Listed Lambeth Town Hall to provide a committee room, new office and community uses; • Change of use of Ivor House to provide 26 residential units at upper floor levels, involving the erection of a mansard roof extension; and • Demolition of Olive Morris House and the erection of a part 6, part 7 storey building comprising 74 residential units (Use Class C3) along with commercial floorspace (flexible A1/B1/D1/D2 use classes) at ground and basement levels. <p>A map showing the location details of the proposals for each of the Sites is included at Appendix 4.0.</p> <p>In addition to this, 41-45 Acre Lane to the west of the Site is currently being redeveloped for a part two, part four and part five storey residential development including office space (LBL Application Ref. 17/03846/FUL).</p> <p>The recent redevelopments within the Site proximity demonstrate that the surrounding area is one which is undergoing significant change in terms of the scale, form and nature of development.</p>	Comments noted.
Montagu Evans on behalf of HSBC	R0869	Other	<p>Adopted Lambeth Local Plan Policy Designations</p> <p>Within the adopted Lambeth Local Plan, the Site is subject to the following designations:</p> <ul style="list-style-type: none"> • Brixton Town Centre (outside the primary shopping area); and • Brixton Creative Enterprise Zone. <p>Lambeth Local Plan 2020-2035 (2021) Policy PN: Brixton Part S supports the redevelopment of the Site, stating 'the Tesco site provides a potential opportunity for mixed-used redevelopment. Public realm improvements along Acre Lane will be supported'.</p> <p>As such, the principle of the redevelopment of the Site for a mixed-use</p>	Comments noted.

Respondent	ID	Draft SADPD Section	Comment	Officer response
			development sought by the draft SADPD allocation is consistent with the objectives of the adopted Lambeth Local Plan.	
Montagu Evans on behalf of HSBC	R0869	Other	<p>Priorities & Objectives</p> <p>Our client is broadly supportive of the aspirations of the draft allocation 'Proposed Site 20' within the SADPD and are confident that there are no impediments to bringing the Site forward for redevelopment. However, their primary objective is to ensure that the Site remains fit-for-purpose in the short, medium and long-term and can continue to contribute positively to Brixton's distinctives. In doing so, there will be an opportunity for the Site to deliver significant long-term, local community benefits to Lambeth.</p> <p>Given the Site's highly accessible, sustainable, urban location, there is significant potential to strengthen the Town Centre environment with the provision of a new, high quality designed development that would provide new market and affordable homes, a replacement supermarket, ground floor active frontage and the enhancement of pedestrian connectivity through and around the Site through the creation of new routes.</p> <p>Our client supports the reprovision of a supermarket on the Site as part of the draft allocation and are committed to working with Tesco to ensure the delivery of this. They are currently engaged in detailed discussions with Tesco to understand their future operational site requirements and are exploring options to allow for continuity of operation for Tesco on the site as part of any future development proposals.</p> <p>Our client will continue to work proactively with Tesco in order to ensure that any future development proposals on the site are carefully considered, fit-for-purpose, make a significant enhancement to developing the economic resilience of Brixton Town Centre and deliver a social and environmentally sustainable development.</p>	Comments noted.
Montagu Evans on behalf of HSBC	R0869	Other	<p>Future Character of Acre Lane</p> <p>Acre Lane is the key route from the west into the Town Centre, connecting Brixton and Clapham Common. In parts, Acre Lane retains a pleasant character. Handsome historic buildings, some of which are listed, stand between the mundane retail sheds of the 20th century. Restaurants, shops and attractive flats have begun to emerge. The redevelopment of the Site has the potential to fundamentally improve the character and quality of Acre Lane, by delivering a building that enlivens the streetscape and celebrates the town hall. The proposed building will be highly visible in the views down Acre Lane from the west, requiring a resolute architectural solution on the prominent corner with Baytree Road. Overall, the Site is well contained. It is obscured by</p>	Comments noted.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			interposing existing development, particularly the large buildings on Brixton Road and Brixton Hill and the town hall. Recent development on Brixton Hill adjacent to the Civic Centre and the large 1930s mansion blocks, set the precedent for taller buildings that work successfully within the townscape of Brixton and make a positive contribution to the wider area.	
Montagu Evans on behalf of HSBC	R0869	Other	<p>Proposed SADPD Amendments</p> <p>Consequently, our client considers that there are a number of amendments required to the draft site allocation, sought as part of these representations, which would secure the necessary flexibility for the detailed design of any future development proposals to optimise the development capacity of the Site and help deliver key placemaking objectives. The following table sets out the relevant policy extracts of the draft SADPD allocation 'Proposed Site 20' and we take this opportunity to comment on the detailed wording of emerging policy. We ask that the Council takes these detailed recommendations into account in the drafting of the next iteration of the SADPD.</p> <p>The original text is shown below with suggested wording amendments made by the strike through lines with additions in red text and comments given in square brackets, where relevant.</p>	Comments noted.
Montagu Evans on behalf of HSBC	R0869	Context	<p>There are three two existing trees on site protected under Tree Preservation Order no. 180. These are:</p> <p>Tree 1 – Sycamore Acer pseudoplatanus on boundary with 22 Baytree Road SW2 5RP</p> <p>Tree 2 – Ash Fraxinus excelsior on boundary with 4 Porden Road SW2 5RT.</p> <p>However this tree is no longer present.</p> <p>Tree 3 – Sycamore Acer pseudoplatanus within Tesco car park c15m from the boundary with Acre Lane.</p> <p>Tree Preservation Order no. 180 also states there is a third tree, Tree 2 –</p> <p>Ash Fraxinus excelsior on boundary with 4 Porden Road SW2 5RT.</p> <p>However this tree is no longer present.</p> <p>There are existing mature street trees along the Acre Lane boundary of the site.</p>	Comments noted. The text has been amended to reflect the fact that two of the three trees protected under TPO number 180 are no longer present on site.
Montagu Evans on behalf of HSBC	R0869	Site Allocation Policy	<p>The provision of active frontages with ground floor town centre uses will be encouraged along Acre Lane (including Use Class E and Sui Generis uses).</p> <p>[Active frontages are vital to successful placemaking and we suggest</p>	Active frontage/ground floor commercial use is supported in this location by Local Plan Policy ED7C(iii), subject to other development plan policies. However, it is not considered to be principle land use aspiration for the site and therefore a reference within the Site Allocations DPD is not considered necessary.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			that the ability to provide appropriate ground floor retail uses should be a principle land use within the draft allocation].	
Montagu Evans on behalf of HSBC	R0869	Site Allocation Policy	The affordable housing threshold is 35 per cent subject to viability	The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan.
Montagu Evans on behalf of HSBC	R0869	Site Allocation Policy	Local Plan and London Plan parking standards will be applied to development proposals. All other Local Plan transport policies, plus Local Plan Policy Q1 on inclusive environments and Policy Q6 on urban design in the public realm should be addressed. A replacement supermarket of equivalent net sales area to the existing store is expected to need will require an appropriate level of parking to operate effectively. Car parking provision for a replacement supermarket should not exceed 150 car parking spaces. Car parking provision should This would secure a meaningful reduction of approximately 80 parking spaces from the existing quantum and contribute toward in order to achieving key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. Non-car access and pedestrian accessibility to the store should be positively promoted through scheme design. Visibility for pedestrians and cyclists should be optimised and pedestrian access into and through the site should be improved. This should include a widened footway along Acre Lane with enhanced urban greening. The location of the servicing access of to the replacement supermarket should be accessed from Baytree Road rather than from Acre Lane will be subject to the detailed design of any future development proposals and	A reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. However, some car parking will be reprovided, with a focus on disabled parking and electric vehicle charging. The existing retail servicing route should be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			an assessment of the potential impacts on the surrounding highways network. Future development proposals should seek to reduce vehicular cross-overs at Acre Lane should be minimised to maximise pedestrian flow to and from the town centre. New streets should be legible, safe, and tree-lined, with adequate defensible space to ground floor residential uses.	
Montagu Evans on behalf of HSBC	R0869	Site Allocation Policy	Residential accommodation should meet seek to achieve all relevant internal and external amenity standards and requirements as set out in London Plan and Local Plan policy and guidance.	All development plan policies will apply to any planning application that comes forward on the site. There will be no flexibility on the application of residential amenity standards set out in the Development Plan.
Montagu Evans on behalf of HSBC	R0869	Site Allocation Policy	Development should address existing open space deficiency and access to nature deficiency by seeking to meeting the requirements of Local Plan Policy EN1(d).	All development plan policies will apply to any planning application that comes forward on the site. There will be no flexibility on the application of Local Plan Policy EN1(d).
Montagu Evans on behalf of HSBC	R0869	Other	We welcome the opportunity to comment on the Lambeth Draft Site Allocations Development Plan Document (SADPD) (Regulation 18) as a key stakeholder within the area. The Site's highly accessible, sustainable and urban location offers the potential to deliver a significant quantum of new private and affordable homes, a replacement supermarket that is fit-for-purpose, other appropriate town centre uses which would generate active frontages, and enhanced pedestrian connectivity through and around the Site. The amendments to the allocation within this Draft SADPD proposed are considered critical to the successful development of the Site and the continued economic growth and long-term sustainability of Brixton Town Centre. We would be happy to discuss these representations in more detail with the Council at an appropriate time and will be in touch to arrange a meeting in due course.	Comments noted.
Environment Agency	R0886	Other	Current flood zone designation: 1 Rivers on / adjacent to site / flood defences: No Permitted waste site within 250 metres: No Groundwater Source Protection Zone: SPZ2 Comments to add into site allocation text: Protect groundwater from contamination sources	Comments noted and accepted. Text changed accordingly.
Individual	R1257	Other	I live on Tulse Hill estate. I am totally disturbed by the proposals for specifically Sites 18 and 19 along with Sites 7, 17, 20 and 21 and, to be	Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the

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			<p>honest, the whole plan!!! I feel that it's as if Lambeth Council is living in a dream and that as long as words like 'affordable housing' and 'flexible workspace' are used, you can carry on with simply carrying on.</p> <p>It's as if you have not noticed that we are living in a climate emergency!! All building needs to stop. There are alternative solutions!! Housing can be created by refurbishing buildings that already stand. We don't need more workspace - flexible or otherwise.</p> <p>These thoughts go along with my personal view that there has not been enough public consultation - we needed to see real plans. I am very disturbed by your ignorance - you ignore the state of the planet, you ignore the people, you ignore your responsibilities and - I just get the impression that as long as you can keep going with your plans, nothing else will matter. I object. Strongly!! I feel that</p> <ul style="list-style-type: none"> • there has been no adequate public consultation on these plans, • the buildings contravene Lambeth's own planning rules, • these developments overall would harm local communities and life itself. It's time to be creating a whole new way of living and some places are doing exactly that. Have you heard of Doughnut Economics? Have you even considered a complete change of plan that would be more suitable to a planet that needs help and a system that needs change? You are damaging the environment, destroying mature trees, breaking up communities and more. You seem to be blind, ignorant and/or stupid. I apologise if that sounds rude but - I'm freaking out here as our lives are in your hands!!! <p>Lambeth has been doing damaging processes similar to these for a long time. When will you start to care and act like reasonable, responsible people? How can you carry on making a total mockery of your own declaration of a 'climate emergency.'</p> <p>You claim to be a 'co-operative council' but it seems that there is no thought or vision for the community or for Lambeth as a whole. Please, hold some real consultations and think again. Please, take care of the people who voted you into position. Consider people and planet over profit. Stop working with only the property developers and start working for and with THE PEOPLE!!!</p>	<p>Council and is also central to the planning process, both in planning policy and decision-making.</p> <p>There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation. This includes transport policies seeking car-free development and encouraging active travel (Local Plan Policies T1-3 and T6); policies encouraging Urban Greening and the protection of open spaces (London Plan Policy G5 and Local Plan Policy EN1) and trees (Local Plan Policy Q10); and policies setting out requirements for sustainable design and construction (Local Plan Policy EN4) and improving air quality (London Plan SI1). A full list of development plan policies addressing climate change mitigation and adaptation can be found in Lambeth Local Plan 2021 Evidence Base document 'Topic Paper 7 – Climate Change'.</p> <p>These policies and guidance are in addition to the existing and emerging new requirements through the Building Regulations regime, such as the emerging Future Homes Standard. All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.</p>
Individual	R1257	Other		<p>Planning applications proposing development on this site will be subject to circular economy principles, which favour retaining and retrofitting over substantial demolition. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (e.g. development of 150 residential units or more or over 30 metres in height) an applicant would need to provide a Circular Economy Statement. This</p>

Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. Referable applications are also required to be accompanied by a comprehensive Whole Life Carbon assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, both these assessments are strongly encouraged.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction. There is considerable demand for workspace in Lambeth, as set out in the Lambeth Local Plan 2021 evidence document 'Topic Paper 3 – Workspace'. Consultation on the Draft Site Allocation DPD was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version. The Draft Site Allocations DPD aligns with Lambeth Local Plan 2021. The approach to the SA DPD is also consistent with that set out in section 11 of the NPPF 2021 on making effective use of land, and paragraph 23 on allocating sufficient sites to deliver strategic priorities of the area.</p>
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites,</p>	Noted.

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			<p>subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but</p>

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			<p>standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.</p>	<p>also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> • Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking</p>	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			<p>producer of anthropogenic (man-made) CO2e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO2e output. - 4-5% of the worldwide total of CO2e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution • Steel Steel also has a significant impact on the environment: <ul style="list-style-type: none"> - It is CO2e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement: • Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit "off-gas" toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. • Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world's riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building 	

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			completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber.	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> • Overheating, caused by the proliferate use of glass and a high concentration of inhabitants • Increasing carbon energy required to offset this through mechanical ventilation • Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise ‘skyscraper’ buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p> <p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in</p>

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				particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council's commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <p>1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p> <p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p>	Noted. Please refer to officer responses to previous points made as part of this representation.

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			<p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	
Individual	R1347	Sustainability Appraisal	Car free development required. Parking at trip start or end, eg supermarket encourages car use & disadvantages the majority of residents who live in Car Free households. Heavy goods can be delivered to customers.	In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. A reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. However, some car parking will be reprovided, with a focus on disabled parking and electric vehicle charging
Individual	R1353	Vision	Agree that the site is currently of poor quality and the car park is wasted. Additional housing is much needed around Brixton especially given the close proximity to the tube station.	Support noted.
Individual	R1356	Site Allocation Policy	Should clearly define provision for cyclists using the supermarket.	London Plan Policy T5 and Local Plan Policies T3 and Q13, relating to cycle parking quantum and design, will apply.
Individual	R1356	Site Allocation Policy	Would other retail uses be considered to compliment the supermarket, e.g. Pharmacy, that would avoid residential units facing onto Acre lane at ground floor?	The draft site allocation does not preclude this. Ground floor retail units that are proposed as part of a detailed planning application on this site could be supported in principle, subject to other Local Plan policies. Retail in this location would help to meet the objectives of ED7 (Town Centres) and PN3 (Brixton).
Individual	R1356	Evidence	Massing fronting onto Acre Lane, especially that above the Tesco, is over scaled for the context. The narrative states the massing rising to nine storeys, whereas six would seem more appropriate given the scale of the buildings along this section of Acre Lane.	Comments noted.

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Individual	R1356	Evidence	Also the new set back along Acre Lane would seem more appropriate in front of Tesco as it will have the largest footfall, and potential for crowding on the pavement.	The set back has been dictated by the presence of existing trees.
Individual	R1367	Vision	Welcome more affordable housing and greenery on this site.	Support noted.
Individual	R1367	Vision	But do not think that buildings that are up to 32m tall are in keeping with context - they will tower over neighbouring houses in Porden Road and Baytree Road - impacting on overall feel of the area as well as light and views. Not in proportion.	Views from property do not benefit from protection under planning law. However, amenity is. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1367	Vision	Acre Lane and surrounding roads are already very active both at day and night, especially at weekends - so increased activity is not necessarily a positive.	The objective to increase activity along Acre Lane is in line with the objectives of Local Plan Policy ED7 (Town Centres): to support the vitality and viability of major centres; encourage activity to street frontages to increase activity and provide natural surveillance.
Individual	R1367	Vision	In terms of community safety, security of houses that back on to the site will be compromised unless additional measures are put in place.	Policy Q3 of the local plan will have to be complied with by applicants. Secure by Design officers scrutinise planning applications and provide advice.
Individual	R1367	Vision	I very much welcome the provision of new affordable/social housing in Lambeth and can see this is a prime site for such a development.	Support noted.
Individual	R1367	Vision	Concerns are: some of the blocks are not in keeping with the surrounding area - disproportionately tall - and will overshadow homes backing onto the site in Porden Road and Baytree Road.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and

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				D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1367	Vision	The view from these homes will be very different and not necessarily an improvement on current views.	Views from property do not benefit from protection under planning law. However, amenity is. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1367	Vision	Light might be affected.	The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1367	Vision	The current Tesco's is a community supermarket with long-standing staff who know many of the customers - I hope that they will have the opportunity to work in the new supermarket should they wish to.	Comments noted.
Individual	R1367	Vision	Impact on local infrastructure: on-street parking is already very limited - even for those with residents' permits - what provision will be made for residents' cars?	In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.
Individual	R1367	Vision	Tesco car-park also serves as a short-stay car-park for visitors, trades-people and shoppers to Brixton. Without it, there will be virtually no parking for non-residents.	A reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. However, some car parking will be reprovided, with a focus on disabled parking and electric vehicle charging.
Individual	R1367	Vision	It would be good to know what the commercial premises on the corner of Porden Road and Acre Lane could be used for - Lambeth is very enthusiastic about promoting the night-time economy- so we naturally consider the possibility of another 'bar' opening so close to our homes.	The Site Allocation Policy does not require a commercial unit in this location. A range of commercial uses could be acceptable in this location, subject to other development plan policies. If a detailed planning application is submitted which includes a commercial use, this would be

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
				assessed against Local Plan Policy ED7 (Town Centres) and other relevant policies such as ED8 (Evening Economy and food and drink uses) and ED1 (Offices).
Individual	R1368	Vision	In principle this sounds good but what is needed is real affordable housing (not the new definition) and please no tower block developments !!!	The location has not been identified as suitable for tall building development. Affordable housing will be sought in line with the London Plan Threshold Approach (Policy H5). Lambeth Local Plan Policy H2 and London Policy H6 require that a range of genuinely affordable housing tenures is delivered including low cost rented accommodation. The Site Allocation Policy sets out that the site is not appropriate for a tall building development.
Individual	R1396	Vision	As a resident of Baytree Road, I am supportive of improving the site and providing more housing	Support noted.
Individual	R1396	Vision	but concerned about the impact on homes in Baytree Road. We must make sure that neither service vehicles nor customer cars travel down Baytree Road.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer. The customer car park would not be accessed from Baytree Rd.
Individual	R1396	Vision	I fully support the official response by residents of Baytree and Porden Roads https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response
Individual	R1402	Site Allocation Policy	The percentage of so called "affordable housing" is too low, and in case such housing is usually not affordable for local residents. I'd like to see the inclusion of social housing coupled with a higher proportion of affordable housing.	Affordable housing will be provided in accordance with Local Plan Policy H2. This requires at least 35% affordable housing to be delivered and for 70% of the affordable housing to be low cost rented homes (Social Rent/London Affordable Rent). The customer car park would not be accessed from Baytree Rd or Porden Rd.
Individual	R1407	Vision	Affordable housing isn't good enough - and barely counts as affordable for most. If development is going ahead in Brixton, it should be highly insulated, high specification council housing to avoid the displacement of people from the area through gentrification.	Any planning application that is brought forward on the site will be subject to development plan policies including Lambeth Local Plan Policy H2 and London Policy H6. These require that a range of genuinely affordable housing tenures is delivered including low cost rented accommodation. Any planning application would also be subject to Building Regulations and development plan policies including EN4 'Sustainable Design and Construction', London Plan Policy SI 2 'Minimising Greenhouse Gas Emissions' which require energy efficiency measures, and Local Plan Policy H2C 'delivering affordable housing' which specifies that affordable housing should be equivalent in siting, appearance and layout to the rest of the development
Individual	R1408	Site Allocation Policy	still no provision of electric vehicle charging station in carpark of supermarket.	Any proposals would need to meet or exceed the London Plan's minimum requirements, to provide for rapid electric vehicle charging on site.
Individual	R1408	Site Allocation Policy	No provision of social housing not good enough, affordable housing at 35% is totally inadequate.	The requirement for 35% affordable housing aligns with the London Plan threshold approach (London Plan H5). Lambeth Local Plan Policy H2 requires that 70% of affordable housing delivered is low cost rent (social rent or London Affordable Rent).

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R1415	Vision	The proposal to have vehicular access on Baytree Road is unacceptable. The impact of noise pollution and additional pollution from vehicles has not been taken into consideration...	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer. The customer car park would not be accessed from Baytree Rd.
Individual	R1415	Vision	It is imperative that the current restrictions on no entry to Baytree Road from Brixton Hill, and no right turn from Baytree Road onto Brixton Hill, introduced in 2012 after considerable consultation, continues and is better enforced. For residential properties of the new development there needs to be an absolute guarantee that they are not eligible for parking permits, even if they are electric or hybrid cars.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane. In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.
Individual	R1415	Vision	There also appears to be no consideration on the impact to the new residents of the plot being developed at 41-45 Acre Lane..... There also appears to be no account of the impact of yet more extensive demolition and construction in the area following that of the Civic Centre, Porden House, Olive Morris House and 41-45 Acre Lane on the well-being and mental health of local residents.	The new development at 41-45 Acre Lane is marked as a sensitive residential neighbour on the vision map and the site allocation policy has been updated to include a reference to it. The impact of any proposed development on all existing neighbours will be assessed in detail at the time a planning application is submitted. The impact of any demolition and construction will also be assessed at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming forward, as required by Local Plan Policy T7
Individual	R1417	Vision	With the nearby streets being Low traffic areas, there should not be any attempt to increase cars on Acre Lane	In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. A significant reduction in parking numbers must be secured on site, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement.
Individual	R1423	Vision	This site could definitely be improved but what is 'potential' for urban greening? That's very non-specific and something solid should be planned.	Requirements relating to Urban Greening are set out within the proposed Site Allocation Policy. Any detailed planning application that comes forward on the site will be assessed against Local Plan policy EN1 and London Plan policy G5 in relation to Urban Greening.
Individual	R1423	Vision	Also - what is 'affordable' housing? Lambeth has a bad reputation of unaffordable 'affordable' housing.	Affordable housing will be provided in accordance with Lambeth Local Plan Policy H2 and London Plan Policy H6 which seek a range of genuinely affordable tenures including low cost rented accommodation.
Individual	R1423	Vision	Also - what will Tesco pay for? Council money should not be used to rebuild a supermarket!	It is not proposed for any redevelopment of the site to be funded by Lambeth Council.

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R1423	Vision	It would be good to consider having no parking to discourage people driving into the centre to park at Tescos. This would reduce congestion and improve air quality and give more space for sustainable uses that benefit all residents not just those who drive.	A reduction in parking numbers must be secured on site, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement.
Individual	R1433	Site Allocation Policy	Secure covered cycle parking for those visiting/shopping should be mandated in the design to promote active travel in line with borough transport strategy.	London Plan Policy T5 and Local Plan Policies T3 and Q13, relating to cycle parking quantum and design, will apply.
Individual	R1433	Vision	Restoring a frontage to acre lane will improve the area. The current use of most of the plot to car parking is a waste of public realm.	Support noted.
Individual	R1435	Vision	This Tesco may not be the best but is used by many people living in the area and employs many local people. What will happen to them.	A replacement supermarket would be required as part of any redevelopment of the site.
Individual	R1435	Vision	If it was to be all social housing and the current employers were being place elsewhere I would understand. But building new properties outside what most people in the area can afford I therefore disagree with the plans.	Comments noted.
Individual	R1470	Site Allocation Policy	As a homeowner in Lambeth, I am strongly in favour of welcoming more people to our borough. I use this Tesco to shop, and whilst it will be temporarily inconvenient to be unable to use the store, I remain strongly in favour, as the increase in the number of customers using the store will encourage longer opening hours, which will increase how useful the store is to me in the long term.	Support noted.
Individual	R1486	Vision Map	It is completely meaningless. I have no idea what putting residential properties and a supermarket of equivalent net sales space plus appropriate parking will look like. How can I therefore comment on it.	Comment noted.
Individual	R1487	Vision	The scheme seems to make no mention of parking for residents of the new development. And it proposed to reduce the capacity from the existing car park: 'Car parking provision should secure a meaningful reduction from the existing quantum.' Recent developments in the area are already causing problems for residents, many of whom may have no option but to travel by car for health reasons. Residents of Porden Road are often forced to park on Baytree Road due to the influx of cars in the recent Porden Road development. It's all very well to say 'Non-car access and pedestrian accessibility to the store should be positively promoted through scheme design' but unless there is provision for resident parking as well as encouraging shoppers to travel by public transport or bike, it will become impossible for residents to park on the roads they live on. In Neighbour relationships, you say, 'The scheme should be designed to cause no unacceptable impacts on existing neighbours adjacent to the site...'	In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. Disabled parking will be provided in line with London Plan standards.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			- to do this, there must be parking for residents of the new flats in the new car park.	
Individual	R1487	Vision	In addition to the above, I support the joint response from residents of Baytree and Porden roads: https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response.
Individual	R1491	Vision	I am generally supportive of the repurposing of the plot for mixed residential and commercial use.	Support for the general principle of development is noted.
Individual	R1491	Vision	However I am generally dissatisfied with the current proposal which, I feel, goes against some of the very principles it is promoting (for instance: lack of appropriateness for tall building development,	The heights identified do not meet the local plan policy definition of a tall building which is 45m when located north of the South Circular Road.
Individual	R1491	Vision	No significant reduction in amenities for adjacent roads such as Baytree Road and Porden Road).	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1491	Vision	As such I fully support and agree with every point raised in the collective response from these 2 streets (https://bit.ly/3uXtLaU).	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response
Individual	R1491	Site Allocation Policy	Proposed housing density goes far beyond the objective of "restoring" a building line along acre lane, with proposed building height not congruent with the rest of the street and the neighbourhood generally.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1491	Site Allocation Policy	I am particularly concerned by: - The height of the building (16m) on the south side of the development (next to the northern baytree road gardens), which would create significant overlook, loss of privacy and reduced light.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').</p> <p>The indicative approach has also been tested to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. Any proposed development would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against the policies listed above and other relevant guidance.</p>
Individual	R1491	Context Map	I fully support every key statement made in the collective response (https://drive.google.com/file/d/1GxvjsEQ4g0IQXTR1tGKm3qSXgoZ5yb1M/view)	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response
Individual	R1492	Vision	I can see the rationale of Lambeth's policy objectives for this site. It has the potential to provide additional housing and offer an improvement to the urban landscape through higher quality architecture, while still providing a large supermarket site.	Support is noted.
Individual	R1492	Vision	But I have major concerns that the proposed approach - despite the proposals stating that they recognise the importance of safeguarding conditions for adjacent housing, and the principle of differential stacking so as to reduce the risks of overlooking and undue dominance over existing adjacent housing - in fact do exactly the opposite and will both overlook and be unduly dominant. If the proposals in the SADPD are not amended, they will lead to an over-dense and overbearing development compared to existing local housing, and other nearby commercial properties, largely due to excessive height and massing.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1492	Vision	The plan should either include provision for parking, or properties there should not be eligible for parking permits on local streets, including Baytree Road. There is already a shortage of parking and it is increasingly necessary to park far from home to get a space. Adding hundreds more households and cars without adding capacity can only end badly. No plan should be this myopic, no matter how much the	In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			council wishes to incentivise people to use public transport rather than cars (a policy objective I do not ultimately oppose).	
Individual	R1492	Vision Map	The servicing proposals are unrealistic, given how narrow Baytree Road is. The proposals will be impracticable if service access is from Baytree Rod rather than the much larger Acre Lane. A bigger fear is that it will also be dangerous, particularly given the new development under way at the junction of Baytree Road and Acre Lane, building new houses and apartments directly opposite the access point proposed. And I am suspicious that the development might be accompanied by a move to make Baytree Road accessible from Brixton Hill, a dangerous rat run that was closed by the council in collaboration with the local residents association, to the benefit of all.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane. The consented development at 41 - 45 Acre Lane (ref 17/03846/FUL) includes office space at ground floor opposite the existing service yard exit. This relationship would remain unchanged.
Individual	R1492	Context Map	I am entirely supportive of the collective response that other comments have referenced, at https://drive.google.com/file/d/1GxvjsEQ4g0IQXTR1tGKm3qSXgoZ5yb1M/view .	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response. The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.
Individual	R1494	Vision Map	The existing service/delivery access to Tesco from Baytree road is already far too tight. The enormous delivery vans attending daily have to perform complex manoeuvres crossing Acre Lane and blocking Baytree Road entirely causing inconvenience and risk to pedestrians and other road users. This will also have a major impact on the residential properties currently under construction at corner of Baytree and acre lane, (planning application no. 17/03846/FUL) in terms of noise and disturbance. Also I fully support the comments made in the report SADPD Site 20 (Tesco): Responses from Baytree Road and Porden Road residents link: https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Baytree Road and Porden Road is noted. Please see Representation R0324 for a full response. Any future planning application would be accompanied by a Transport Assessment which should include an assessment of the suitability of all access points, using swept path analyses of the largest expected vehicles. The consented development at 41 - 45 Acre Lane (ref 17/03846/FUL) includes office space at ground floor opposite the existing service yard exit. This relationship would remain unchanged.
Individual	R1494	Vision	I fully support the comments made in the report SADPD Site 20 (Tesco): Responses from Baytree Road and Porden Road residents link: https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response
Individual	R1496	Site Allocation Policy	Regarding the following: "Servicing of the replacement supermarket should be accessed from Baytree Road rather than from Acre Lane. Vehicular cross-overs at Acre Lane should be minimised, to maximise pedestrian flow to and from the town centre." I am concerned this will significantly increase traffic on Baytree Road. I feel that minimising the crossover is a false economy as the no right turn out of Baytree Road minimises traffic at the junction of Baytree Road and Acre Lane. Has a traffic survey been carried out to estimate the impact?	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.
Individual	R1497	Vision Map	I'm really worried about car access on Baytree road! It is already a massive issue to have the exit on our road! Having the entrance and	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			exit will cause major issues and mean queuing cars and other problems. Already we have issues and queuing cars with the exit. Please please please don't make it worse!	make this clearer. The customer car park would not be accessed from Baytree Rd. The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.
Individual	R1497	Context	I am very worried about the car situation on this proposal. I do not feel Baytree should be used as the entry and exit to the tesco. The idea makes me very anxious. We are a small residential street. It is narrow. The pollution in particular scares me.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The customer car park would not be accessed from Baytree Rd. The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.
Individual	R1506	Vision	Lambeth is the 2nd most densely populated area in the UK. Please do not build anymore homes in Lambeth as it is already overcrowded. Please leave housebuilding to other less populated areas in the UK.	Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten-year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use.
Individual	R1526	Site Allocation Policy	And just where are we supposed to shop while the area is being redeveloped?	Continuation of the supermarket provision on site during any future construction work is not a planning matter. If an application to redevelop the site is brought forward, the applicant may provide details of a temporary replacement store, but this is not a requirement.
Individual	R1526	Site Allocation Policy	And, like it or not, people do use cars when they have heavy shopping, and the current Tesco site provides the only available parking for the Brixton shopping area. I take it you don't actually WANT to drive shoppers away from Brixton? Because that's what you are about to do.	A reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. However, some car parking will be reprovided, with a focus on disabled parking and electric vehicle charging.
Individual	R1616	Vision	I am a resident of Baytree Road. I was very disappointed to find out about these proposals via one of my neighbours. Like others who have already commented, I had no idea these proposals were online until one of my neighbours mentioned it. Had this not been brought to my attention I would have been unable to comment before the deadline as I was not sent anything by post or email. A proposal of such scale and magnitude should have been communicated properly to all residents well ahead of the deadline to allow everyone to have their say.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.
Individual	R1616	Evidence	As a resident of Baytree Road, my primary objection to these plans is the proposed height of the buildings which will have a considerable	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			negative impact on this residential street. The buildings proposed will be up to 32 metres tall which will have a significant detrimental effect on the residents of Baytree Road in terms of overlooking, loss of privacy and loss of light	receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1616	Evidence	The new buildings would be entirely out of keeping with the character of the surrounding residential buildings, which are mainly two storey family homes. The height of the buildings should be decreased on all sides and the highest building should be at the furthest point from Baytree Road and Porden Road.	Comments Noted.
Individual	R1616	Evidence	Secondly, I am concerned about parking and the potential for increased traffic on Baytree Road. It is vital that the road is not used for service vehicles or customer cars, and more attention must be paid to the problem of parking. The current proposal aims for a 'meaningful reduction' of car parking for the supermarket, but it does not explain the impact of this on Baytree Road which already has very limited on-street parking. More worryingly, there is no mention whatsoever of parking for the residents of the '120-170 self-contained units' proposed. It is unrealistic to assume that none of these residents will own cars so where will they park and how will this impact the already limited parking on Baytree Road? This needs to be properly considered. In an area that is already suffering from high levels of air pollution, it is essential that there is no increase to traffic on this residential street which is primarily populated by young families and the elderly. To mitigate against what may well be unsightly new buildings significantly changing the aspect of many residents of Baytree Road and making them feel boxed in and overlooked, the potential for 'urban greening' must be increased. More trees should be planted on the boundary between Baytree Road and the site, in order to shield residents from the service entrance and high buildings proposed.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane. In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. A significant reduction in parking numbers must be secured on site, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement.
Individual	R1616	Evidence	I fully endorse the comments of residents of Baytree and Porden Road outlined in https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response
Individual	R1618	Vision	This makes good sense, the current format is both hugely ugly and a waste of space, a carpark this size is akin to something outside of London, and is total overkill, as evidenced by it being half empty even at	Support noted.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			weekends. Locally there is a Lidl with parking, Sainsbury's Clapham High St (also a massive car park really), and also Clapham South Tesco, plenty of provision for those that need to drive given all of those mentioned are within 5 minutes from this site.	
Individual	R1626	Vision	My father is a resident of Baytree Road but is not able to write in English hence I am writing for him. He is concerned that there will be a substantial increase in the volume of traffic on Baytree Road. This would be a nightmare as many of the residents walk in and around the local area. They are either elderly or families with young children and the increased traffic down or at the end of a very narrow road would cause congestion, an increase in pollution and make a quiet residential road very busy.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.
Individual	R1628	Vision	It is so sad to see so much more massive buildings in the area. I would love to see instead 3 bedroom house to accommodate for families (garden+small house). I think that the complex on Bleheims garden / Marlborough mews is so much better Lambeth lacks family and the fact that we are building apartments post COVID will not help to make our neighborhoods full of kids.	The mix of homes will be fully considered at the time a planning application is brought forward on the site. Local Plan Policy H4 'Housing size mix in new developments' will apply, which acknowledges the need for family accommodation, in particular family-sized affordable homes.
Individual	R1629	Vision	I wholeheartedly endorse the comments made here by residents of Baytree Road and Porden Road: https://bit.ly/3uXtLaU The consultation does not include sufficient details and has not taken the properties on Baytree Road into account. Changes to the development need to be made in order to respect local residents.	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response
Individual	R1629	Vision	We only found out about the development through neighbours.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the SADPD.
Individual	R1629	Vision	Access via Baytree Road would have a huge impact on residents and their safety	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The customer car park would not be accessed from Baytree Rd. The existing restrictions to prevent rat running on Baytree Road would remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.
Individual	R1630	Vision	As a resident of Baytree Road, I am really worried about the potential size of the building that is way too tall (compared to the rest of the buildings in the area) and that will overlook in our property. Baytree road	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response The existing retail servicing route would be retained, i.e. in from

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			should also remain a residential street so it should not be used as a servicing vehicles. More detail on this link : https://bit.ly/3uXtLaU	Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The customer car park would not be accessed from Baytree Rd. The existing restrictions to prevent rat running on Baytree Road would remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.
Individual	R1630	Site Allocation Policy	The potential new building should not be more than 4 floors height maximum to avoid overlooking at the existing properties in Baytree road and even being overly disproportionate compared to what already is in the area.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1630	Site Allocation Policy	Baytree road should not be used for access either for commercial cars or servicing vehicles.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The customer car park would not be accessed from Baytree Rd. The existing restrictions to prevent rat running on Baytree Road would remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.
Individual	R1630	Site Allocation Policy	Please take the local residence point of view before any decision is made: https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response.
Individual	R1630	Evidence	The potential 16m and 32m height buildings are overly high. They will impact the properties in Baytree roads (overshadow, overlooking at their properties) as well as the landscape in Brixton.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>residential accommodation on the site.</p> <p>The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.</p>
Individual	R1630	Evidence	Any potential building should remain within the 4-floor height maximum.	Comments noted.
Individual	R1630	Other	I fully support this response : https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response
Individual	R1632	Vision	Access through baytree will generate far too much traffic on a residential road.	<p>The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer.</p> <p>The customer car park would not be accessed from Baytree Rd.</p> <p>The existing restrictions to prevent rat running on Baytree Road would remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.</p>
Individual	R1632	Vision	The new properties will be overlooking straight in our properties.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1632	Vision	Parking on baytree road will become problematic. Construction will be very disruptive. Please take the local residence point of view before any decision is made. More information on our baytree road agreement doc: https://bit.ly/3uXtLaU	<p>Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted.</p> <p>The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>clearer.</p> <p>The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.</p> <p>In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.</p> <p>Any future planning application will be accompanied by a Transport Assessment, along with draft Delivery and Servicing Management, Construction and Environmental Management and Travel Plans. Full Plans will be secured and assessed via appropriate planning conditions.</p>
Individual	R1634	Vision	The vision is desperately vague in its wording and inspires the opposite sentiment to the one intended, that it in some way would improve the appearance of the areal have already commented that it makes the reader concerned that in fact it would have the opposite effect than the one intended - to improve the poor appearance of the area.	Comments noted.
Individual	R1634	Site Allocation Policy	I powerfully dislike it. It seeks to further densify the urban density of an already over-crowded, over-built up area.	Comments noted.
Individual	R1634	Vision Map	I think you are underestimating the scope and radius of catchment for sensitive neighbours	Applicants will have to show at application stage that their proposals do not have unacceptable impacts on the amenity of neighbours irrespective of what is shown on the map
Individual	R1634	Evidence	I think the height of the proposed development (21 metres) will cause extremely negative impacts on the aesthetics of the area.	<p>The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Any proposed development that comes forward would be also be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan and other relevant guidance.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R1634	Sustainability Appraisal	Marking your own homework with rose tinted glasses about the outcomes of your own development is far from impartial. I think the positives are wildly exaggerated.	Comment noted.
Individual	R1635	Site Allocation Policy	Firstly, as a resident of Baytree Road, who will be directly impacted by this development, I was extremely disappointed and angry to hear about this proposal from another neighbour. I received no notification from Lambeth either by post or email and find this disrespectful and feel that Lambeth has grossly fallen short on its duty to keep residents informed.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version
Individual	R1635	Site Allocation Policy	Secondly, the proposal does not adequately clarify or consider the problem of parking and the negative impact it will have on Baytree Road, a residential road, with many young families. While the proposal states that to achieve Local Plan and Transport Strategy objectives there will be a "meaningful reduction" of car parking associated with the supermarket, it fails to consider how this will detrimentally affect Baytree Road, where on- street parking is already limited. Moreover, there is no mention of where the residents of the new development will park which is equally worrying or whether all these cars will exit onto Baytree Road, raising more concerns about the volume of traffic on a residential road.	In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. The customer car park would not be accessed from Baytree Rd.
Individual	R1635	Site Allocation Policy	Thirdly, the height proposal of up to 32m is not in keeping with the context of a predominantly residential area and will impact neighbours to an "unacceptable" level.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1635	Site Allocation Policy	This development will result in a significant loss of light, privacy and view as the development will completely overshadow the existing properties on Baytree Road.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Any proposed development that comes forward would be also be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan and other relevant guidance.</p>
Individual	R1635	Site Allocation Policy	<p>Finally, the potential to enhance urban greening is clear but this should not be limited to Acre Lane as the proposal indicates. There should be additional urban greening on the boundary between Baytree Road/ Tesco as 3 existing trees is simply inadequate to shield the residents from the unsightly service entrance and blanket of black tarmac. I totally endorse the concerns outlined in https://bit.ly/3uXtLaU</p>	<p>Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation [number] for a full response.</p> <p>Any planning application which comes forward on this site will be assessed against Local Plan Policy EN1 'Open space, green infrastructure and biodiversity' which requires the delivery of urban greening. The Site Allocations Policy sets out the relevant Urban Greening Factor which will be required for the site.</p>
Individual	R1637	Vision	<p>I support making better use of the site, providing a high quality mixed use development and as a result linking Acre Lane back into the heart of Brixton.</p>	<p>Support noted.</p>
Individual	R1637	Vision	<p>But I am concerned by some aspects. First of all I think careful consideration needs to be given to parking. I am all in favour of less cars on the road however this is very hard to control. The new residential buildings adjacent to the Civic Centre have placed a strain on the local parking density, in particular on Porden Road. The solution at the time was to limit the number of parking permits issued to new residents but this is, of course, hard to justify in the long term. The new development on the corner of Baytree/Acre Lane and the replacement for Olive Morris House will compound this issue and parking for local residents will become harder. I think there needs to be a survey of traffic and parking on the local streets and an analysis of the use of the current Tesco car park and the results should be used to inform an overall parking strategy for the site and the adjacent streets with the impacts of all recent and planned developments taken into account. This may mean increasing the parking provision on the Tesco site.</p>	<p>In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.</p> <p>Any future planning application would be accompanied by a Transport Assessment which should include an assessment of the traffic and parking impacts of the proposals.</p>
Individual	R1637	Vision	<p>Secondly, I would like to see extensive provision of urban greening and preferably publicly accessible. The current site includes extensive hardscape and the new development provides an amazing opportunity to set this right.</p>	<p>Any future planning application that comes forward on this site would be assessed against the requirements of Lambeth Local Plan EN1 'Open space, green infrastructure and biodiversity'. this includes requirements for the provision of new on-site open space/access to nature improvements and the application of an Urban Greening Factor (as set out in London Plan</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				Policy G5) to indicate the required level of greening on site. New Biodiversity Net Gain requirements in the Environment Act 2021 will also apply to planning applications going forward. This will require new development to achieve a 10% net gain in biodiversity.
Individual	R1637	Vision	I am concerned by the service vehicle entry remaining on Baytree Road. It doesn't work well right now and it looks like the new slightly shifted location may be even worse.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. Any future planning application would be accompanied by a Transport Assessment which should include an assessment of the suitability of all access points, using swept path analyses of the largest expected vehicles.
Individual	R1637	Vision	And finally I would like to see a really high quality development by a top tier architect and with long lasting timeless materials. Some of the recent planning permissions given in the area seem unlikely to meet these standards and the Tesco site is too significant to have a poor quality development.	Lambeth policy seeks to ensure high quality design and the independent Lambeth Design Review Panel assists the Council by scrutinising schemes at pre-application stage.
Individual	R1637	Vision	I fully support the response submitted by the residents of Baytree and Porden Road at the following link: https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response.
Individual	R1666	Vision	Where is the car park. You are building a supermarket, and people need a car[ar] as they will be carrying heavy shopping, or are we to carry them on our heads like in poorer countries. You are narrowing the road, you say.does that mean the increase in more traffic Then you will blame the rise in pollution so you can get rid of the cars there all together! I am fine for the large supermarket, and housing, but your consequences for those will mean an attack on driving. Not happy with the intended consequences of these plans on motorists in general..	The policy provides for the retention of an appropriate level of retail car parking, with a focus on disabled parking and electric vehicle charging.
Individual	R1669	Site Allocation Policy	Quality public realm and after care with tree planting	Comments noted.
Individual	R1692	Site Allocation Policy	The site should not be more than 4-5 stories tall or else it'll be thoroughly out of keeping with the rest of the building in the area and remove sunlight to many homes around it	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').

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Individual	R1719	Vision	Unsure about the need for cramming in more housing to the area. Central Brixton is already very congested Proposed building height is far too high	Noted. Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten-year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use.
Individual	R1719	Site Allocation Policy	Baytree Road should not be used for access. It would be better off getting rid of the access currently on there and building some nice residential housing / coffee shop on the corner to improve the area at the end of the road	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The customer car park would not be accessed from Baytree Rd.
Individual	R1719	Vision Map	Change the access off Baytree Road	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The customer car park would not be accessed from Baytree Rd.
Individual	R1730	Vision	Although I am generally supportive of the addition of modern buildings to improve the landscape, projects of a 32m scale is too much. The overall size should not exceed 4 storey above the ground (including ground floor). I also stand by the comment of Baytree/Porden residents. https://bit.ly/3uXtLaU	Noted. Support for response submitted on behalf of Residents of Baytree Road and Porden Road is noted. Please see Representation R0324 for a full response.
Individual	R1730	Sustainability Appraisal	A big dimension of sustainability is the social aspect. As such, it is critical that projects of that scale are well communicated across all population types. I have encountered many people young or old who were not aware of the project (although they are directly impacted by it). The draft in the current form is not able to get an exhaustive set of comments from all Lambeth inhabitants. It is because we believe strongly in inclusivity that we are so happy to live in Lambeth. Unfortunately, this project stands out as an exception to this principle.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.
Individual	R1730	Evidence	Lambeth and especially Brixton Hill are far above the London average population density. It would make more sense to extend the tube further south than add buildings here and there to make the area a lot more dense. I also stand by the comment from Baytree/Porden road https://bit.ly/3uXtLaU	Noted, this is beyond the remit of this SADPD. The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane. In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				<p>parking permits to park on-street.</p> <p>Any future planning application will be accompanied by a Transport Assessment, along with draft Delivery and Servicing Management, Construction and Environmental Management and Travel Plans. Full Plans will be secured and assessed via appropriate planning conditions.</p> <p>Support for the response submitted on behalf of Residents of Baytree Road and Porden Road is noted. Please see Representation R0324 for a full response.</p>
Individual	R1730	Context	<p>As you mentioned it ("Behind the site along Baytree Road and Porden Road are two storey residential terraces. The south-east corner of the site tapers to a point between Arlington Lodge and Somerset Place, five storey blocks of flats."), this area is losing its heritage from the past. Brixton hill used to be a green area of small / mid-size house and this project would completely transform it to a overcrowded city center. I also agree with the comments from Baytree/Porden road: https://bit.ly/3uXtLaU</p>	<p>Support for the response submitted on behalf of Residents of Baytree Road and Porden Road is noted. Please see Representations R0324 for a full response.</p>
Individual	R1730	Vision Map	<p>I am ok with the building delimitation on this map as long as the overall building size does not exceed 9m (South) and 18m (North) to remain in the historical heights of the area.</p>	<p>Comments noted.</p>
Individual	R1730	Sustainability Appraisal	<p>Adding an underground parking will likely mean adding a massive ventilation that will affect the neighbours. Such a ventilation system should not be put on the East/South facing side of the complex to not create a noise/pollution nuisance (on top of all the other nuisances mentioned in the other comments). This should be clearly stated in the documentation.</p>	<p>No underground parking is proposed. The proposed allocation seeks to reduce the parking on the site</p>
Individual	R1730	Sustainability Appraisal	<p>I recently discovered this document: https://moderngov.lambeth.gov.uk/documents/s133344/Appendix%201%20-%20Draft%20Site%20Allocations%20DPD.pdf</p> <p>It says that the site 20 is not in an air quality focus area (page 71) which seems to be a mistake.</p> <p>Brixton hill is one of the 6 focus areas in Lambeth.</p> <p>Source: https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2016-air-quality-focus-areas#:~:text=The%20Focus%20Areas%20are%20locations,and%20for%20recasted%20air%20pollution%20trends</p> <p>The following image was extracted from that website: https://drive.google.com/file/d/1H-UKzFmIfLR0Vw829eadYOSIfaeXsz05/view?usp=sharing</p> <p>Considering the above, the increase in population density in this area will be very problematic from an air quality point of view</p>	<p>The site was incorrectly stated as being outside of an Air Quality Focus Area. The text and Vision Map will be amended to correct this. Any future planning application on this site will be assessed against London Plan Policy S11 'Air Quality' which includes specific requirements for sites within Air Quality Focus Areas.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R1738	Vision	We acknowledge and support the policy objectives for the site. It is currently underutilised and has the potential to create additional housing and improve the urban landscape.	Support is noted.
Individual	R1738	Vision	However the proposed development will be too dense and overbearing in the local context....	It is accepted that the indicative approach and resultant vision is taller than development in the context. However, the high accessibility of the site and its proximity to the town centre justify such an approach. The stepping up in massing along Acre Lane is in order to better integrate any proposal into its established context.
Individual	R1738	Vision	... and the servicing proposals for the supermarket are inadequate, anti-social and potentially dangerous.	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended to make this clearer. The existing restrictions to prevent rat running on Baytree Road would remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.
Individual	R1747	Vision	- In Acre Lane/ Brixton center, buildings have an average of 4/5 floors. Don't you think building such a high 9 floor building will totally change the landscape of Brixton and the area will totally lose its heritage from the past? A 6 to 9 floor building is totally disproportionate in this area and is total non-sense to my point of view.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Support for the response submitted on behalf of Residents of Baytree Road and Porden Road is noted. Please see Representation R0324 for a full response.
Individual	R1750	Vision	This response is provided on behalf of the owner and residents of [Redacted], which adjoins the proposed site location. While we are generally supportive of new residential properties in the area, including affordable housing,	Support is noted
Individual	R1750	Vision	we are concerned with the impact of the development on the area and adjoining residential roads (Porden Road and Baytree Road). The proposal lacks detail on the impact of the proposal on adjoining roads and we would expect significant further detail to be presented and for all residents in the area to be kept up to the date on the direction of the development. Key areas for concern and which we would expect and will be demanding further evidence on relate to (i) parking, (ii) height of development and impact on light and adjoining roads	The indicative approach has been revisited to ensure no unacceptable impacts on neighbour amenity. A summary report has been included in the evidence. The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording will be amended to make this clearer. The customer car park would not be accessed from Baytree Rd or Porden Rd. In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. The indicative approach has been informed by site constraint analysis to

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1750	Vision	and (iii) type of commercial properties that will be licensed/allowed in the development.	Any commercial uses proposed as part of an application on the site would be subject to the requirements of Lambeth Local Plan policies ED7 'Town Centres' and ED8 'Evening economy and food and drink uses'.
Individual	R1750	Vision	The current parking situation on Porden road is unsustainable, residents of Porden road find it almost impossible to park on their own street and this becomes completely impossible on Sundays (when residential parking only is not applicable), such that residents simply cannot drive on Sunday's. The plan therefore requires further detail on how the new residential properties on Porden Road and Baytree Road will be protected from new residents from the proposed development parking on their road, as given the size of the proposed development the parking and traffic in adjoining roads will become unsustainable unless specific actions are taken to avoid this.	In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street.
Individual	R1750	Vision	The height of the development seems very high and not in keeping with the area. We would like further detail and an assessment of the impact of the development on the light and privacy on the residents of Porden road. An 11m building backing onto Porden Road is too high and not in keeping with the heights of the properties on Porden Road.	The indicative approach has been revisited to ensure no unacceptable impacts on neighbour amenity. A summary report has been included in the evidence.
Individual	R1750	Vision	A number of properties have been designated for commercial use in the development. We need further detail on what the exact envisaged use will be. We would strongly object to the commercial property adjoining the corner of Porden road (beside n.2) being anything aside from a retail property, as there are already too many restaurant and bar amenities in the cross section of Acre Lane and Porden Road and the residents have suffered significantly as a result due to loud music being played, anti-social behaviour from revelers and littering on the street.	Other than the replacement supermarket, commercial uses shown the design evidence base document are indicative. Any commercial uses proposed as part of a future planning application on the site would be subject to the requirements of Lambeth Local Plan policies ED7 'Town Centres' and ED8 'Evening economy and food and drink uses'. ED8 sets out that evening and food and drink uses will not be permitted where this would cause unacceptable harm to community safety or the amenity of neighbouring residential areas, and that proposals for evening and food and drink uses should be accompanied by a management plan and a customer management plan, including mitigation measures for any negative impacts of these uses.

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R1762	Vision	The size of the buildings should be decreased extensively on every side. The highest part of the main building should not be so close to Porden and Baytree road. It should be limited to a small place on Acre lane.	The indicative approach has been revisited to ensure no unacceptable impacts on neighbour amenity. A summary report has been included in the evidence.
Individual	R1765	Vision	[address redacted] Baytree Road residents support the submission at this link https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response.
Individual	R1769	Vision	Any development will have a huge impact on the residents of Baytree Road if the advice given in this document is not listened to: https://drive.google.com/file/d/1GxvjsEQ4g0lQXTR1tGKm3qSXgoZ5yb1M/view	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response
Individual	R1774	Vision	As homeowners of the property in [Redacted] we are surprised to have only found out (by chance) about this scheme the day before "consultation" closes. Other residents in Porden Road and Baytree Road have pointed out the shortcomings of the scheme which is totally unsuitable for the site.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version. Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response.
Individual	R1791	Vision	As a resident of the northern side of Baytree Road and living immediately adjacent to the proposed allocation site, I wanted to raise my concerns when it comes to the Site 20 plan. The idea of the development is very worrying as the scale of the development and the height of buildings proposed in the initial consultation is beyond the height of buildings on Baytree Road and Porden Road – being 8m and 9m in height. In normal residential circumstances, the adjacent houses host a single-family and not a block of flats. Hence, the risk of significant overlooking, loss of privacy, and loss of light are very high under these circumstances.	The indicative approach in the evidence document has been assessed to ensure that the massing has no unacceptable impacts on the amenity (daylight / sunlight / overshadowing) of adjoining neighbours. Any application would have to meet the relevant planning policies in that regard.
Individual	R1791	Vision	Moreover, being positioned directly next to the site, the construction work of this property will affect my household's wellbeing for a prolonged period of time.	The impact of any demolition and construction will be considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming forward, as required by Local Plan Policy T7.
Individual	R1791	Vision	The proposal also mentions the servicing of the replacement supermarket should be accessed from Baytree Road. For a small	The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. The policy wording and map will be amended

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
			residential road to service, a shop like Tesco seems to be very unrealistic. Not only as the road is too narrow, but also the foundations of the road will not be sufficient to support a substantial increase in the volume of traffic on Baytree Road. This is a residential road that should serve its local families with elderly parents and young children.	to make this clearer. The existing restrictions to prevent rat running on Baytree Road would remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.
Individual	R1791	Vision	Moreover, the trees that are currently growing along the wall between Baytree Road residents and Tesco were not mentioned within the consultation and they are currently a big part of the landscape and a way to divide the private gardens from the site. They are of great value for the current residents and are expected to be retained.	The retention of trees will be dependent on their health, condition and other considerations. For that reason, the Council does not wish to explicitly state that particular trees must be retained. An applicant would be required to undertake detailed arboriculture assessments when development any proposal and work up a scheme which retains trees in accordance with British Standard best practice. Policy Q10 in the local plan will apply when proposals are assessed.
Individual	R1791	Vision	All in all, it is understandable that the Council is trying to improve the appearance of the site through high-quality design; however, the current residents of the adjacent properties should not be disadvantaged and pushed away from Brixton. I fully support and agree with every point raised in the collective response included here: https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response
Individual	R1814	Sustainability Appraisal	I fully support the comments made in the report SADPD Site 20 (Tesco): Responses from Baytree Road and Porden Road residents link: https://bit.ly/3uXtLaU	Support for the response submitted on behalf of Residents of Porden Road and Baytree Road is noted. Please see Representation R0324 for a full response.
Individual	R1840	Context Map	This may have a bad effect on my house at [Redacted], including light and noise.	The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Policy Q2 'Amenity' requires that the adverse impact of noise is reduced to an acceptable level through the use of attenuation, distance,

Officer Response to Reg 18 Representations: Site 20 – Tesco, 13 Acre Lane SW2

Respondent	ID	Draft SADPD Section	Comment	Officer response
				screening, or layout/orientation
Individual	R1840	Context Map	I also wonder what will happen to the vehicles of shoppers. I would like to object to this proposal.	The policy provides for the retention of an appropriate level of retail car parking, with a focus on disabled parking and electric vehicle charging.
Individual	R1868	Site Allocation Policy	Why do you want to fill this site with flood of flats?	Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten-year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use.

Officer Response to Reg 18 Representations: Site 21 – 51-57 Effra Road SW2

Respondent	ID	Draft SADPD Document	Comment	Officer response
Brixton Society	R0689	Other	Land Uses/ Employment Space: The Council's attempt to extend beyond their own Fitch Court site is opportunistic and damaging to the wider community. We are opposed to the loss of the Mosaic Clubhouse mental health facility and the Unitarian Church – the adverse impact on community services is excessive.	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.
Brixton Society	R0689	Other	Redevelopment of Fitch Court was proposed some years ago, linked to a possible replacement on Site 14. A replacement residential development within the existing site would be acceptable if the height and density are in keeping with the surroundings and social rented housing is at least 40%.	The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, as well as London Plan Policy H8 in regard to the redevelopment of affordable housing. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan. Local Plan Policy H2 will apply to any planning application brought forward on the site; this requires 70% of affordable housing delivered to be low-cost rent (social rent or London Affordable Rent). None
Brixton Society	R0689	Other	We were concerned about the original drive-in retail development carried out before the turn of the century, and the format does now look dated. However, it provides two useful retail shops of a scale that could not be accommodated within the nearby Brixton Town Centre, so their elimination must be resisted.	Retail is not part of the proposed mix of uses on this site as it is contrary to the objectives of Local Plan Policy ED7.
Brixton Society	R0689	Other	The adjacent Link Business Centre is an important concentration of small enterprises and voluntary-sector organisations, and should be safeguarded.	The Link Centre is outside of the scope of the proposed Site Allocation. It is safeguarded for business uses through designation in the Local Plan as a Key Industrial and Business Area and is subject to an Article 4 direction removing permitted development rights for the change of use to residential.
Brixton Society	R0689	Other	Building Heights, Views, Townscape: Building heights fronting Effra Road should not exceed 5 storeys. The proposed height of 13m on the eastern (rear) boundary is excessive. The maximum here should be 3 storeys and subject to maintaining adequate daylight and privacy for nearby housing in Dalberg Road, Masey Mews and Bailey Mews.	The indicative approach has been revisited and heights reduced. However, given the presence of the post-war slab blocks on the St Matthews Estate (opposite the site) a height greater than the suggested 5 storeys is considered acceptable. Especially given that development on the site will be set back behind Rush Common space. This is supported by the view modelling.
Brixton Society	R0689	Other	The references to retaining and enhancing Rush Common are welcome, but will be difficult to achieve if overall height and density are excessive.	The indicative approach has been revisited and heights reduced. However, given the presence of the post-war slab blocks on the St Matthews Estate (opposite the site) a height greater than the suggested 5

Officer Response to Reg 18 Representations: Site 21 – 51-57 Effra Road SW2

Respondent	ID	Draft SADPD Document	Comment	Officer response
				storeys is considered acceptable. Especially given that development on the site will be set back behind Rush Common space. This is supported by the view modelling.
Brixton Society	R0689	Other	Transport/ Public Realm: It is ironic that the Council is simultaneously promoting cycling borough-wide, while proposing to eliminate Halfords, a significant supplier of bikes and accessories for cyclists!	Comments noted.
Brixton Society	R0689	Other	If existing retail uses can continue, there is scope to reduce the number of shoppers' parking spaces, but the introduction of electric charging points would be welcome.	Parking provision in development proposals on existing car park should comply with the standards for the uses proposed and should not seek to replace or re-provide the parking spaces that existed previously. The proposal would need to provide electric vehicle charging in line with London Plan Policies. The policy wording will be amended to make this clearer
Brixton Society	R0689	Other	Even with changes of use, there will be a need for on-site servicing and delivery bays. The recent Railton LTN has increased traffic flows on Effra Road, so kerbside deliveries should not be relied on.	Servicing will be required on-site in line with Lambeth Local Plan Policy T7.
Brixton Society	R0689	Other	Access must be maintained to Masey Mews.	Access to Masey Mews from Effra Road will be retained.
Brixton Unitarian Church	R0005	Other	<p>I write on behalf of the Chairman and Trustees of Brixton Unitarian Church, Effra Road Chapel, 63 Effra Road, Brixton, London SW2 1BZ (founded 1839) to invite Lambeth to the above meeting at which all interested parties (including Effra Road Chapel and Lambeth) will be invited to discuss the Draft SPD on which responses are invited by Lambeth by 20th February at 11pm. The meeting will take place at the Chapel and refreshments will be served.</p> <p>The said Trustees have serious concerns with regard to what is proposed for Site 21 including 51 to 65 Effra Road, that is from North to South:</p> <p>the Effra Road Retail Park (where Halfords and Currys currently are; the last we looked owned by the Lancashire Pension Fund); Fitch Court (sheltered accommodation owned by Lambeth), Effra Road Chapel (owned by the Trustees, Brixton Unitarian Church), and the Family Mosaic Clubhouse (owned by Lambeth). This is based on our belief that this will make it easier for Lambeth Council or another developer to compulsorily purchase our site we have hallowed for coming up 183 years or force unwanted redevelopment upon us on most undesirable terms. Effra Road Chapel stands between Fitch Court and the Mosaic Club House, both owned by Lambeth; Lambeth Council has twice expressed an interest in buying our site in recent years but our Trustees have been obliged to conclude negotiations as a waste of time. On the last occasion they invited us to participate in a rather mediocre redevelopment. We replied via leading architects Panter Hudspith (with whom we are fortunate to have an association), who put forward a much more attractive alternative for all concerned increasing the</p>	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.

Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>housing yield for Lambeth. Negotiations were brought to a close, however, by our Trustees after Lambeth made a much-delayed offer to us based on a valuation comparison involving a piece of long unused wasteland by a railway track in Neasden (rather than a highly desirable ransom strip) and Lambeth's failure to respond to our response thereafter in a timely fashion. We had been in negotiations by that stage for about two years.</p> <p>We copy-in Panter Hudspith, our local councillors and other clearly interested parties asking them to kindly join us at 7pm on 8th February and to publicise this event.</p>	
Brixton Unitarian Church	R0005	Vision	<p>1. I am Julian Smith, the Minister of Brixton Unitarian Church, Effra Road Chapel, 63 Effra Road, Brixton, London, SW2 1BZ. I write on behalf of the Trustees of Brixton Unitarian Church who own the 'place of worship' this proposal seeks to replace, further to their consultation with the congregation, hall users (including Brixton Legal Centre and several black churches) and wider local community engaged with us.</p> <p>2. We have been the 'spiritual home to Brixton's freethinkers [and a support to the community more generally with a school etc for some time and other things] since 1839' and the layout of our estate and our buildings (including, to the rear, a 3 x bedroom manse and 2 x bedroom caretaker's bungalow in pleasant grounds used by the church in finer weather, especially for weddings, in addition to our thriving community hall), serve us very well.</p> <p>3. Which is hardly surprising. They are far from merely 'competent'. They are an extremely fine example of postwar mid-century church buildings, utilising even handmade bricks where the chapel itself is concerned, and are the design of the well-regarded architect Kenneth Tayler ARIBA responsible for several other post-war Unitarian ecclesiastical buildings in London and further afield, including several churches and Unitarian Headquarters itself on Essex Street just off The Strand.</p> <p>4. Incredibly we were not consulted prior to these proposals being formulated. That said, we have now looked at them carefully. Sadly we cannot see how our being included benefits us or the wider community for all we have tried with the benefit of professional input.</p> <p>5. It is extremely disappointing to us that Lambeth organised no local drop-in consultation on this for questions arising and, with all its resources and the importance of this proposal, failed to have even one member its paid staff available on several week's notice to attend the community meeting organised by us and scheduled for 7pm on 8th February 2022.</p>	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.

Respondent	ID	Draft SADPD Document	Comment	Officer response
Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make.</p>	Noted.
Natural England	R0163	General	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	Noted.
Mums for Lungs	R0501	Site Allocation Policy	<p>We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document.</p> <p>We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings.</p> <p>As acknowledged by Lambeth cabinet last November, "Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough." Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document.</p> <p>Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.</p>	<p>One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes'. These strategic overarching principles are also applicable to the SADPD PSV.</p> <p>The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy SI1. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.</p> <p>The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth's Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council's work.</p>

Officer Response to Reg 18 Representations: Site 21 – 51-57 Effra Road SW2

Respondent	ID	Draft SADPD Document	Comment	Officer response
Mums for Lungs	R0501	Transport	Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough. We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?	Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.
Mums for Lungs	R0501	Transport	In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal. Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It's equally essential for the Planning department of the council, its Transport department and TFL to work very closely together. Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO). We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us. With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth council so that they become a tangible, positive reality for everyone living and working in the borough.	In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking. Other London Plan policies will be applicable, such as Policy T1 'Strategic approach to transport', T2 'Healthy streets' and T5 'Cycling', that set the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.
Cllr Ben Kind (Labour)	R1144	Other	I welcome the opportunity to comment on a consultation to improve the contribution made by Site 21 to the Brixton community: I support this site being designated as not suitable for tall buildings.	As set out in the Site Allocation Policy, Local Plan Policy EN5 requires a Flood Risk Assessment for major development in this location. The FRA should consider mitigation through a Flood Alleviation Scheme where necessary which should ensure the flood risk overall.
Cllr Ben Kind (Labour)	R1144	Other	I have concerns about the negative impact of proposed building heights on the ground floor properties of the blocks on the St Matthew's Estate opposite. This should be addressed by limiting the height of all buildings	A daylight and sunlight study has been undertaken which supports the heights identified for the site. The indicative approach has been informed by site constraint analysis and has been tested at the level of general

Officer Response to Reg 18 Representations: Site 21 – 51-57 Effra Road SW2

Respondent	ID	Draft SADPD Document	Comment	Officer response
			fronting Effra Road, requiring them to be no taller than The Link business centre and for upper floors to be set back from the building line.	massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Cllr Ben Kind (Labour)	R1144	Other	Residents living in Masey Mews and Bailey Mews have expressed concern about being hemmed in by any future development. Measures to ensure development is sensitive to neighbours should be strengthened by specifically requiring building heights along the boundary with existing properties on Masey/Bailey Mews to be no taller than those existing properties.	The massing of the indicative approach has been revisited. The objective is to ensure no unacceptable effects on the amenity of existing neighbours. However, the request that height be no greater than the existing adjoining properties would too prescriptive and restrict the optimisation of the site. The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Cllr Ben Kind (Labour)	R1144	Other	I support the requirement for provision of light industrial workspace - but a requirement should be included to ensure this is affordable workspace. There should also be restrictions put in place to prevent future change of use from this use class.	Support for light industrial floorspace is noted. Lambeth's affordable workspace policy is set out at ED3 of the Lambeth Local Plan 2021. It applies to a net uplift in office floorspace in defined locations in the borough based on the viability evidence that was tested at examination. It does not apply to new light industrial floorspace because development values for that use were not found to be strong enough to justify an affordable workspace requirement. Local Plan policy ED3 would therefore not apply to the proposed approach set out in the draft site allocation for this site (a net uplift in office floorspace would not be supported). In accordance with Local Plan Policy ED4 and supporting text paragraph 6.42, any light industrial use that is brought forward could be secured as such through the use of conditions and/or planning obligations where necessary and justified.
Cllr Ben Kind (Labour)	R1144	Other	Mosaic Clubhouse at 65 Effra Road should be removed from the site allocation entirely. It is an essential service and should not be relocated in order to facilitate delivery of this site. There has been no discussion with the community on the future of Mosaic Clubhouse and this proposal could accelerate changes without community support.	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.

Officer Response to Reg 18 Representations: Site 21 – 51-57 Effra Road SW2

Respondent	ID	Draft SADPD Document	Comment	Officer response
Cllr Ben Kind (Labour)	R1144	Other	The level of affordable housing for the comprehensive site should be 50% and not 39%. A larger quantity of affordable housing provided on land in public sector ownership should be used to allow developers of privately owned land in Site 21 to contribute a lower amount of affordable housing than LBL policy.	The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan. In order to follow the Fast Track route, 35% affordable housing should be provided on privately owned sites and 50% affordable housing on publicly owned sites. The proposed 39% is an average based on the proportion of the site allocation in public/private ownership and will only apply should the site come forward comprehensively. Should planning applications be submitted on individual parts of the site, the relevant 50% or 35% threshold will apply. Any affordable housing provision below these thresholds will be subject to viability testing.
Cllr Ben Kind (Labour)	R1144	Other	No proposals should be brought forward regarding Fitch Court until existing residents there have moved into the promised improved sheltered housing on Somerleyton Road. Residents of Fitch Court should not be required to move more than once and any proposal for development of the site must cover the costs of supporting residents of Fitch Court in moving as well as compensate them for any inconvenience and distress caused. The provision of replacement sheltered housing off-site should not form part of any arrangements to reduce the amount of affordable housing within Site 21.	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Cllr Ben Kind (Labour)	R1144	Other	The proposals will require residents of Masey Mews who use vehicles to utilise a one way system that meanders through Site 21 to access their homes. This is unnecessary and Masey Mews should be retained as a two-way street for those residents.	Amendments have been made to remove vehicular access from Masey Mews and provide singular access point to the site. The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Cllr Ben Kind (Labour)	R1144	Other	Contributions should be required to be made towards extending cycle hire provision to suitable sites along Effra Road and to the Brixton Water Lane junction; implementing the raised table junction on Effra Road to reduce speeds and ensure safer crossings; and to contribute towards the provision of controlled crossings on all arms of the Brixton Water Lane/Effra Road/Tulse Hill junction whilst reinstating the left turn from Brixton Water Lane westbound into Tulse Hill (removing traffic from being diverted into Arlingford Road).	Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected impacts on the local road and public transport networks, with mitigation to be funded by the developer if required.
Cllr Ben Kind (Labour)	R1144	Other	Contributions should be required to be made to improve the bus stops on Effra Road to increase space for passengers waiting for services and set shelters back from the road.	Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected impacts on the local road and public transport networks, with mitigation to be funded by the developer if required.
Cllr Ben Kind (Labour)	R1144	Other	Contributions should specifically be required to address increased demand on local health and education services in the area resulting from this development.	The requirements of Local Plan Policy S2 in relation to new social infrastructure and assessment of anticipated impacts on existing social infrastructure would be applicable.

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Cllr Ben Kind (Labour)	R1144	Other	To reduce the negative harm on the setting of the Trinity Congregational Chapel on St Matthew's Road, contributions should be required to be made to enhance the maintenance and building structure of the Chapel itself. To minimise the negative harm on St Matthew's Church contributions should be required to be made to renew/maintain the railings of the churchyard and enhance the public realm within the Church Gardens at the southern end to reduce antisocial behaviour.	No harm has been identified to this asset.
Cllr Ben Kind (Labour)	R1144	Other	Where it states that Rush Common land should not be relied on to meet external amenity space for new housing, this provision should be strengthened by making it clearer that all amenity space (including appropriate space for childrens play equipment and older young people) should be provided on site and no proposal should include Rush Common, Brockwell Park, St Matthew's Church Gardens or the play areas on St Matthew's Estate in their calculations for amenity space.	The amenity space provided by any planning application that is brought forward on the site will be assessed against Local Plan Policy H5. The supporting text to this policy (para 5.34) sets out that proximity of a development site to an existing park or open space alone does not constitute a sufficient reason not to provide on-site external amenity space
Cllr Ben Kind (Labour)	R1144	Other	Improvements to Rush Common land should be required to be coordinated with tree Friends of Rush Common and should contribute more than grassed areas and trees. Particular attention should be made to minimising the opportunity for antisocial behaviour on Rush Common land along Effra Road and contributions should be required to be made to the installation and long term upkeep of the proposed St Matthew's and Rush Common Rain Ponds that form part of the Lambeth Bee Roads project.	Site Allocation Policy wording has been amended to encourage applicants to take a co-production approach to landscaping with Friends of Rush Common and other local stakeholders.
Cllr Scarlett O'Hara (Labour)	R0348	Other	<p>I write to object to the inclusion of the Mosaic Clubhouse within the Site 21 area and to support the submission of Chris Thomas, Chief Executive of Mosaic Clubhouse.</p> <p>Mosaic Clubhouse is a well-used and highly regarded provision for people experiencing mental distress or ill health. It offers a much-needed safe space in the heart of the borough. It is easy to find and to access direct from the main road.</p> <p>The Clubhouse is a light, airy, calm space providing a range of activities for its members/users, both indoors and outdoors. Thanks to the current spacious location activities are offered and enjoyed without impacting on neighbours. This means that the potential for safeguarding issues for the vulnerable users of the facility is reduced. Members of the Clubhouse may be distressed or even aggressive and this can be managed by the professionals here in a safe and secure environment. Having other users or residents in the same multi-functional building could cause additional stress and a range of further safeguarding issues.</p> <p>The landlord for this key facility should remain the local authority – Lambeth Council – who understand its significance and value and can ensure its use is protected and enabled to thrive.</p>	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.

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			<p>I also highlight the concerns outlined by Mr Thomas that any arrangement that involved the Clubhouse being temporarily relocated elsewhere during redevelopment, would cause distress to its users and could be potentially harmful to their care. It is important that members/users know exactly where to come to find a safe space and this would be complicated by a relocation.</p> <p>I recommend that this important and crucial facility be removed from the Site 21 plan, especially in a time of increasing -- rather than reducing -- mental health issues facing our residents. The remainder of the site would still be a viable and attractive location for developers.</p>	
Environment Agency	R0886	Other	<p>Current flood zone designation: 1 Rivers on / adjacent to site / flood defences: No Permitted waste site within 250 metres: No Groundwater Source Protection Zone: SPZ2 Comments to add into site allocation text: Protect groundwater from contamination sources</p>	Accepted. Text changed accordingly.
GLA	R0852	Other	<p>This site allocation supports the aims of the CEZ by replacing out-of-centre retail with community uses and light industrial floorspace. However, the allocation should refer to the requirements of policy E3 Part A LP2021, specifically for affordable workspace for sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace.</p> <p>Due to the borough's location within the CSA, the allocation should incorporate the need to provide essential services to the CAZ in accordance with paragraph 6.4.7 of the LP2021. These services include sustainable last mile distribution/logistics, 'just-in-time' servicing among others.</p> <p>The references to incorporating children and young people-friendly features such as play-on-the-way parallel playable routes are supported. This is in line with the Mayor's Healthy Streets approach and LP2021 Policy S4.</p>	<p>London Plan policy E3A makes clear that planning obligations may be used to secure affordable workspace in defined circumstances set out in parts B and C of the policy. Parts B and C refer to areas and policies identified in Development Plan Documents. Lambeth's affordable workspace policy is set out at ED3 of the Lambeth Local Plan 2021. It applies to a net uplift in office floorspace in defined locations in the borough based on the viability evidence that was tested at examination. It does not apply to new light industrial floorspace because development values for that use were not found to be strong enough to justify an affordable workspace requirement. Local Plan policy ED3 would therefore not apply to the proposed approach set out in the draft site allocation for this site (a net uplift if office floorspace would not be supported), which is why it is not referenced.</p> <p>London Plan paragraph 6.4.7 is noted and was fully acknowledged throughout the preparation and examination of the Lambeth Local Plan 2021. However, it does not follow that every site in use as non-designated industrial land with potential for mixed use redevelopment will be suitable for sustainable 'last mile' distribution/logistics, 'just-in-time' servicing, waste management and recycling or uses to support transport functions. It would not therefore be reasonable to require all sites to provide these uses.</p> <p>This site is tightly constrained and it may be difficult for an applicant to include these types of uses, rather than light industrial workspace, alongside residential. To require them in this case could render the site undeliverable. It should also be noted that this site is within the Brixton CEZ, so the priority requirement would be for light industrial space suitable for creative and digital enterprises. It is very unlikely the site could</p>

Respondent	ID	Draft SADPD Document	Comment	Officer response
				accommodate both that type of space and uses that service the CSA. Support for approach to incorporating children and young people-friendly features is noted.
Helen Hayes MP for Dulwich and West Norwood (Labour)	R0698	Other	I welcome the recognition that Site 21 is not an appropriate location for tall buildings, given the sensitivity of the historic environment in Brixton Town Centre. I also welcome the principle that the out-of-town, car based form of retail development which currently dominates this site could be replaced with a more sustainable mixed use form of development, which can provide new homes as well as retail and employment.	Support noted.
Helen Hayes MP for Dulwich and West Norwood (Labour)	R0698	Other	I strongly object to the inclusion of Mosaic Clubhouse within the boundary of Site 21. Mosaic Clubhouse provides a unique recovery and rehabilitation environment for people with mental health conditions including a cafe and training kitchen, office space, a garden and activity spaces. Mosaic Clubhouse also provides a highly valued night time crisis service. We should all be proud of Mosaic Clubhouse and the support they provide to Lambeth residents. The Mosaic Clubhouse building is relatively new and purpose-built, providing a fantastic environment for those who use it. There is simply no justification for demolishing this building, even if it was to be reprovided. It should therefore be removed from Site 21.	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Helen Hayes MP for Dulwich and West Norwood (Labour)	R0698	Other	I understand that there is a longstanding aspiration to re-provide the sheltered homes at Fitch Court on the Somerleyton Road site. I believe that Fitch Court should only be proposed for redevelopment if and when the new homes have been built and the current residents of Fitch Court moved into them. Complex land-swap arrangements create fear and uncertainty for residents and increase the risks associated with development	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Individual	R0179	Other	I am one of the members who attend the Mosaic Club. Please I would kindly request to leave the Mosaic in its original layout as per your plans. This is because this place is motivating to our wellbeing.	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Individual	R0229	Other	As a member of Mosaic Clubhouse I am writing in relation to the above draft development plan which affects our current Clubhouse site. I understand that the draft development plan mentions that any new development will have to provide equivalent community facilities, but given the unique role played by Mosaic Clubhouse, I believe the plan should make clear that Mosaic Clubhouse itself should be protected. I was hailed a hero for my actions in trying to save a life on Westminster Bridge when the terror attack occurred. I was left with PTSD and unable to work. Mosaic Clubhouse has restored my mental health and upskill. Our building and the facilities we have at Clubhouse are vitally	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.

Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>important to the work that members do to support our recovery and wellbeing. It is therefore important that the next draft of the development plan makes clear that our new facility should include:</p> <ul style="list-style-type: none"> • At least the same amount of indoor space, with key facilities such as our kitchen and canteen • At least the same amount of outdoor space, with good lighting so we can grow vegetables and enjoy time outdoors • Our own separate entrance from the street • Parking for our minibus and for our disabled members • The facilities needed to comply with Clubhouse International standards, so that we can maintain our status as a global leader <p>It will also be really important to ensure that any future building rent is affordable, and that there is provision to ensure it won't rise beyond what we can afford.</p> <p>I know from my own experience that Mosaic is a lifeline, and closing the building (as we had to in Covid-19) causes real issues, so it is vital that the policy requires that Mosaic will not be asked to move out of our current premises until any new building is ready for us to move in. Thank you for considering these important points.</p>	
Individual	R0443	Other	<p>As a supporter of Mosaic Clubhouse and a local Lambeth resident I am writing in relation to the above draft development plan which affects the current Clubhouse site.</p> <p>I understand that the draft development plan mentions that any new development will have to provide equivalent community facilities, but given the unique role played by Mosaic Clubhouse, I believe the plan should make clear that Mosaic Clubhouse itself should be protected. It is critical that Mosaic Clubhouse remains and thrives as part of the local community, serving Lambeth people with life saving mental health support. It is critical therefore that the planning policy is strengthened to explicitly protect the characteristics of this unique facility.</p> <p>The building and the facilities we have at Clubhouse are vitally important to the work that members do to support recovery and wellbeing. It is therefore important that the next draft of the development plan makes clear that the new facility should include:</p> <ul style="list-style-type: none"> - At least the same amount of indoor space, with key facilities such as the kitchen and canteen - At least the same amount of outdoor space, with good lighting so we can grow vegetables and enjoy time outdoors - Own separate entrance from the street - Parking for the minibus and for our disabled members - The facilities needed to comply with Clubhouse International standards, so that we can maintain our status as a global leader 	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.

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Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>It will also be really important to ensure that any future building rent is affordable, and that there is provision to ensure it won't rise beyond what we can afford.</p> <p>I know from my own experience that Mosaic is a lifeline, and closing the building would cause real life changing issues, so it is vital that the policy requires that Mosaic will not be asked to move out of their current premises until any new permanent facility is ready to move in.</p> <p>Thank you for considering these important points.</p>	
Individual	R0532	Other	<p>This is to let you know I am extremely concerned about the redevelopment of land around Brixton, including the plot that Mosaic Club is on! This is a club that is a lifeline for those who have mental health issues. They support Lambeth residents with their mental health which is very important especially now. Because of the last two years there are more and more people that need help.</p> <p>I strongly urge the Lambeth Council not to redevelop the land on proposed site 21.</p>	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Individual	R0669	Other	<p>I understand that there are proposals to redevelop the site along Effra Road, Brixton which will have an impact on MC (Mosaic Clubhouse) - a safe space for those who are recovering from mental ill health.</p> <p>As a member I have benefitted from the help and support of the staff along with the fantastic facilities, physical environment and space. It is important that we have the same amount of indoor /outdoor space for health and safety reasons as well as the mental wellbeing of members and myself. For example, our H&H (Horticulture & Hospitality) unit provides members with the opportunity to gain life, employability and social skills such as cooking, cashiering, table service, growing herbs and vegetables and the therepeutic value cannot be under estimated. A shared community entrance, car parking or amentities would risk lead to me isolating and becoming more unwell due to increased anxiety, fear and paranoia when the charity wants to foster a spirit of hope, healing and connection.</p> <p>We are a charity and without this facility and the support of our partners I would not be in a position to write this email and make good progress with my mental health recovery.</p> <p>I hope you take my concerns into consideration when you draft the next proposal.</p>	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Individual	R0673	Other	<p>As a friend and community group of Mosaic Clubhouse I am writing in relation to the above draft development plan which affects our current Clubhouse site. I understand that the draft development plan mentions that any new development will have to provide equivalent community facilities, but given the unique role played by Mosaic Clubhouse, I believe the plan should make clear of the main specifications that</p>	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.

Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>Mosaic Clubhouse itself should be protected. What specifications and how it should be protected for the future of the clubhouse and its needs to be able to function or meets the international standards. We have been a friends of Mosaic Clubhouse since 2014 June, I attend many events and worked together with the club house to support their members within and beyond. This extended network and connections have made life changing difference to many Mosaic members, my community group and locals.</p> <p>The well being of the broader and wider community is what we are aiming to support. To many, it is a life line to a better life ahead. The building and the facilities they currently have at Clubhouse are vitally important to the work that members do to support our recovery and wellbeing. It is therefore important that the next draft of the development plan makes clear that our new facility should include:</p> <ul style="list-style-type: none"> - At least the same amount of indoor space, with key facilities such as our kitchen and canteen - At least the same amount of outdoor space, with good lighting so we can grow vegetables and enjoy time outdoors - Our own separate entrance from the street - Parking for our minibus and for our disabled members - The facilities needed to comply with Clubhouse International standards, so that we can maintain our status as a global leader <p>All of above are equally vital and important to ensure the services, workshops and classes can be accommodated at this site. The lighting and outdoors area reflects and meets the needs for peace and practical workshops. Which many members of Mosaic Clubhouse needs for their recovery and skills developments. It will also be really important to ensure that any future building rent is affordable, and that there is provision to ensure it won't rise beyond what we can afford. I know from my own experience that Mosaic is a lifeline, and closing the building (as we had to in Covid-19) causes real issues, so it is vital that the policy requires that Mosaic will not be asked to move out of our current premises until any new building is ready for us to move in. Because every single day the club house is closed, means many vulnerable members will be deprived of care, support and means of keeping their wellness and recovery.</p>	
Individual	R0766	Other	<p>I emailing you to about development plans. I want Mosaic clubhouse to stay in Brixton and not close down. Mosaic has improved my mental health.</p> <p>t</p>	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Individual	R0840	Other	<p>As a staff member at Mosaic Clubhouse I am writing in relation to the above draft development plan, which affects our current Clubhouse site.</p>	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.

Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>I understand that the draft development plan mentions that any new development will have to provide equivalent community facilities, but given the unique role played by Mosaic Clubhouse, I believe the plan should make explicit that Mosaic Clubhouse itself must be protected. In the 18 months I have worked here, I have seen first hand the enormous benefit that the Clubhouse serves to our members. We see over 50 members each day, and the opportunity to forge connections and take part in meaningful work provides a unique recovery service not found elsewhere in the area. We are proud to see the progress our members make, and often see people feel ready to return to work and education after attending for a number of months.</p> <p>Our building and the facilities we have at Clubhouse are vitally important to the work that members do to support our recovery and wellbeing. It is therefore important that the next draft of the development plan makes clear that our new facility should include:</p> <ul style="list-style-type: none"> • At least the same amount of indoor space, with key facilities such as our kitchen and canteen • At least the same amount of outdoor space, with good lighting so we can grow vegetables and enjoy time outdoors • Our own separate entrance from the street • Parking for our minibus and for our disabled members • The facilities needed to comply with Clubhouse International standards, so that we can maintain our status as a global leader <p>It will also be really important to ensure that any future building rent is affordable, and that there is provision to ensure it won't rise beyond what we can afford.</p> <p>I know from my own experience that Mosaic is a lifeline, and closing the building (as we had to in Covid-19) causes real issues, so it is vital that the policy requires that Mosaic will not be asked to move out of our current premises until any new building is ready for us to move in. Thank you for considering these important points.</p>	
Individual	R0904	Other	<p>I have a [Redacted] which currently backs on to the rear car park of PC World in Brixton (the eastern corner of the proposed site). The sunlight which comes into the garden in the afternoon will be eradicated by the development; and indeed little daylight will now come into the flat from the north side. The amount of natural light in the property and rear garden was, unsurprisingly, a key factor in my purchase of the property. To varying degrees, this significant reduction in light is the case with all other flats in blocks 1-3 Masey Mews. What consideration has been given to this in the proposal?</p>	<p>The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to</p>

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Respondent	ID	Draft SADPD Document	Comment	Officer response
				daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R0945	Site Allocation Policy	"Replacement community space of equivalent or better functionality to that already on the site and equivalent affordability to the occupiers" Club House Mosaic moved from Atkins Rd and transformed the Effra Rd building into a wonderful uplifting place with its integral gardens. How will it be replaced & improved in Site 21?. It will be an overhead cost to the developer who has to subsidize the replacement Of Club House Mosaic in their slice of Site 21. Why not exclude Club House Mosaic building from Site 21 map?	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Individual	R1257	Other	I live on Tulse Hill estate. I am totally disturbed by the proposals for specifically Sites 18 and 19 along with Sites 7, 17, 20 and 21 and, to be honest, the whole plan!!! I feel that it's as if Lambeth Council is living in a dream and that as long as words like 'affordable housing' and 'flexible workspace' are used, you can carry on with simply carrying on. It's as if you have not noticed that we are living in a climate emergency!! All building needs to stop. There are alternative solutions!! Housing can be created by refurbishing buildings that already stand. We don't need more workspace - flexible or otherwise.	Lambeth Council declared a Climate Emergency in January 2019. Mitigation of, and adaptation to climate change is a very high priority for the Council and is also central to the planning process, both in planning policy and decision-making. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation. This includes transport policies seeking car-free development and encouraging active travel (Local Plan Policies T1-3 and T6); policies encouraging Urban Greening and the protection of open spaces (London Plan Policy G5 and Local Plan Policy EN1) and trees (Local Plan Policy Q10); and policies setting out requirements for sustainable design and construction (Local Plan Policy EN4) and improving air quality (London Plan S11). A full list of development plan policies addressing climate change mitigation and adaptation can be found in Lambeth Local Plan 2021 Evidence Base document 'Topic Paper 7 – Climate Change'. These policies and guidance are in addition to the existing and emerging new requirements through the Building Regulations regime, such as the emerging Future Homes Standard. All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.

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Individual	R1257	Other		<p>Planning applications proposing development on this site will be subject to circular economy principles, which favour retaining and retrofitting over substantial demolition. London Plan Policies D3 and S17 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For applications that meet the criteria for referral to the Mayor of London (e.g. development of 150 residential units or more or over 30 metres in height) an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. Referable applications are also required to be accompanied by a comprehensive Whole Life Carbon assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as finding mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, both these assessments are strongly encouraged. In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction. There is considerable demand for workspace in Lambeth, as set out in the Lambeth Local Plan 2021 evidence document 'Topic Paper 3 – Workspace'</p>
Individual	R1257	Other	<p>These thoughts go along with my personal view that there has not been enough public consultation - we needed to see real plans. I am very disturbed by your ignorance - you ignore the state of the planet, you ignore the people, you ignore your responsibilities and - I just get the impression that as long as you can keep going with your plans, nothing else will matter. I object. Strongly!! I feel that</p> <ul style="list-style-type: none"> • there has been no adequate public consultation on these plans, 	<p>Consultation on the Draft Site Allocation DPD was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.</p>
Individual	R1257	Other	<ul style="list-style-type: none"> • the buildings contravene Lambeth's own planning rules, 	<p>The Draft Site Allocations DPD aligns with Lambeth Local Plan 2021. The approach to the SA DPD is also consistent with that set out in section 11 of the NPPF 2021 on making effective use of land, and paragraph 23 on allocating sufficient sites to deliver strategic priorities of the area.</p>
Individual	R1257	Other	<ul style="list-style-type: none"> • these developments overall would harm local communities and life itself. It's time to be creating a whole new way of living and some places are doing exactly that. Have you heard of Doughnut Economics? Have you even considered a complete change of plan that would be more suitable to a planet that needs help and a system that needs change? 	<p>Comments noted and addressed above.</p>

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			<p>You are damaging the environment, destroying mature trees, breaking up communities and more. You seem to be blind, ignorant and/or stupid. I apologise if that sounds rude but - I'm freaking out here as our lives are in your hands!!!</p> <p>Lambeth has been doing damaging processes similar to these for a long time. When will you start to care and act like reasonable, responsible people? How can you carry on making a total mockery of your own declaration of a 'climate emergency.' You claim to be a 'co-operative council' but it seems that there is no thought or vision for the community or for Lambeth as a whole.</p> <p>Please, hold some real consultations and think again. Please, take care of the people who voted you into position. Consider people and planet over profit. Stop working with only the property developers and start working for and with THE PEOPLE!!!</p>	
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party</p>	Noted.

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			<p>councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>

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			efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.	
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> • Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO₂e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO₂e output. - 4-5% of the worldwide total of CO₂e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution • Steel Steel also has a significant impact on the environment: - It is CO₂e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke 	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and S17 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			<p>dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement:</p> <ul style="list-style-type: none"> • Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit “off-gas” toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. • Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world’s riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber. 	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> • Overheating, caused by the proliferate use of glass and a high concentration of inhabitants • Increasing carbon energy required to offset this through mechanical ventilation • Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) 	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led</p>

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			<ul style="list-style-type: none"> • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise ‘skyscraper’ buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p> <p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p>
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council's commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs,</p>	Noted. Please refer to officer responses to previous points made as part of this representation.

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			<p>children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <p>1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p> <p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p> <p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	

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Individual	R1347	Sustainability Appraisal	Deliveries to retail & residential & other uses to be located on dedicated reallocated CPZ space in adjoining streets. This is to maximise the development & as access to car storage makes it more likely that people will own & drive cars, reduce potential car use, in line with Lambeth's commitment Climate goals	Servicing will be required on-site in line with Lambeth Local Plan Policy T7. The Development will be secured car free in line with London Plan and Lambeth Local Plan policies. The policy wording will be amended to make this clearer. There is no proposal to remove existing CPZ space outside of this site for any development.
Individual	R1348	Site Allocation Policy	The information does not make it clear whether the retail stores would be included in the development. They are very useful to the retail offer in Brixton and I wouldn't want to see them go. They provide useful alternative to Amazon.	Comments noted. Retail is not part of the proposed mix of uses on this site as it contrary to the objectives of Local Plan Policy ED7.
Individual	R1355	Vision	Think this would really improve the neighbourhood! Love it!	Support noted
Individual	R1365	Evidence	Although there is info about how views from Brockwell Park and several neighbouring street will or will not be impacted, the impact on views from the Brixton Water Lane Conservation Area is noticeably absent, even though the CA is directly between the development & Brockwell Park. In the interests of transparency, please address this. I believe an 8 storey building would negatively impact the BWL Conservation Area.	Comments noted however the impact on views not considered necessary because of the alignment of the Brixton Water Lane Conservation Area (BWLCA) being west-east and intimate in character. We are therefore confident there would be no visibility in the key views west/east. There are no views of note north of the BWLCA and therefore even if glimpsed the proposed development is unlikely to have an effect especially given the dense nature of the housing on the north side of BWLCA.
Individual	R1369	Vision	More green space is important for Brixton	Comment noted
Individual	R1398	Vision	The Rush Common lands included within the parcel must be retained as open green space - not parking, and not excessively overshadowed.	The site allocation policy is clear that the Rush Common open space should be retained and enhanced, and any existing hardstanding removed.
Individual	R1399	Evidence	Need to be more creative around the design of the indicative approach. Having homes facing directly on to one of the busiest roads, is not good for the health of the residents due to the pollution. Place the buildings perpendicular to the road.	Buildings parallel to the road are a key aspect of Brixton's local distinctiveness and important in reinstating the building line. The set back behind the Rush Common land will help the noise and air quality conditions to a degree. Other policy requirements, such as requirements for dual aspect flats, will be beneficial in this regard.
Individual	R1406	Vision	it's not clear how much housing is proposed.	It is anticipated that the site can accommodate between 85 - 95 dwellings based on an indicative assessment of site capacity. The indicative approach has been updated since the Regulation 18 draft consultation version of the SADPD. The exact number of dwellings will depend on proposals drawn up by applicants and their architects, which will be subject to assessment at the time a planning application is brought forward.
Individual	R1423	Vision	The council should not be funding places of worship. What will the 'affordable' housing be? Will it actually be affordable to people who've lived their whole lives in brixton and lambeth? £400k one-bedroom flats are not affordable!	The Unitarian Church land has been removed from the proposed Site Allocation. It was not proposed that the council would fund development on this site. Affordable housing delivered as part of the redevelopment of this site will be required to meet the definition of genuinely affordable as set out in London Plan Policy H6 'Affordable Housing Tenure'
Individual	R1425	Evidence	Why are you destroying this retail park and where are they supposed to go or is Lambeth council driving out local business again.	Retail in this location is contrary to the objectives for Local Plan Policy ED7
Individual	R1460	Vision	I'm concerned that this is just marketing speak to justify cramming a lot of residential property into a small space. I doubt they will be developed in keeping with the architectural look of the local area.	Comments noted.

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Individual	R1467	Vision Map	The houses north of Eurolink business centre, particularly those part of the Brixton Conservation Area, should be designated as sensitive residential areas.	Comments noted.
Individual	R1467	Vision Map	Additionally, the new access/service route should not be open to through traffic by vehicles, as this is intended to be a project with limited car accessibility given the high PTAL score in the local area	Amendments made to remove vehicular access from Masey Mews.
Individual	R1467	Site Allocation Policy	There is a large amount of low lying ground in the area near the site, which is at significant risk of surface water flooding. This is particularly important to the area given the effect of climate change and the recent flooding seen in areas of London after periods of heavy rain. Planning obligations regarding Flood Alleviation Schemes are crucial, and should require a net improvement in surface water runoff to benefit the broader area. A flood alleviation scheme that raises thresholds for development on the site but results in a worsening of flooding for neighbouring properties would be unacceptable.	As set out in the Site Allocation Policy, Local Plan Policy EN5 requires a Flood Risk Assessment for major development in this location. The FRA should consider mitigation through a Flood Alleviation Scheme where necessary which should ensure the risk of flooding elsewhere is not increased.
Individual	R1467	Site Allocation Policy	In addition to attention given to residential neighbours at Masey Mews, Bailey Mews, and Dahlberg Road, attention should be given to heritage assets such as the former Synagogue and residential properties to the north of the site, which form part of the Brixton conservation area. As such, the current plan of stepped development rising from 4 stories to the North and East rising to 8 stories in the southern part of the development is acceptable, with the intended gradient of rise stated in the Site Allocation Policy.	The opposite side of Effra Road is characterised by noticeable steps in height between character areas which is not considered problematic in this context. Modelling has shown that the general effect of the Indicative Approach massing is successful.
Individual	R1467	Site Allocation Policy	As per the Site Allocation Policy, vehicular traffic should not dominate the site. The intention to slow cars through use of a meandering route is positive, but a better solution would be to have a single access point for cars into the site, with either a one way system through the north of the site, or cars being prevented from travelling through the north of the site with the northern access point to Effra Road being reserved for pedestrian, cycle and motorcycle travel.	Amendments made to remove vehicular access from Masey Mews and provide singular vehicular access point to the site.
Individual	R1467	Site Allocation Policy	Given the very high PTAL score for Brixton and the congestion around St Matthew's Roundabout, the site could be a car free site and should at the very least keep car ownership low.	Local Plan and London Plan parking standards will apply. PTAL 6a supports a car free development. The policy wording will be amended to make this clearer.
Individual	R1467	Site Allocation Policy	Additionally, on street parking should be kept at minimal levels - if car ownership onsite is to be high, this should generally be in shared garages.	Local Plan and London Plan parking standards will apply. PTAL 6a supports a car free development. The policy wording will be amended to make this clearer.
Individual	R1467	Site Allocation Policy	Given the trend for converting houses into blocks of flats and resulting issues with provision of family housing, attention should be given to the provision of three bed flats and houses suitable for children and families in the Allocation Policy.	The dwelling mix will be in accordance with Local Plan Policy H4 which requires that between 15-30% of affordable housing should be 3+ bedrooms and a balanced mix of unit sizes, including family sized accommodation, should be provided for market/intermediate housing.

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Respondent	ID	Draft SADPD Document	Comment	Officer response
Individual	R1467	Vision	I am strongly supportive of turning this low-utilisation residential site into housing, particularly for families, in an area which has a high public transport score and good services for families and children.	Support noted.
Individual	R1467	Vision	It should be designed to allow for significant improvements to the Brixton public realm.	Comments noted.
Individual	R1467	Sustainability Appraisal	Site 21 has a very good PTAL score, and is in a location ideal for cycling with lots of cycle infrastructure. Additionally, it is in an area which can suffer from significant congestion. As such, point 9 in the sustainability appraisal is particularly important, with the requirement to ensure that this is a car free development for those people who do not suffer from disabilities. This requirement should be made clear in the Site Vision and Constraints.	Local Plan and London Plan parking standards will apply. PTAL 6a supports a car free development. The policy wording will be amended to make this clearer.
Individual	R1468	Vision	Leave it exactly as it is. NO HIGHRISES	The site is identified as not appropriate for tall building development.
Individual	R1470	Vision	As a local resident, I strongly support these plans. I am happy to welcome new residents and new businesses to town. I believe that these developments will help me enjoy and use the space more.	Support noted.
Individual	R1501	Vision	I have have just read this out loud to a senior town center planning specialist who advises local authorities across London and the UK. We both agree that is a meaningless policy buzzword soup. But very Lambeth.	Comments noted.
Individual	R1521	Vision	It will completely take away the sun from the gardens that back onto the property! How can that be allowed!!!	The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance.
Individual	R1522	Site Allocation Policy	Extremely concerned about the impact on already existing housing and specifically the height of proposed new builds. The light and 'sky view' of local housing already there will be devastated.	The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result. The indicative approach has been informed by site constraint analysis and has been tested at the level

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				of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance.
Individual	R1522	Site Allocation Policy	Concerned about the impact of ongoing building work and increased traffic etc in the immediate area.	The site would need to be car free, with vehicle traffic from the site limited to predominately delivery/servicing vehicles or accessible car parking. Construction logistics details would be provided within a Construction Management Plan to demonstrate arrangements for construction traffic and how environmental, traffic and amenity impacts will be minimised.
Individual	R1522	Site Allocation Policy	Unhappy about the loss of greenery and established trees.	No proposed loss of greenery and trees within the site allocation.
Individual	R1523	Vision	I live in Masey Mews and garden will back into this - This removes tonnes of natural light into our garden and the flat itself - if built it will also mean we lose direct sunlight in the summer 3/4 hours earlier then we currently do	The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan

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				(policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance.
Individual	R1523	Vision	Extreme noise and building works right outside my bedroom especially when I work from home.	The impact of any demolition and construction will be considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming forward, as required by Local Plan Policy T7
Individual	R1523	Vision	I am extremely concerned about the height of the building and people overlooking into our garden also which is currently private and which we have a hottub in.	The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1525	Vision	Extremely dissatisfied and opposing to this.	Comments noted.
Individual	R1527	Vision	I live locally to this site and am very supportive of proposals to develop this site. It has always struck me that such an enormous site where the Halfords and Curry's sits is a real under utilisation. This is a huge site that could much more effectively benefit the local community.	Support noted.
Individual	R1627	Vision	Stop building new flats in Brixton, there are too many already the area is overcrowded !!! They are also not affordable, everyone knows it is a lie the affordability of these new build , it is a smokescreen to hide Lambeth profiting by selling its land.	Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten-year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use. Affordable housing delivered as part of the redevelopment of this site will be required to meet the definition of genuinely affordable as set out in London Plan Policy H6 'Affordable Housing Tenure'

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Respondent	ID	Draft SADPD Document	Comment	Officer response
				The Council as Local Planning Authority has a duty to enable and support sustainable development through the planning process, as set out in national planning policy. The Council can, in some circumstances, make use of its own assets to help deliver its objectives for sustainable and inclusive growth, either by bringing forward development directly or by working in partnership with others.
Individual	R1627	Site Allocation Policy	Shame on Lambeth for profiting by selling its land and lying about it. Every new build has the same reasoning behind to convince people but the reality is Lambeth council is destroying our areas and community.	<p>The Council as Local Planning Authority has a duty to enable and support sustainable development through the planning process, as set out in national planning policy. Paragraph 11 of the National Planning Policy Framework (NPPF) sets out that the development plan 'should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects'.</p> <p>The Council has brought forward draft site allocation policies for a number of sites known to have development potential in the borough, to set out the parameters for achieving sustainable development, to ensure key strategic and local place-making objectives are delivered and to make sure important public benefits are secured.</p> <p>The Council can, in some circumstances, make use of its own assets to help deliver its objectives for sustainable and inclusive growth, either by bringing forward development directly or by working in partnership with others.</p> <p>Please note the Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.</p>
Individual	R1678	Site Allocation Policy	This site is not suitable for tall buildings; even 29m is too tall. Buildings of this height will overshadow the neighbours and will completely change the feel of the neighbouring streets.	The Site allocation does not include tall buildings. The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result. Testing on townscape has identified no adverse effects.
Individual	R1678	Site Allocation Policy	The centre of Brixton is already being filled with towers; there needs to be a point where that stops.	The indicative approach does not include any tall buildings.
Individual	R1678	Site Allocation Policy	Please prioritise re-homing the existing uses on site before anything. There are really important community assets on this site including a church and Mosaic clubhouse. These will struggle to relocate without affecting current users. It would be incredibly disappointing if these were replaced with coffee shops, restaurants or co-working spaces. Brixton doesn't need any more of that.	The Mosaic Clubhouse and Unitarian Church as well as Fitch Court have been removed from the proposed Site Allocation.
Individual	R1699	Site Allocation Policy	I am a local resident on effra road. I object to more houses on effra road - this is a HUGE quantity of new housing, and the infrastructure can't handle it: a. the pavement is already not wide enough.	Any future application would be accompanied by a Transport Assessment which would include a trip generation analysis, including an assessment of the expected impacts on the local road and public transport networks, with mitigation to be funded by the developer if required.

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Respondent	ID	Draft SADPD Document	Comment	Officer response
			B. The buses are already full as there is no tube south of brixton, c. the road is already grid locked due to the LTNs. I can't find a button to officially object, only 'make a comment'. But I want to object!	
Individual	R1781	Vision	Not needed. Too much of the area is being built up.	Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten-year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing in the borough on a number of sites that have potential for this use.
Individual	R1781	Vision Map	Very concerned about the change in road access and the level of traffic this would increase on an already busy area.	The site would need to be car free, with vehicle traffic from the site limited to predominately delivery/servicing vehicles or accessible car parking.
Individual	R1781	Context Map	Concerned about the height of proposed buildings and overlooking of existing properties.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1784	Site Allocation Policy	The proposed development will increase traffic on to effort road which already has very poor air quality whilst the proposed link through to Masey Mews will also increase traffic on a road used by school children from Masey Mews	Amendments made to remove vehicular access from Masey Mews and provide singular vehicular access point to the site.
Individual	R1784	Context	The development will have a negative impact on my flat	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and

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				D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1799	Vision	Mosaic Clubhouse is a mental health centre in site 21 and a unique and valuable place. It provides community, purpose and opportunities for people who may not otherwise have these. It keeps people out of hospital, and supports them to live fulfilling lives. Please ensure that any redevelopments continues to house it.	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.
Individual	R1811	Vision	We don't have any sun and now with this building will block the only sun we have.	The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1812	Site Allocation Policy	My name is [Redacted] and I am a member of Mosaic Clubhouse. When you redevelop Lambeth, please make a nice clubhouse for us to move into. Members at clubhouse like me need a nice clubhouse to feel happy, to feel comfortable, to feel happy and to help with mental health and make us feel at home. My illness would get worse without clubhouse. I would have nothing to do. I would be at home doing nothing. (I have typed this comment with the support of my engagement worker at Mosaic)	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.
Individual	R1829	Vision	I don't believe the sites have any relation to Rush Common and therefore is a moot point that should be removed.	The frontage of the site is designated as part of Rush Common.
Individual	R1829	Vision	Any green space would be restricted or hidden from the public, and if not, should be due to the private nature of the development,	Noted. Any proposal that is brought forward on the site will be required to provide private external amenity space in line with and Local Plan Policy H5 'Housing standards' and play space in line with London Plan Policy S4 'Play and informal recreation' and associated guidance. Open space should be provided in accordance with Local Plan Policy EN1(d) 'Open Space,

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Respondent	ID	Draft SADPD Document	Comment	Officer response
				green infrastructure and biodiversity'. This requirement is in addition to the requirement for external amenity space under Policy H5(b). For the purposes of Policy EN1, open space may be public or private and details of proposed open space will be assessed at the time a planning application is brought forward. Any redevelopment of the site would be required to make improvements to the existing Rush Common open space which is public open space.
Individual	R1829	Vision	lack of proper through roads (a u-shape is not a through road) and can add to antisocial noise	Amendments have been made to remove vehicular access from Masey Mews and provide singular access point to the site. The site would need to be car free, with vehicle traffic from the site limited to predominately delivery/servicing vehicles or accessible car parking.
Individual	R1829	Vision Map	The U Road will add excessive traffic to the existing masey mews, which is currently only accessible to residents who are met with gates at either Masey Mews or Fitch Court, therefore speed and turning is kept very low. Having an entry and exit will give this the potential for increased speed, lack of safety for children and pedestrians, and have the possibility for two-way traffic, vastly increasing vehicular activity in a quiet and residential road, of which Masey Mews was promoted as having. There is no reference to direction of traffic, lanes, road furniture or access restrictions on this plan.	Amendments made to remove vehicular access from Masey Mews and provide singular vehicular access point to the site.
Individual	R1829	Site Allocation Policy	Rush Common is not on this site. Reference should be amended.	The frontage of the site is designated as part of Rush Common.
Individual	R1829	Site Allocation Policy	Daylight, both direct and indirect is already at a premium on the north facing flats in Masey Mews. This is particularly noted in the ground floor flats where gardens are rarely in direct sunlight. This is especially true in winter. In summer, the low level of Curry's allows for direct sunlight for a few hours in the afternoon. Anything built taller than this will render direct sunlight impossible for the garden flats and will greatly impact the residents. General daylight will also be severely impacted by any, but especially tall (2+ stories) buildings built in the rear of the site currently occupied by the carpark. This is mean the flats, especially the ground floor flats will be in increased, if not almost eternal shade of which is currently is not.	The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant

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Respondent	ID	Draft SADPD Document	Comment	Officer response
				guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
Individual	R1829	Site Allocation Policy	This is not to mention being overlooked on currently private and open views. This would impact the privacy and right to relaxed living from windows and doors/balconies.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').
Individual	R1829	Site Allocation Policy	No mention has been specially made to the wasteground between the site, Masey Mews, and Dalberg road, which is currently held via the council and acts as both a buffer, tree space, security and stag beetle nesting site, which is a protected species. This legally needs to be looked into urgently.	Any detailed application will be subject to the requirements of Local Plan Policy EN1 which seeks to prevent harm to the nature conservation or biodiversity value of open spaces.
Individual	R1829	Site Allocation Policy	heights should range from approximately 13m in the east to approximately 26-29m to the west and be stepped and arranged to avoid unacceptable impacts on neighbour amenity. Anything above the existing height of currys on the south western area of the site to the north of Masey Mews will have a direct and significant impact on the ground floor neighbours of Masey Mews.	The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result.
Individual	R1829	Context	The site, notably the carpark next to masey mews is on a lower level than Masey Mews gardens. This needs to be addressed on how the boundaries will be maintained, levels either kept or changed, and any changes in the structure of the fencing. Buildings close to the boundary, and and reference to how this affects the residents (who are majority shared ownership homeowners) Information and insight into how antisocial behaviour, noise and security on the site, especially on properties bordering Masey Mews needs to be given.	These are detailed matters best left for detailed design development at planning application stage.
Individual	R1842	Vision	I strongly believe we need more affordable housing in Brixton. I am concerned however that the development of this site doesn't negatively impact those of us living in Masey Mews where the proposed site surrounds us on 3 sides. In particular the amount of daylight for properties that currently back on to the Curry's site - this could be significantly improved with more landscaping at the back of the proposed development and a limit on building height/closeness to avoid us being significantly overlooked.	The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a

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Respondent	ID	Draft SADPD Document	Comment	Officer response
				design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing. It will also be required to demonstrate an acceptable response to privacy, outlook and sense of enclosure constraints. Proposals will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide.
		Vision	I'm concerned that the impact on Masey Mews isn't currently reflected in these documents, given we could be surrounded by building works for a significant period from a proposed development on this site and for those who work from home/have children there are serious noise and air pollution concerns.	All construction brings with it a degree of inconvenience for neighbours. Construction impact management is fully considered at application stage when detailed schemes are proposed. The impact of any demolition and construction will be considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming forward, as required by Local Plan Policy T7.
Individual	R1855	Evidence	Concerns with reference to building heights for Masey Mews and Dalberg Rd residents .	The indicative approach has been subject to daylight and sunlight testing to ensure that no unacceptable impacts result.
Individual	R1855	Evidence	Maintaining the green strip with trees between east of site and Dalberg Rd.	The only green strip here is formed by trees in the rear gardens of the Dalberg Road properties. These are not within the site.
Individual	R1855	Evidence	Building in a broad green corridor to the west of the site fronting Effra Rd maximising and implementing large tree species planting scheme.	Comments noted. This is the Rush Common land which we wish to see retained and enhanced.
Individual	R1855	Evidence	Ensuring biodiversity net gain is maximised for the site.	Protecting and enhancing biodiversity in Lambeth is a key objective of the council. London Plan Policy G6 and Local Plan Policy EN1 seek to protect, enhance, create and/or manage nature conservation and biodiversity interest in accordance with the borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy. Local Plan Policy EN1 seeks to resist development that would result in the loss, reduction in area or significant harm to the nature conservation or biodiversity value of an open space unless adequate mitigation or compensatory measures are included, appropriate to the nature conservation value of the assets involved. This can be secured through s106 planning obligations as set out in Local Plan

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				Policy D4. In addition, the new Biodiversity Net Gain requirements in the Environment Act 2021 will apply to planning applications going forward. This will require new development to achieve a 10% net gain in the biodiversity.
Individual	R1855	Evidence	Need to view a comprehensive site specific environmental impact assessment for the proposal rather than a generic borough wide strategy.	An Environmental Impact Assessment may be required for certain types of development listed in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. If required, the council will undertake a screening to determine if an Environmental Impact Assessment necessary. This process would take place when a detailed proposals for the site are developed.
JLL on behalf of LPPI	R0180	Other	<p>Intro</p> <p>The representation is made on behalf of LPPI Real Estate Fund, managed by Knight Frank Investment Management ("LPPI") who have an interest in the Effra Road Retail Park on Effra Road, Brixton (SW2). The site comprises two out-of-town retail units currently occupied by Halfords and Currys. Together, the two units form a single, conjoined site which is part of a larger proposed site allocation that is identified as 'Proposed Site 21: 51-65 Effra Road SW2' – Section 3 pages 79-92 of the Lambeth Draft SADPD.</p> <p>It is important to note that the site which LPPI has an interest in forms part of a wider site allocation. For the avoidance of doubt, the land to the south that makes up the wider site allocation is under separate ownerships and LPPI has no control or commercial attachment to the land in the wider site allocation. This representation is therefore primarily concerned with the two aforementioned retail units and not the land and buildings to the south within the wider site allocation which is under completely separate control and ownerships.</p> <p>The two retail units that form LPPI's interest are identified by the red line on the aerial image below:</p> <p>[image]</p> <p>As shown on the Draft Lambeth SADPD excerpt below, the extent of the Proposed Site Allocation 21 includes additional land outside of LPPI's interest (the two retail units are located within the northern half of the site allocation as shown on the plan excerpt below):</p> <p>[image from SADPD]</p> <p>Vision: Proposed Site 21 (P84)</p> <p>The Draft Lambeth SADPD sets out the broad vision for how the wider site should be redeveloped:</p> <p>[quotation from SADPD]</p> <p>It is noted and welcomed that the site allocation recognises the redevelopment opportunity and the commitment to delivering a high-quality, mixed-use development on the site. We also welcome the</p>	Comments noted.

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			commitment to providing new housing and employment opportunities that complement and integrate well within the existing residential area. The commitment to creating a strong sense of place that reflects and enhances the local distinctiveness of this part of Brixton is also welcomed and supported.	
JLL on behalf of LPPI	R0180	Other	We also support the retention of the existing green space at Rush Common as an important landscape buffer to any future development proposal(s). However, the Rush Common land is an existing area that is already planted with trees which should be retained. Given that this space already exists, we request that the word 'new' is removed from the text above when referring to "new green space and trees" (line 7).	Reinstating the historic building line presents the opportunity to enlarge and enhance the green space along the site frontage beyond the pure extent of the Rush Common boundary. The site allocation requires that additional open space is provided in accordance with Local Plan policy EN1(d) and encourages opportunities for street trees and additional green infrastructure. These objectives are in addition to the requirement to retain and enhance the existing Rush Common open space. Therefore, the wording of the vision statement is considered appropriate.
JLL on behalf of LPPI	R0180	Other	<p>Development Themes Land Uses (P86)</p> <p>The Draft Lambeth SADPD recognises the challenges of bringing forward a site that contains a range of different existing uses and – in the case of the land to the south, multiple ownerships. The LPPI land is within single ownership, is not 'land-locked' and is capable of being brought forward for development completely independently of the land to the south within the proposed site allocation.</p> <p>It should therefore be explicitly acknowledged within the supporting text for the site allocation that sites can come forward independently of one another so long as they demonstrate how they could fit in with the wider site allocation and do not prejudice other sites from being developed. It is crucial to the success of the wider vision that individual applications can be brought forward for the relevant land parcel independently of one another. This will ensure that should any one land parcel within the site allocation encounter any complications or require a different delivery timetable, it does not unfairly prevent other sites within the site allocation from coming forward independently from the others.</p> <p>It is also crucial that when individual land parcels come forward, they are only required to address policies that are relevant to the existing land use(s) and issues on each individual land parcel. For example, there is no community uses on the LPPI land and therefore no replacement community use should be sought on this land parcel. The wording of the Site Allocation should make this clear to enable individual land parcels to come forward independently of one another. Furthermore, the quantum of development that can be achieved across the site should not be limited. Instead, housing numbers should be determined by a 'design-led' approach which optimises housing delivery on sites. This is in line with Lambeth's adopted Local Plan Policy H1:</p>	<p>The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation</p> <p>The Land Uses section of the proposed site allocation policy addresses the fact that given multiple land ownerships, the site may come forward in phases. It is considered that this provides sufficient clarity. The site boundary has been altered so that the existing community uses have been removed from the proposed site allocation. Therefore, there is no requirement for re-provision on any part of the site. The land use section has been amended to clarify that London Plan Policy H8 will apply for proposals involving the existing affordable housing on site. The Site Allocation policy sets out indicative parameters for development of the site, based on high-level testing of the optimum development capacity that could in principle be accommodated on the site, using a design-led approach in accordance with London Plan Policies D1B(3) and D3.</p> <p>Applicants and their architects will need to undertake a further detailed assessment of site capacity when designing proposals for submission as a planning application, informed by the parameters set out in the site allocation policies and other relevant policies in the development plan. While provision of some light industrial floorspace is a requirement of the proposed Site Allocation, there is flexibility around the location.</p> <p>The requirement for workspace to be appropriate to the Brixton Creative Enterprise Zone aligns with the objectives of Local Plan Policy PN3(e). It is considered that the proposed wording provides sufficient clarity that the affordable housing requirement will be assessed for the extent of the site that is being proposed for development.</p>

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			Maximising housing growth which seeks to 'maximise the supply of additional homes in the borough to meet and exceed Lambeth's housing requirement of 13,350 homes for the ten year period 2019/20 to 2028/29'.	
JLL on behalf of LPPI	R0180	Other	<p>The site allocation also refers to the site's potential to accommodate 'an element of flexible, light industrial workspace at the northern end of the site'. Whilst we would not want to rule this out at this stage in the process, we would also like to ensure that there is flexibility on this point to ensure that a viable and deliverable scheme can be brought forward. Appropriate employment uses should not be restricted only to any one specific demographic or sector. Failure to allow flexibility could impact on scheme viability and deliverability.</p> <p>Affordable Housing (P86)</p> <p>It is welcomed that the site allocation recognises that the land is in different ownerships with some in private and some in public ownership. This distinction is important and each land parcel within the site allocation should be assessed on a case-by-case basis as a standalone application to determine the appropriate level of affordable housing to be provided on each site without prejudicing the viability of any other sites.</p> <p>The supporting text must make clear that sites will be treated on a case-by-case basis. This will ensure transparency and will ensure development sites can be brought forward in a timely manner to avoid unnecessary delays that could impact on site viability and deliverability.</p>	
JLL on behalf of LPPI	R0180	Other	<p>Building heights and views; townscape (P87)</p> <p>We strongly disagree with the imposition of a maximum height of 'approximately 26-29m' on any part of the land within the site allocation. Instead, appropriate heights should be governed by detailed design and technical analysis of the site within its context and responding to the relevant site constraints and opportunities. We are strongly opposed to an arbitrary limit on height which could inhibit innovative solutions and approaches to height, massing and density being found which may be required to help unlock the full development potential of this site.</p> <p>We would advocate the rewording of this section that removes any reference to an upper height limit. Instead, the wording should focus on finding design-led solutions that are supported by technical analysis of key elements such as strategic / local views, daylight / sunlight impact, overlooking, and appropriateness for the locality.</p> <p>This approach is supported by adopted Local Plan Policy H1:</p> <p>Maximising housing growth which seeks to 'maximise the supply of additional homes in the borough to meet and exceed Lambeth's housing requirement of 13,350 homes for the ten year period 2019/20</p>	The heights have been identified through detailed analysis and are not arbitrary. They have been identified through detailed assessment of a number of constraints including local views. They are not arbitrary. See evidence base.

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			to 2028/29'. Failure to remove this arbitrary upper height restriction could render the entire site allocation unviable and ultimately undeliverable. A more flexible approach to upper height limits will enable innovative design solutions to be found. Any application for a taller building within this site allocation will still need to be rigorously tested as part of the scheme development and planning application determination process and should not be prematurely restricted in height. The reference to an upper height limit must therefore be removed to ensure proposals that are viable and deliverable can be brought forward.	
JLL on behalf of LPPI	R0180	Other	Transport, movement and public realm (P88) It is recognised that this is a well-connected site with good access to public transport and the facilities and services of Brixton Town Centre a short distance to the north of the site. It is therefore welcomed that the supporting text seeks to minimise the number of vehicular crossing points over Rush Common and enhance the pedestrian experience in this location. A car-free, pedestrian-focussed experience is welcomed in this location.	Comments noted.
JLL on behalf of LPPI	R0180	Other	Energy and Sustainability (P89) The current landowner is committed to the principles of sustainable development and therefore welcomes the aspiration to 'maximise the contribution to achieving net zero emissions on site rather than through off-setting'. Scheme Viability Although not explicitly mentioned in the supporting text of the Draft Lambeth SADPD, the site allocation should support the use of a Financial Viability Appraisal (FVA) so that a balance between site aspirations and scheme viability can be found. Where a scheme cannot viably support all elements of the site allocation, some flexibility should be allowed to ensure that the wider aspirations for this important site with the Creative Enterprise Zone can be realised. This will ensure that scheme proposals within the site allocation remain viable and deliverable.	Comments on Energy & Sustainability are noted. The London Plan threshold approach to viability will apply to proposals brought forward on the site. This allows for viability testing for applications that provide affordable housing that is below is below the threshold level.
JLL on behalf of LPPI	R0180	Other	Conclusion In conclusion, we are supportive of Lambeth Borough Council's recognition of the site's redevelopment potential for a mixed-use development. However, to ensure that schemes can be brought forward on the site, it is crucial that the following points are addressed: - It must be possible for different land parcels within the wider site allocation to be brought forward independently of one another - A flexible approach to the range of uses on the site(s) should be encouraged which will help support the wider redevelopment	Concluding comments are noted and addressed above.

Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>aspirations of the site allocation</p> <ul style="list-style-type: none"> - Any reference to a maximum quantum of development and upper height limits should be removed to ensure creative, design-led solutions can be found - Scheme viability should be considered in determining the appropriate mix of uses and/or affordable housing on the site(s) - The LPPI site is not publicly-owned land and the affordable housing requirement for this land parcel should be 35% and not 50% (as would be required on publicly-owned land) 	
Mosaic Clubhouse	R0182	Other	<p>We are writing to you, as a precautionary measure, to object to the proposed allocation affecting the above site. We have no objection to the basic objective of the Council to deliver a greater density of development in this area so as to facilitate more housing especially affordable housing but any such allocation/development must be consistent with and not prejudice our current use of our premises.</p> <p>Mosaic Clubhouse</p> <ol style="list-style-type: none"> 1. Mosaic Clubhouse is a mental health charity that provides purpose and opportunities for Lambeth residents living with a mental health condition. 2. Mosaic's approach is built on the internationally recognised Clubhouse model, which embeds co-production between staff and members throughout all activities - members are positively engaged in providing the services and support they need. 3. The Clubhouse offers its members a wide range of opportunities Monday to Friday; access to education and employment services and the chance to work with staff to help deliver our programmes. Seven nights each week, we run a crisis support service; The Evening Sanctuary . Mosaic also runs an information and signposting service, open to all Lambeth residents living with mental ill health. 4. Mosaic Clubhouse was established in 1994 and we have occupied our current site at 65, Effra Road, SW2 since 2013. We are the only internationally accredited Clubhouse in the UK. Mosaic is one of only 12 Clubhouses in the world offering 'Colleague Training' to staff and members of other clubhouses in Europe and beyond. 	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.
Mosaic Clubhouse	R0182	Other	<p>Number of Staff</p> <p>5. Mosaic Clubhouse is a key community employer, with 26 full-time staff running our daytime service and the Evening Sanctuary crisis service.</p> <p>Our members</p> <p>6. Membership at 21st January 2022 was 332. The average daily attendance between September and December 2021 was 50 individual members using our services every day. Some of our members only use</p>	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.

Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>our services for a short period during a mental health crisis or similar; others have used been regular visitors for many years; others still use us as and when the need arises.</p> <p>7. Approximately 10% of our current members have very significant, long term mental health needs that require constant and strong support in the community - we provide that.</p> <p>8. Our members can self-refer to us but more commonly are put into contact with us by mental health professionals, the housing team of the Council or by social services. We have an open door policy providing support to any Lambeth residents over the age of 16 who need it and can benefit from it and who can supply a risk assessment from a GP, social worker or mental health care co-ordinator.</p> <p>Mosaic is a "key existing community use"</p> <p>9. Mosaic Clubhouse is a key existing community use building near the geographical centre of Lambeth. We are a crucial part of the mental health provision for Lambeth, with the service we provide jointly commissioned by Lambeth Borough Council and South East London Clinical Commissioning Group (NHS).</p> <p>10. Furthermore, the rooms and facilities at the Clubhouse are regularly used by Lambeth Council and NHS colleagues. Mosaic provides employment and information services which form part of borough wide strategies in these areas.</p> <p>Mosaic meets a significant and clear need</p> <p>11. There was an average daily attendance of 50 between September and December 2021. We expect this figure to quickly rise to pre-Covid 19 pandemic levels of 75 individuals each day. Mosaic Clubhouse is "home from home" for approximately 20 individuals who are not only living with serious mental illness but isolated with little or no other social contacts. They use the Clubhouse as their only daily opportunity to engage with others, access wrap around support and eat a good meal.</p> <p>12. The Clubhouse is of fundamental importance to the wellbeing of all 332 of our members</p>	
Mosaic Clubhouse	R0182	Other	<p>Mosaic accommodation needs</p> <p>13. The current premises adequately meet our needs at a reasonable and affordable cost. Members are able to access freely and without any potential for conflict with other residents. On the site we have large rooms and outdoor spaces which allow for the full range of our activities uncurtailed by the amenity requirements of neighbours. Examples of activities which we carry out, and which could cause impact for neighbours if any new facility is not properly arranged to design out these issues, are daily maintenance and gardening tasks conducted by</p>	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.

Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>members, social activities and health and sports and activities such as keep fit classes.</p> <p>14. Occasional issues with distressed members or aggressive behaviour are appropriately managed without any impact on adjoining neighbours. This is important to our members because it is their safe space and it is vital that they can access support in private and secluded space.</p> <p>15. The requirements for the space a Clubhouse should occupy are set out in the International Clubhouse Standards which form part of our accredited status with Clubhouse International (based in New York, NY, USA). Standard 12 and 13 provide clear guidance; "Space emphasizes the importance of creating a dignified, attractive environment where important work is carried out."</p> <p>12 The Clubhouse has its own identity, including its own name, mailing address, email and telephone number.</p> <p>13. The Clubhouse is located in its own physical space. It is separate from any mental health center or institutional settings, and is impermeable to other programs. The Clubhouse is designed to facilitate the work-ordered day and at the same time be attractive, adequate in size, and convey a sense of respect and dignity."</p> <p>16. The plan for the building, including the current room sizes is in the attached plans. These were submitted to Lambeth Council during the planning application to develop the site in 2012.</p> <p>17. The clubhouse building is single storey and has large rooms which benefit from natural light. The offices and work rooms are connected by two corridors on the north and south sides of the building. There are three outdoor spaces used for growing vegetables and fruit and for eating and meeting spaces in the summer months.</p>	
Mosaic Clubhouse	R0182	Other	<p>18. All these features are necessary because Clubhouse standards are clear that we must look after the health and wellbeing of our members and promote healthy living. Having outdoor space for fresh air and producing our own vegetables are an important feature of our work and rehabilitation programme. Clubhouse Standard 28 is clear: "28. The Clubhouse provides assistance, activities and opportunities designed to help members develop and maintain healthy lifestyles."</p> <p>Indoor space:</p> <p>20. Any replacement Clubhouse will need to safely accommodate the current staff team size and the attendance of at least 50 members every day. The minimum for a like for like replacement building would include:</p> <p>a. A commercial kitchen (currently 34.3m²) and cafe area (currently 71.5m², able to seat up to 25 people at any time.</p> <p>b. A quiet area to accommodate up to 10 people in the Evening Sanctuary service. This is currently housed within the cafe area at the</p>	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.

Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>front of the building.</p> <p>c. Two large multi purpose work rooms able to flexibly accommodate around 20 computer workstations and space for classes, meetings and workshops. The two current spaces are 75.Sm2 and 120.2m2</p> <p>d. A separate space in which to operate our Information Hub signposting service (currently an office of 39m2)</p> <p>e. 7 smaller offices and meeting rooms for four to six people - used for small classes,one to one meetings,study spaces etc.</p> <p>f. Store rooms, changing areas for the cafe team, toilets including one suitable for wheelchair users, and a shower room, all of which can be seen in the plans of our current building attached.</p>	
Mosaic Clubhouse	R0182	Other	<p>Outdoor space</p> <p>21. Mosaic Clubhouse currently uses three outdoor areas;a small patio area adjoining the cafe (43.2m2), a small space with a greenhouse and raised beds for vegetable growing (31.1m2) and a larger paved outdoor space which can seat 20 people at picnic tables with borders of trees and ornamental plants,with sheds for gardening equipment. This space as seen in the attached site plan,runs the width of the rear of the building. These spaces are integral requirements of our Cafe and Gardens Unit which provide training and experience in working in the food, horticulture and hospitality sector. As this is an important part of our rehabilitation practice, we will require like for like or better provision of outdoor space in any new premises.</p> <p>22. You are welcome to visit our premises at anytime to see the nature and intensity of the current use. Please arrange a visit with us in advance.</p>	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.
Mosaic Clubhouse	R0182	Other	<p>Other neighbouring uses to be compatible with our use</p> <p>23. The Clubhouse is currently situated next to the Unitarian Church to the north and social housing to the south,with a car park and gardens to the road on the western edge of the site. We require similar arrangements in any new location. Industrial uses would not be compatible with our service.We need to have our open spaces and open windows in a secluded and private areas for the reasons already set out.</p>	
Mosaic Clubhouse	R0182	Other	<p>Car parking</p> <p>24. Mosaic Clubhouse owns a minivan which is necessary to transport our members. We will require parking for this vehicle. We also have six car parking spaces and a further two spaces reserved for 'blue badge' holders. A minimum requirement will be space for our van and the two spaces reserved for disabled users.</p>	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.
Mosaic Clubhouse	R0182	Other	<p>Clubhouse location</p> <p>25. We understand that in any comprehensive redevelopment there</p>	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.

Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>may be a need to temporarily relocate away from our present site or to decant us from our present location into our new permanent home elsewhere in the development.</p> <p>26. However, it is appropriate and necessary for us to continue to be housed (even on a temporary basis) on the wider site.</p> <p>27. Mosaic Clubhouse is in the centre of Brixton. It is on several bus routes and within easy walking distance of Brixton underground and rail stations. The Clubhouse serves the whole of Lambeth and it is vital that it remains centrally located and easily accessible for our members.</p> <p>28. Even temporary accommodation away from our current location would cause major difficulties both for our continued operation and provision of service and for our members and their ability to access the support of the Clubhouse.</p>	
Mosaic Clubhouse	R0182	Other	<p>Land ownership</p> <p>29. For obvious reasons, Mosaic Clubhouse would prefer Lambeth Borough Council to remain our landlord. As the council jointly provide around two thirds of our income, we have been able to ensure that rents are reasonable and increases reflected in our contractual income.</p> <p>30. If there is to be a JV for this land then this can be secured under the contractual arrangements. If no, then there will have to be policy provision to make sure that the use is restricted to mental health drop in centre uses first and only released for other uses should that use permanently cease and be no longer needed in this location. That will ensure that the rents are kept low. A s.106 obligation to the same effect should be required in policy.</p>	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.
Mosaic Clubhouse	R0182	Other	<p>Planning Policy Framework</p> <p>31. In the light of all the above, the planning policy framework must ensure that our use of a suitable space as part of the allocation is protected both in physical and financial terms.</p> <p>32. Under existing policy frameworks loss of community uses such as ours would be unacceptable absent equivalent reinstatement and we therefore propose that it be a requirement of policy that any proposals require:</p> <ul style="list-style-type: none"> a. permanent replacement of equivalent indoor space to the existing with the number and size of rooms as existing b. permanent replacement of private, secluded and not overlooked amenity space equivalent scale to the existing; c. dedicated car parking for at least 3 vehicles including 2 disabled bays. d. The new accommodation be provided before the existing premises are demolished so as to allow for continuity of user and occupation; e. the access arrangements to be designed to allow for a private and 	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.

Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>separate access to the premises and from it to the street;</p> <p>f. the premises windows and main facades to be orientated to maximise seclusion and privacy for members.</p> <p>g. There be a s.106 obligation ensuring the continued occupation of the new premises on appropriate terms as to rent by a mental health drop in day centre.</p>	
Mosaic Clubhouse	R0182	Other	<p>Definitions needed</p> <p>33. The policy as it is currently worded does not offer protection and some of it needs better, tighter definitions:</p> <ul style="list-style-type: none"> o "key existing community uses" - this needs greater definition and needs to name Mosaic Clubhouse as a key community use or at least expressly refer to drop in mental health day centre for this site. o "suitable rent"-there should be greater clarity on what this will mean and whether any future landlord will be able to increase the rent, when they can do this and by how much. Any rent must be compatible with our charity status and considerable benefit to Lambeth. o "phased development" -if there is to be phased development the plan must specify what will happen when, and in what order, and do so in detail. Temporary location (especially off site) is not acceptable and will undermine the services offered. Mosaic Clubhouse will not accept temporary accommodation during any development. 	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.
Mosaic Clubhouse	R0182	Other	<p>Conclusion</p> <p>34. We were very grateful for the opportunity to meet with you to discuss our concerns. In the light of the positive discussions at that meeting we look forward to our concerns being taken on board in more appropriately formulating planning policy for this proposed allocation. We would welcome being involved in discussions and will make a positive and pragmatic input into design proposals. We hope this objection is not necessary and that the issues we have raised can be rapidly addressed but you will understand that we cannot risk having policy adopted which would threaten our long term survival if this site is inappropriately developed. In short, any allocation must make clear that we are here to stay and the development must appropriately accommodate us.</p>	The Mosaic Clubhouse and Unitarian Church and Fitch Court have been removed from the proposed Site Allocation.
Transport For London Spatial Planning	R0312	Other	<p>We welcome confirmation that Local Plan and London Plan parking standards will apply. All existing car parking on the site should be removed consistent with London Plan Policy T6L which states that: 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy'. Due to the PTAL, this would require a car free development. Any redevelopment of the site</p>	Comments noted.

Officer Response to Reg 18 Representations: Site 21 – 51-57 Effra Road SW2

Respondent	ID	Draft SADPD Document	Comment	Officer response
			should minimise impacts on the bus lane and bus stands on Effra Road, including during construction.	

Officer Response to Reg 18 Representations: Site 22 – 1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24

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Respondent	ID	Draft SADPD Section	Comment	Officer response
Individual	R0032	Evidence	<p>Haven't had a chance to really ponder the document but after a first glance, I thought I should let you know that:</p> <p>2.20: Line 2: 'Wellfit Street / Herne Hill Road' should read 'Hardess Street / Herne Hill Road'.</p> <p>2.31: 'There are no trees on the site' - there is a tree in Wellfit Street. Something strange going on with your maps. The 1890s map shows a row of 6 houses along Hinton Road. The most southern and the most northern get destroyed (probably in the Second World War). The most southerly one does not get rebuilt. Wanless Road widens slightly and the frontage of the new row of houses and the small place of worship retreat accordingly, compared to the old frontage line.</p> <p>No. 11 Hinton Road is rebuilt in the sixties on the site of the most northern house that was on the corner of Hardess Street (now Wellfit Street).</p> <p>But on both these maps, you have included it or its empty site within the red line.</p> <p>[Figures 8 and 9 from Evidence document]</p> <p>The most recent map does not include it:</p> <p>[Figure 1 from Evidence document]</p> <p>[Sentence redacted]</p> <p>I'll be back in touch with comments before the deadline of 22 February.</p>	The policy wording has been amended to make reference to the broadleaf tree on site and, where relevant, the other matters raised here.
Individual	R0032	Vision Map	<p>Confusion over heights of buildings - in https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1641305150/projects/lambethsadpd/22_Hardess_Yard_COMPLETE.pdf the image shows the higher of the two blocks as further away from Hinton Road but in Vision Map, it is the other way round. The purple area is marked as 47m high and the blue area as 36m high. Which is correct? I've already written to you about the previous errors found - difficult to study all this with any belief in its veracity.</p>	Noted. The indicative approach has been revisited and the vision map amended accordingly.
Individual	R0032	Vision Map	<p>However, I still believe both potential towers are far too high to be right next to the 10/11m height of the residential buildings.</p>	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.
Individual	R0032	Vision Map	<p>On the Context Map - no idea what a Healthy Route is. What ever it is, it doesn't take you anywhere near the station or the main bus routes on Coldharbour Lane.</p>	As defined in Lambeth's Transport Strategy: "A healthy route has the right conditions to enable more people to walk and cycle. A healthy route links people with places they need to get to, such as schools, workplaces, amenities and shops. A healthy route is convenient, attractive, feels safe and is accessible to all. A healthy route could be a residential street or a

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				main road or a combination of both. And critically motor traffic levels are low, or on busier roads there is dedicated space that is not shared with general traffic." Further details can be found in Transport Strategy Implementation Plan Appendix A. For this site Healthy Routes run along Coldharbour Lane and Loughborough Road.
Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make.</p>	Noted.
Natural England	R0163	General	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	Noted.
Transport for London Spatial Planning	R0312	Other	<p>We welcome confirmation that Local Plan and London Plan parking standards will apply. Although the PTAL is 3, the site borders areas of PTAL 4 and 5, so a car free development would be supported.</p> <p>Contributions towards active travel connections, cycle hire provision and Loughborough Junction station may be appropriate. The site is adjacent to tracks used by London Overground services and so any proposed development will need to meet the standard requirements for the protection of, and continued access to, rail infrastructure.</p>	Noted. Policy wording amended to reflect suggested additions.
Herne Hill Society	R0328	Evidence	<p>We consider a building of the suggested height to be entirely inappropriate in this location. We reject the principle of the Higgs development providing a relevant precedent, for similar reasons as stated in our comments about site 23. As is stated in the "evidence" document the townscape that surrounds site 22 is formed predominantly of 2 to 3 storey buildings, including the houses on Hinton Road and Wanless Road which would be immediately adjacent to any development. The evidence document also acknowledges that this is not a "town centre" site and this fact negates arguments that substantial</p>	<p>The Council maintains its position that the Higgs development is relevant to the character of the area now that it is being built out. Additional views from the south have been included in the updated evidence for Reg 19.</p> <p>The Indicative Approach massing has been revisited in the Regulation 19 evidence document.</p>

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Respondent	ID	Draft SADPD Section	Comment	Officer response
			<p>height in this location would have "placemaking" benefit. Significantly, the evidence document entirely omits to consider in any detail the visual impact of development on views from the south, either from locations close to the site, or in longer views from that direction, for example from Hinton Road, Milkwood Road, Wanless Road or Herne Hill Road. None of the visualisations examine views from these streets. This means that the information offered at this consultation stage does not allow consultees to judge these impacts, which are likely to be significant.</p> <p>It is stated that "pushing the greatest height away from Hinton Road lessens the effect of the greatest height on the Loughborough Park Conservation Area and reduces impact in views along Hinton Road from the south". But this is a relatively small site, where pushing back a mass of the suggested height will only have a very negligible effect. Additionally we strongly reject the assertion that the proposed massing ensures a "neighbourly relationship" with adjoining properties; regardless of whether massing immediately adjacent to back gardens is reduced, the impact of a very tall building, the remainder of which would in reality be very close to those properties, remains. The "evidence" document says the development "should not be discordant or unduly dominant in its context". Yet this is precisely what the SADPD is proposing.</p> <p>The discussion of daylight and sunlight issues in the "evidence" document relies on this location being defined as an "inner urban/urban" location but we feel that there is no justification for this. To define this site as an "inner urban" one contradicts the description of the site context contained in the same document. A building of the suggested mass and height would have very significant impact on daylight to nearby properties.</p>	
Herne Hill Society	R0328	Evidence	<p>We welcome the intention to improve pedestrian access to the site, including to the adjacent railway arches. We also welcome in principle the intention to re-establish Hardess Street as a through route between Hinton and Herne Hill Roads. However, we do not think that an undercroft passing through a new development is an appropriate way to achieve this, and we believe that such an arrangement is indicative of an overdeveloped site, where an attempt to provide as much accommodation as possible is in conflict with any aim to create a satisfactory streetscape.</p> <p>In summary we consider the proposed approach for "site 22" to be unacceptable and furthermore supported by an "evidence" document with major omissions in its assessment of the potential impact.</p>	Noted.

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Respondent	ID	Draft SADPD Section	Comment	Officer response
Herne Hill Society	R0328	Site Allocation Policy	we agree with the statement that "The scheme should be designed to cause no unacceptable impacts on existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise pollution. Particular regard should be paid to the relationship with sensitive residential neighbours on Wanless Road." However, as more fully set out in our comment on the Evidence document, we do not regard this goal as capable of being achieved through a development of the sort envisaged under this Policy.	Noted.
Individual	R0367	Site Allocation Policy	The LJ Masterplan was never finished by the Council due to the argument over the Grove APG site. Were told that SADP were alternative. During process of drafting the SADPs the Council has been unwilling to talk to local residents. Nor did local residents get given choice of which sites they wanted for a SAPD. All local residents are getting is Statutory consultation. As this is a Coop Council local residents should have had consultation/ Co production before the draft was finished. also asked what sites they wanted for a SADP. Site 22/ Wellfit st/ Hinton rd/ Hardess st	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.
Individual	R0367	Site Allocation Policy	Has some of the same issues as the Sureways site. Its using the agreed heights of the Higgs development on the other side of the railway line to propose high development on this site. The streetscape surrounding this site is Victorian low rise terraced housing. Whilst replacing the workspace the height is about putting housing above. Why does it need this height? I think this will affect the nearby residential properties with overshadowing. It is overbearing on the nearby low rise Victorian housing. As with Site 23 its overdevelopment of this site. The play space on the roof of the podiums looks to me to be the minimum required. Not satisfactory for guide to future development.	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information. The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209 (2022))' and assessed against relevant policies of the London Plan (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards'), Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards') and other relevant guidance. Where relevant, this would include assessment of loss of radiation to solar panels in line with the BR209 (2022) guide. Podium play space is not uncommon, with careful child-focused design

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Respondent	ID	Draft SADPD Section	Comment	Officer response
				high quality provision can be provided in such locations. This is a detailed matter for applicants at design stage.
Individual	R0367	Site Allocation Policy	The mixed use development will also limit the kinds of uses to which the workspace can be used for.	The site is not located in a KIBA where more impactful uses should normally be located. It is acknowledged that not all light industrial uses may be appropriate within a mixed-use scheme. However, at planning application stage, the London Plan policy E7 would apply and it requires mitigation measures to be incorporated to ensure that residential use does not compromise the usability of light industrial space .
Mums for Lungs	R0501	Site Allocation Policy	<p>We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document.</p> <p>We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings.</p> <p>As acknowledged by Lambeth cabinet last November, “Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough.” Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document.</p> <p>Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.</p>	<p>One of the Strategic Objectives of the Lambeth Local Plan is ‘Tackling and adapting to climate change’. The Council is committed to ‘Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes’. These strategic overarching principles are also applicable to the SADPD PSV.</p> <p>The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy S11. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.</p> <p>The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth’s Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council’s work.</p>
Mums for Lungs	R0501	Transport	<p>Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough.</p> <p>We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?</p>	Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.
Mums for Lungs	R0501	Transport	In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.	In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking. Other London Plan policies will be applicable, such as Policy T1 ‘Strategic approach to transport’, T2 ‘Healthy streets’ and T5 ‘Cycling’, that set the

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			<p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It's equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p> <p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth council so that they become a tangible, positive reality for everyone living and working in the borough.</p>	<p>Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.</p>
Brixton Society	R0689	Other	<p>Land Uses/ Employment Space: It has been one of our long-standing concerns that the Council's preferred model of ground floor employment space with residential floors above fails to provide for operations which are noisier, messier, generate fumes or controlled waste, or run beyond normal working hours. Yet such operations may be meeting relatively local needs, such as car repairs or "dark kitchens". The reality is that potential business tenants have a wider range of needs, which are not always compatible with residential use directly above.</p> <p>Residential uses should have separate access to that for employment spaces, to minimise mutual disturbance.</p>	<p>The Site Allocation policy does not prescribe that the light industrial use is to be provided at ground floor only and does not preclude a scheme where light industrial floorspace would be stacked vertically on a part of the site. The site is not located in a KIBA where more impactful uses should normally be located. It is acknowledged that not all light industrial uses may be appropriate within a mixed-use scheme. However, at planning application stage, the London Plan policy E7 would apply and it requires mitigation measures to be incorporated to ensure that residential use does not compromise the usability of light industrial space.</p>
Brixton Society	R0689	Other	<p>Heritage Assets: The development will only have an adverse impact on the Loughborough Park Conservation Area if the proposed excessive building heights are allowed.</p> <p>Building Heights, Views, Townscape: The proposed building heights are grossly excessive, and the outcome in townscape terms will be a cluster of towers around Loughborough Junction, despite this not being identified as an area suitable for tall buildings. A single tower of no more than 30m (in effect 10 storeys) should be the maximum acceptable.</p> <p>We are alarmed that two tall buildings are being proposed close together, with the risk that they may be provided by different developers or in different phases. Daylight, overshadowing and mutual privacy will be critical. Lambeth planning policies still lack clarity over separation distances between facing windows in different dwellings.</p>	<p>The Higgs scheme is now on site and its visibility from the Loughborough Park CA is not considered harmful. The indicative approach massing has been revisited. Additional daylight / sunlight work has been undertaken to inform the next iteration of the Indicative Approach.</p>

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Brixton Society	R0689	Other	<p>Transport/ Public Realm: Once again an opportunity is being missed to provide platform access to the London Overground service, with potential interchange with the existing Thameslink service. The location map fails to identify either service, and instead labels all the rail lines as "Low Line" which is not explained.</p> <p>Reliance only on PTAL scores is misleading because it ignores the lack of capacity on London-bound Thameslink services in the morning peak.</p>	<p>Consultation with Network Rail and Transport for London will be required. Planning obligations may be sought to mitigate any impacts of development on transport infrastructure, such as Loughborough Junction station.</p>
Brixton Society	R0689	Other	<p>Energy & Environmental issues: It is unwise to propose 2 tall residential blocks overlooking 2 busy railway lines. New dwellings will require either triple glazing, or a combination of double-glazing with secondary glazing, to achieve adequate sound insulation.</p> <p>Site constraints mean that opportunities for additional public open space or biodiversity appear to be very restricted.</p>	<p>Any proposed development that comes forward would be required to demonstrate an acceptable response to noise generated by the railway lines at planning application stage in accordance with the requirements of the Building Regulations regime (such as the emerging Future Homes Standard).</p> <p>Public open space provision is addressed in Local Plan Policy EN1 and Paragraph 9.10. In areas of open space deficiency, on-site open space provision or accessibility improvements to borough and metropolitan SINC's will be sought. The policy wording has been updated to reflect that planning obligations may be sought to mitigate any impacts of development on local public realm, such as towards the delivery of the Healthy Route Network on Coldharbour Lane.</p>
Helen Hayes MP for Dulwich and West Norwood (Labour)	R0698	Other	<p>This site was recently the subject of a planning application for a 29 storey building. The neighbouring Higgs Triangle site is currently being developed with permission for a 20 storey building, and the nearby Hero of Switzerland site has also been granted permission for a tall building. Concerns have consistently been raised in this area about the lack of adequate public transport infrastructure to accommodate the needs of several hundred new homes. Loughborough Junction station is inaccessible and during non-pandemic times it is so crowded in the morning peak that it is often not possible to board a train. Bus services also frequently run at capacity, and Transport for London is currently indicating significant cuts to bus services across the capital. This renders the PTAL 4 rating meaningless in practical terms.</p> <p>The cumulative impact of the existing permissions and lack of any deliverable proposals for new public transport capacity must be a consideration in establishing the height and density of development on Site 22. Having looked in detail at this site over many years, my view is that further significant height cannot sustainably be accommodated in this location. The design principles for this site should reflect the dominant local grain and character of the area, and the limitations of the current public transport network.</p>	<p>Consultation with Network Rail and Transport for London will be required. Planning obligations may be sought to mitigate any impacts of development on transport infrastructure, such as Loughborough Junction station.</p>
GLA	R0852	Other	<p>As the site is located within Brixton CEZ LP2021 Policy E3 applies. The site allocation should refer to the requirements of Part A, specifically for affordable workspace for sectors that have cultural value such as</p>	<p>London Plan policy E3A makes clear that planning obligations may be used to secure affordable workspace in defined circumstances set out in parts B and C of the policy. Parts B and C refer to areas and policies identified in</p>

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			creative and artists' workspace, rehearsal and performance space and makerspace. The Mayor welcomes the intention to protect existing industrial capacity. As part of the site contains undesignated industrial uses, Policy E7C of the LP2021 applies and should be reflected in the proposed allocation.	Development Plan Documents. Lambeth's affordable workspace policy is set out at ED2 of the Lambeth Local Plan 2021. It applies to a net uplift in office floorspace in defined locations in the borough based on the viability evidence that was tested at examination. It does not apply to new light industrial floorspace because development values for that use were not found to be strong enough to justify an affordable workspace requirement. Local Plan policy ED2 would therefore not apply to the proposed approach set out in the draft site allocation for this site (a net uplift if office floorspace would not be supported), which is why it is not referenced. London Plan policy E7C relates to development proposals rather than the preparation of development plan documents. It acknowledges that sites in use as non-designated industrial land can be allocated for residential or mixed-use development, which is what is proposed in Lambeth's Draft SADPD for this site. The land use section has been updated to read 'light industrial workspace should be appropriate to the Brixton Creative Enterprise Zone (in accordance with London Plan Policy HC5C).
GLA	R0852	Other	Because the borough is in the CSA, there should be a greater focus on the need to provide essential services to the CAZ in accordance with paragraph 6.4.7 of the LP2021 and this should be incorporated into the allocation. These services include sustainable last mile distribution/logistics, 'just-in-time' servicing among others.	London Plan paragraph 6.4.7 is noted and was fully acknowledged throughout the preparation and examination of the Lambeth Local Plan 2021. The following wording will be added to the land use section of this allocation: "Given Lambeth's location in the Central Services Area, applicants should consider the potential to include space for industrial uses that can provide essential services to the CAZ in accordance with paragraph 6.4.7 of the London Plan 2021. These services could include sustainable last mile distribution/logistics or 'just-in-time' servicing, for example, and should include operational yard space where feasible. Applicants should demonstrate in their proposals how the potential for including these uses has been considered and explain the outcome of that consideration.
Environment Agency	R0886	Other	Current flood zone designation: 1 Rivers on / adjacent to site / flood defences: No Permitted waste site within 250 metres: No Groundwater Source Protection Zone: No Comments to add into site allocation text: [blank]	Noted
DP9 on behalf of Leos International	R1151	Other	These representations are submitted to the London Borough of Lambeth ('LBL') on behalf of our client Leos International Ltd, in respect of the Council's Regulation 18 Consultation Draft of the Site Allocations Development Plan Document ('Draft SADPD'). Our client wishes to make representations in respect of Site 22 (1 & 3–11 Wellfit Street, 7–9 Hinton Road & Units 1–4 Hardess Street SE24). Our client welcomes the allocation of the Site and the principle of	The Site Allocation policy does not prescribe that the light industrial use is to be provided at ground floor only and does not preclude a scheme where light industrial floorspace would be stacked vertically on a part of the site. The site is not located in a KIBA where more impactful uses should normally be located. It is acknowledged that not all light industrial uses may be appropriate within a mixed-use scheme. However, at planning application stage, the London Plan policy E7 would apply and it requires

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			<p>development which is established by the Draft SADPD. We wish to make comments on two aspects of the Site Allocation Policy table, in respect of land uses and building heights.</p> <p>Land uses</p> <p>The Draft SADPD states that the Site has the potential to accommodate at least 1,400 sqm of light industrial workspace. This appears to be the application of the 65 per cent plot ratio set out in the London Plan to the site area to give a figure of 1,400 sqm (as referenced in the most recent decision for the site, 19/04280/FUL).</p> <p>It should be stipulated that this is not necessarily a minimum requirement of industrial floorspace, rather the threshold for whether development would constitute a net loss of industrial floorspace, and therefore which affordable housing threshold would need to be met to quality for the Fast Track Route.</p>	mitigation measures to be incorporated to ensure that residential use does not compromise the usability of light industrial space .
DP9 on behalf of Leos International	R1151	Other	<p>It is also unclear how the indicative '70-90' self-contained unit quantum has been derived. It is considered that this should not necessarily be quantified, provided that all units achieve acceptable living standards internally and externally, and that the proposals are more widely considered acceptable in planning terms.</p> <p>Building Heights and Views: Townscape</p> <p>It is noted that a general building height of 47m is indicated in the Draft SADPD. Further elaboration of this should be provided on the basis that there is no rationale in the evidence base for why this is deemed an appropriate height for the site. Without a full assessment of a proposal's design quality and impact on heritage assets and balance of public benefits, we disagree that the approved development at Higgs Yard should be deemed in policy as reference for the maximum height.</p> <p>Conclusion</p> <p>We have welcomed the opportunity to make representations on the Regulation 18 Draft of the SADPD. If you require any clarification on any matters, or wish to discuss our representations further, please contact [redacted] of this office.</p>	The evidence provides the explanation of how the site capacity has been assessed. Considerations such as townscape, heritage and daylight / sunlight have been key considerations.
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites,</p>	Noted.

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			<p>subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but</p>

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			<p>standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.</p>	<p>also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> • Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking</p>	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			<p>producer of anthropogenic (man-made) CO2e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO2e output. - 4-5% of the worldwide total of CO2e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution • Steel Steel also has a significant impact on the environment: <ul style="list-style-type: none"> - It is CO2e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement: • Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit "off-gas" toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. • Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world's riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building 	

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			completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber.	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> • Overheating, caused by the proliferate use of glass and a high concentration of inhabitants • Increasing carbon energy required to offset this through mechanical ventilation • Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise ‘skyscraper’ buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p> <p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in</p>

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				particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council's commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <p>1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p> <p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p>	Noted. Please refer to officer responses to previous points made as part of this representation.

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			<p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	
Individual	R1347	Evidence	<p>To comply with council policy on the Climate Emergency, in particular reducing car ownership & thus use, the evidence to include a requirement for the residential & industrial sections of the development to be motor vehicle free apart from all ability EV car share, with no ability for occupiers to obtain CPZ permits. Dedicated space for short stay deliveries for servicing all the development both residential & other to be repurposed CPZ space from adjoining streets.</p> <p>Direct cycle & walking routes from Herne Hill Road to Hinton Road to be a requirement as PN10Aii &vi</p>	This walking and cycling route is shown on the Vision Plan. Servicing within the site, in line with Lambeth Local Plan Policy T7, would be required.
Individual	R1347	Vision	As we are in a Climate Emergency & driving is a major contribution Vision to include for a car free development as other is the area.	Noted.
Individual	R1347	Vision Map	Walking & cycling routes required between Herne Hill Road & Hinton Road to comply with PN10 A ii & vi	This walking and cycling route is shown on the Vision Plan.
Individual	R1349	Evidence	The evidence for site 22 completely omits to show any visualisations for the impact of a development on views from Milkwood Road, Hinton Road, Wanless Road or Herne Hill Road. The visual impact of a building as high as 36-47m will be very significant when viewed from the south. The omission of these important views means that the entire assessment is flawed.	The indicative approach has been revisited and the revised views assessment now includes more views from the South.
Individual	R1349	Site Allocation Policy	Strongly disagree that the site is appropriate for a building height of 47m. This is completely out of scale with the surrounding streets and the urban block it would be part of. The evidence document itself points	The construction of the nearly completed Higgs scheme has already changed the character in the immediate locality of the site and it is considered that complementary development of a similar height on this site

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			out that most buildings in the vicinity are just 2-3 stories high. The Higgs development is not appropriate as a precedent; it is on the other side of the railway tracks on a site which does not have low-rise residential buildings immediately adjacent. To describe a building of the height proposed as a "step-down" from this is misleading. The proposed policy wording states that "lower buildings elsewhere on the site" should respond to immediate context, eg back gardens on Wanless Road, but this principle should apply to the whole site, because it is not a large site, and the back gardens on Wanless Road are in the immediate context of the whole site.	will establish a small cluster of tall development around the railway viaducts and bridges, whilst clearly different from the low-rise residential hinterland to the south, the presence of taller development here is not considered unacceptable in principle in light of the assessments undertaken.
Individual	R1357	Vision	The scale of the development is too large. The only positive is that it might hide the Higgs development site. This kind of development including the consented Higgs development is not in keeping with the location or infrastructure in the area.	<p>The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.</p> <p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the evidence for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.</p>
Individual	R1357	Vision	This kind of development including the consented Higgs development is not in keeping with the location or infrastructure in the area. Loughborough junction station has poor accessibility yet no money is ever sought from developers to improve matters and the low traffic neighbourhood on Shakespeare Road has resulted in significant traffic	The policy wording has been updated to reflect that planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as towards the delivery of the Healthy Route Network on Coldharbour Lane, improvements to local cycling infrastructure and Loughborough Junction station.

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			increases in Milkwood Road with nothing done about it or the incessant speeding of drivers who act with impunity.	
Individual	R1357	Vision	I would support something no higher than 4 storeys. More green space is also needed.	Noted.
Individual	R1364	Vision	This site has a problematic history and the local community felt vindicated that Lambeth council refused permission for 2 tower blocks, one 29 storeys tall. The massing is designed to reduce the impact of any building on local heritage assets which is welcome, and the height seems restricted to less than the adjacent 16 storey tower in Higgs Yard.	Noted.
Individual	R1364	Vision	Welcome too is the fact that this is seem as a mixed used industrial/residential development, with a Maker Space indicated, as this mirrors the mix of uses in Loughborough Junction.	Noted.
Individual	R1364	Vision	<p>However, the massing indicates a very clumpy building and it will take an imaginative architect to get this to work in a way which will make a contribution to LJ as well as providing much needed social housing a well; I can see this site remaining derelict for many year.</p> <p>Overdevelopment of the site. The concern to produce a scheme which reduces the impact on heritage assets produces a building of unappealing mass with two towers (36 and 47 metres) approaching the height of the 16-storey tower (53 metres) on the Higgs site. As with the Sureways church site the height of the buildings bears no relation to the surrounding buildings which range from six to 11 metres. Again, the argument is made that a cluster of tall buildings in Loughborough Junction is acceptable.</p> <p>No indication of the status of new Hardess Street which wiggles through the site and under the mass of the building. Is this a new road, or is it only a pedestrian/cycle road which would be preferable?</p> <p>This is an area of open space deficiency. There are 2 roof terraces, but these will not be public green spaces and seem to be there to meet the play space requirement. No attempt made to rectify green space deficiency. A missed opportunity.</p> <p>Welcome industrial uses and possible inclusion of maker space.</p> <p>Welcome idea to punch through an arch to provide pedestrian route through to Higgs development</p>	<p>The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character or heritage assets. Please see the revised evidence document for further information.</p> <p>Public open space provision is addressed in Local Plan Policy EN1 and Paragraph 9.10. In areas of open space deficiency, on-site open space provision or accessibility improvements to borough and metropolitan SINC's will be sought. The policy wording has been updated to reflect that planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as towards the delivery of the Healthy Route Network on Coldharbour Lane, improvements to local cycling infrastructure and Loughborough Junction station.</p>
Individual	R1462	Evidence	You have not taken into consideration the local objections to the Higgs Yard development, which were many, and which were ignored in granting planning permission. The 16 storey development is out of character with the heights of the surrounding buildings - there are no buildings of this height in the vicinity. To add to this with a further high rise building further destroys the character of the local environment - which is mainly low rise housing.	The Higgs objections were considered by Lambeth's Planning Applications committee when it was determined. The Higgs scheme was considered acceptable and granted permission. It is now nearly completed and has already changed the character in the immediate locality of the site. It is considered that complementary development of a similar height on this site will establish a small cluster of tall development around the railway viaducts and bridges, whilst clearly different from the low-rise residential hinterland

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				<p>further to the south, the presence of taller development here is not considered unacceptable in principle in light of the assessments undertaken.</p> <p>The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.</p>
Individual	R1462	Evidence	There is also no consideration of the capacity of the local infrastructure to support further developments e.g. local transport routes, which are often blocked or over capacity; local schools, leisure, parks, retail and health facilities. The local infrastructure is already at capacity or over crowded. Developments of further housing or work environments must take these factors into consideration.	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the evidence for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal. The policy wording has been updated to reflect that planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as towards the delivery of the Healthy Route Network on Coldharbour Lane, improvements to local cycling infrastructure and Loughborough Junction station.</p>
Individual	R1545	Vision	Because of the proximity of the site to the Higgs Triangle development which will bring a large number of new properties and high dense housing without adding anything to our infrastructure but rather over crowding our station and doing nothing to combat our existing environmental issues, we need this site to be developed to include green space and facilities such as shops to support all the new housing, NOT another massive new development. As a workshop type area for creative industries, it needs to be appealing with green open space and a quality well designed building with light; in order to attract businesses	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the evidence for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p>

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			and practitioners. The area is neglected and run down already and needs investment in it's pavements and trees and a social space to create a healthy community. Please consider us and allow this area the same kind of investment s Brixton town centre is seeing, when planning	<p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development <p>Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal. Public open space provision specifically is addressed in Local Plan Policy EN1 and Paragraph 9.10. In areas of open space deficiency, on-site open space provision or accessibility improvements to borough and metropolitan SINC's will be sought.</p> <p>Any future planning application will be accompanied by a full Transport Assessment which would include a predicted trip generation for all transport modes including pedestrians, swept path analysis of vehicles and details of transport related matters.</p> <p>The policy wording has been updated to reflect that planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as towards the delivery of the Healthy Route Network on Coldharbour Lane, improvements to local cycling infrastructure and Loughborough Junction station.</p>
Individual	R1603	Vision	It's all rather vague	It is considered that the vision is sufficiently clear. It is noted that the site allocation sits within the context of Policy PN10 'Loughborough Junction' which sets the vision for the area.
Individual	R1608	Vision	agree with the vision for development of the space. Just not the height of the proposed development itself	Noted.
Individual	R1608	Vision Map	47m and 36m is far too tall for area when all other buildings are 11m maximum. The height needs to be seriously reconsidered	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.
Individual	R1612	Vision	<p>Vision, page 148</p> <p>The draft Site Allocation DPD should clearly set the desired townscape and placemaking outcomes for SA22, Wellfit Street and Hardess Yard. The vision description should include an aspiration of the kind of place Loughborough Junction should become and the role that SA22 should take. The context description should identify the key desirable and valuable characteristics of the area including the industrial heritage, railways, yards, and demographics.</p>	<p>The 'neighbour context' section describes the neighbouring uses, infrastructure and designations which informed the vision. The vision for site 22 should be read in the context of Local Plan Policy PN10 which sets out the vision for the wider area. With regards to displacement of businesses, the previously proposed pedestrian link through the arches occupied by the boxing gym has been removed. Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. As and when proposals</p>

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			The displacement of and harm to existing business and social infrastructure, such as the boxing club should be avoided. It would be helpful to identify and list any existing social infrastructure. With the regeneration of an area there is a risk of gentrification, which should be mitigated by retention policies, such as enabling long-time residents to stay and benefit from new jobs, services, and housing. A local needs-based approach to the affordable housing provision should be encouraged. Redevelopment should design for diversity and inclusion avoiding cultural and economic displacement.	emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected. With regards to affordable housing, the draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The standard London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to the support the examination of the London Plan and Local Plan. The mix of tenures will be fully considered at the time a planning application is brought forward on the site and Local Plan Policy H2 will apply. Planning policy needs to be based on the best available evidence, and the affordable housing requirements set out in Lambeth Local Plan policy H2 is based on evidence of local housing need in Lambeth.
Individual	R1612	Vision	Map, page 149 Key The annotations for the potential locations for tall buildings should include an indicative range of heights, such as 30m to 40m and 40m to 50m to avoid being prescriptive. The 'Potential pedestrian route through arch' (as shown) would require the displacement of the boxing club, which should be avoided. The indicative one-way servicing route is ill-conceived and would result in a disrupted ground plane. The use of traditional yards for servicing should be encouraged, which reinforces the industrial characteristics of the area.	With regards to displacement of businesses, the previously proposed pedestrian link through the arches occupied by the boxing gym has been removed. Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected.
Individual	R1612	Context Map	Context, Pages 142-143 Site Map / Area The site boundary is too tightly drawn. Consideration should be given to a larger site area including the adjacent railway arches and the west side of Wanless Road, Nos. 7 to 23 (odd) to ensure a comprehensive approach to redevelopment and placemaking. Land ownership The land ownership is across public and private interests, as the site area includes public highway and railway land.	The site boundary includes sites which are expected to come forward for development in a reasonable timeframe. The boundaries have been adjusted to reflect Land Registry details and include some relevant pavements. The inclusion of other sites (such as existing residential properties in different ownership) is not considered to be required and could impact on deliverability of wider proposals. Their inclusion would also be unlikely to result in significant changes to optimisation of the allocated site as the other sites are constrained by other neighbouring context. The land ownership section has been revised to reflect that parts of the site are in public ownership.
Individual	R1612	Site Allocation Policy	Site Allocation Policy, pages 150-152 Heritage assets Given the lack of proximity, redevelopment of the site is very unlikely to impact on the setting of the Loughborough Park Conservation Area. There is a potential to affect views out of the conservation area, which	Noted. When compared to the site allocation site, the Higgs site is more centrally located and closer to Loughborough Junction railway station. The site allocation site, being to the South of the viaducts, further from the centre and on the edge of the residential hinterland of low-rise residential homes. Given these considerations it is not considered that the site is of

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			<p>is distinct from its setting. The potential harm of any development on identified heritage assets should be assessed in line with the NPPF, July 2021 with particular regard to paragraphs 199 - 203.</p> <p>Building heights and views; townscape</p> <p>The designation of the site as an appropriate location for tall buildings is welcome; however, the acceptable building heights should not be unduly constrained by the development at Higgs Yard. The limited architectural and townscape merits of the Higgs Yard buildings should not become the architectural landmark for Loughborough Junction. Site SA22 has the potential to deliver both a forward-looking employment hub for the area and much needed housing. As such, it is arguable that the site location is of greater townscape significance, which should be expressed as a strong and recognisable landmark and gateway within Loughborough Junction.</p>	greater townscape significance that would warrant a development larger than that on the Higgs site.
Individual	R1612	Site Allocation Policy	<p>Transport, movement and public realm</p> <p>The development should enhance the existing movements of pedestrian and cyclists along Wanless, Hinton and Herne Hill roads. There is no evidence supporting a desire line of pedestrian movement through the site. Suggesting a vehicular through-route is problematic for a couple of reasons:</p> <ul style="list-style-type: none"> • It would potentially undermine the intentions of good placemaking; industrial delivery and service vehicles defining the townscape at ground level would undermine the quality of urban space. The policy should rather seek to foster the existing uses in the railway arches (boxing gym, artists' studios, etc) with more pedestrian and cycle friendly access rather than allowing delivery vehicles to permeate the site. • The access route is not all under the same ownership; vehicular access will require the acceptance of at least two owners. The use of traditional service yards should be encouraged. <p>Regarding the discouragement of the use shared surfaces, it would be preferable to say that the use of shared surface environments, where it can be demonstrated that safety and benefits are achievable for all road users, would be acceptable.</p>	The indicative approach has been revisited however it still includes a new vehicular through route. This is considered the best option for servicing and offers greatest potential in relation to the adjoining railway viaduct arches and their current poor access. The case for shared surface development is best made at application stage based upon a detailed proposal. Proposed route through the site would provide the most efficient means of servicing the site, minimising the amount of hard standing on the site and would provide a pedestrian link to the new buildings within the site.
Individual	R1612	Site Allocation Policy	<p>Community safety</p> <p>The design and location of residential entrances should be qualitative, rather than prescriptive. Greater clarity should be provided regarding the desirable qualities in addition to visibility, sightlines, and natural surveillance for residential entrances. For example, new routes could be proposed serving the residential entrances using a criteria-based approach.</p>	Designing for community safety is discussed in Local Plan Policy Q3. This policy is referred to in the draft SADPD, as well as Secured by Design. However, the design of the site in terms of community safety will be looked at in greater detail when a planning application is submitted.

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Individual	R1612	Site Allocation Policy	Although it may require its own subheading, some provision or mention of Fire Safety should be included within the Site Allocations Policies document, due to the designation of the site as an acceptable location for tall buildings (Gateway 1 relevant buildings).	Site allocations will sit alongside the rest of the development plan. In addition to site allocation policies, all other relevant Local Plan and London Plan policies will apply to any planning applications that come forward for these sites. Notwithstanding this, a new subheading has been added to draft policy wording for all sites. It is acknowledged that fire safety of developments needs to be considered from the outset. Any proposed major development that comes forward would be required to demonstrate through a planning application compliance with policy D12 'Fire Safety' of the London Plan as well as any relevant guidance when it is adopted (such as 'Fire Safety London Plan Guidance'). In addition, the Government's system of fire safety gateways requires fire safety information for relevant buildings to be submitted at planning application stage (Gateway 1) which is referred to and assessed by the Health and Safety Executive as part of the planning application process.
Individual	R1612	Evidence	Evidence Base 2. SITE APPRAISAL / ANALYSIS 2.1. Site Overview. The allocation site boundaries should expand to include 7-21 Wanless Road, the railway arches, and the extent of the pavement at Hinton Road, Wellfit Street, and Herne Hill Road.	The site boundary includes sites which are expected to come forward for development in a reasonable timeframe. The boundaries have been adjusted to reflect Land Registry details and include some relevant pavements. The inclusion of other sites (such as existing residential properties in different ownership) is not considered to be required and could impact on deliverability of wider proposals. Their inclusion would also be unlikely to result in significant changes to optimisation of the allocated site as the other sites are constrained by other neighbouring context.
Individual	R1612	Evidence	2.6 to 2.7. Site context. The viaducts should be read as gateways rather than as barriers. Whereas the character of the two/three storey Edwardian terrace housing townscape resembles that of many other similar parts of London, it is the many tall viaducts and railway arches cutting through the area that define the uniqueness and attraction of Loughborough Junction. 2.9. Local character. The nature, character, and townscape value of the central urban superblock, enclosed by Hinton Road, Wanless Road, Herne Hill Road and Coldharbour Lane, has been underestimated and misjudged. This substantial centre superblock has been primarily defined by industrial buildings and sheds, whether constructed of steel with metal sheet cladding or brick. In conjunction with the viaduct and bridge structures, it provides the strongest characteristic townscape element for Loughborough Junction, setting it apart within London. 2.11. Building Heights. Please clarify if the 70m height is measured AOD or otherwise. 2.17. Designated Views: Strategic Views. Please clarify whether the site falls within or without the WSCA of LP panorama View 2. If so, the guidance does not imply that this places an undue constraint on	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.

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			<p>building height. Rather, the guidance is that development in the backdrop should be carefully designed and not dominate the Victoria Tower or Central Lobby Lantern.</p> <p>2.23. Site Constraints and Opportunities: Neighbour Amenity. Including Nos. 7-23 Wanless Road within SA22 would allow an opportunity for redevelopment in the medium to long-term, which would mitigate / resolve concerns around unacceptable amenity impacts and relationships at Hinton and Wanless roads.</p> <p>3.1. Design Approach</p> <p>A. Respect Heritage Assets. The approach is poorly articulated as the settings of the identified assets (given the lack of proximity) are very unlikely to be affected by redevelopment at SA22. Incremental changes that may affect views in and out of the LPCA are to be expected. Guidance on the relative heritage value of the assets and individual contribution to the wider townscape and character of Loughborough Junction should be provided.</p> <p>B. Placemaking. More guidance should be provided based on desired outcomes for the wider context. As drafted, there is an undue emphasis and focus on the development at Higgs Yard to the exclusion and detriment of the wider townscape. What kind of place is envisaged? What is the placemaking role of SA22? Should it function as a gateway or marker? How should the emerging group of tall buildings read compositionally within the townscape and in local views? What level of visual interest is required, and does it vary in importance at the higher levels from the street level? This element of the draft guidance requires more rigour.</p>	
Individual	R1612	Evidence	<p>D. Transport. The guidance is focused solely on vehicular access and servicing. Taking such an approach would potentially turn the entire ground plane into a "delivery and servicing zone" and erode any urban character it may have benefited from. Both new and existing uses (eg railway arches artists' studios, boxing gym, etc) need an approach based on the pedestrian and cyclist experience in order to be attractive, useful, and safe. The draft evidence as written is woefully inadequate.</p> <p>4.2. Indicative Approach - Layout and Access. As noted in point D. Transport. above, such an approach could result in not only the loss of the traditional yard but assigns priority to vehicular movements throughout the entirety of the site giving rise to conflicts with pedestrian and cycle movements.</p>	Servicing and delivery proposals would be required in line with Lambeth and London Plan standards. This includes providing this on site and ensuring it does not impact on highways safety for other road users or pedestrians in line with Lambeth Local Plan Policy T7.
Individual	R1612	Evidence	<p>4.3. Railway arches nos. 261 & 262 house Miguel's Boxing Gym, a well-known, valued, and well-established boxing gym in the area. Dislocating this long-time local business and important part of social infrastructure will harm the area in general and the site in particular. Disruptions to</p>	The indicative pedestrian link has been removed. Locating an indicative pedestrian link in other arches has been considered but discounted.

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			such an important operation should be avoided. It is unclear how the benefits of an ill-defined pedestrian link to the service road of the Higgs site outweighs those of maintaining and enhancing the boxing gym that supports and develops young people. A better, perhaps more feasible opportunity is to consider the disused arches further along the viaduct.	
Individual	R1612	Evidence	<p>4.4. The indicative approach reverses the placement of the tall building elements from that advised in the draft Site Allocation Policy document and places the greater height at the most sensitive part of the site. Further, it is arguable that the utilitarian expression of the Higgs development needs to be counterweighed by offering Loughborough Junction a more representative landmark. By creating a public-friendly, permeable urban zone, consisting of commercial activities rooted in the character of LJ (maker spaces, ambitions of the CEZ, etc) and housing, the SA22 offers a much better opportunity and role in shaping the townscape, rather than to mediate heights and/or acquiesce to Higgs.</p> <p>4.5. In pushing the height away from Hinton Road, the indicative approach may:</p> <ul style="list-style-type: none"> • potentially exacerbating day-light problems to existing neighbours, when compared to scheme with tallest element near Hinton Road • deliver architecture that is "reduced in its impact" rather than take the opportunity to create an end-of-axis marker • exclude an urban configuration which would create a gateway configuration with Higgs 	The indicative approach has been revisited.
Individual	R1612	Evidence	<p>4.6. Uses. Regarding the c6m floor to ceiling height: -</p> <ul style="list-style-type: none"> • 2x 6m throughout the podium seems excessive • see previous comments re undesirable impacts of vehicular through-road 	The indicative approach has been revisited.
Individual	R1612	Evidence	5.4. TVIA Summary: Views. As noted above, no strategic panorama views are identified nor assessed. A consistent approach on the key local views to be assessed, and these should be identified and set out in the SPD guidance.	The indicative approach has been revisited and the views updated. This has included strategic and local views.
Individual	R1612	Evidence	6.1. Conclusion: Access. The indicative scheme achieves the opposite to the desired outcome. The resulting character of the public realm is a harsh, transient, service-route environment dominated by vehicular movements, unfriendly to pedestrian and cyclists. See previous comments above.	The indicative approach has been revisited.
Individual	R1612	Evidence	<p>Section 2 - Conflicts, clarification, and inconsistencies</p> <p>The following identifies points requiring clarification and highlights some inconsistencies and conflicting guidance between the draft site allocation policy, the evidence base, and site context.</p> <p>Site map, page 142</p>	Agreed. Vision map to be amended.

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			<ul style="list-style-type: none"> The site boundary at Hinton Road should include Wellfit Street highway and footway extents. [Site map, page 142] 	
Individual	R1612	Evidence	<ul style="list-style-type: none"> The indicative model used in the evidence base has the relative heights of the tall buildings reversed with the great height placed closest to the more sensitive receptors in Wanless Road. Context, page 143 	The indicative approach has been revisited.
Individual	R1612	Evidence	<ul style="list-style-type: none"> Heritage assets - As there are no assets on nor adjoining the site, it is not possible for the redevelopment of the site to affect the settings of the CA, registered park, or the locally listed buildings. There would be potential townscapes impacts arising, which would include impacts in some local views. 	The indicative approach has been revisited and the impact assessments revisited accordingly. The policy wording has been updated to reference proximity to the background consultation areas for the following strategic views: Panorama 2A: Parliament Hill.
Individual	R1612	Context	<ul style="list-style-type: none"> Views - The evidence base (para 2.17) states that the site falls within the Wider Background Consultation Area (WBCA) of London Plan panorama View 2 from Parliament Hill to Palace of Westminster whilst no strategic views are identified in the site policy. The statement made in the evidence base (para. 2.18) on the constraints on building heights is not consistent with London View Management Framework (2011) guidance. 	The indicative approach has been revisited and the impact assessments revisited accordingly. The policy wording has been updated to reference proximity to the background consultation areas for the following strategic views: Panorama 2A: Parliament Hill summit to Palace of Westminster, London Panorama 2B: Parliament Hill East of Summit to Palace of Westminster, and London Panorama 4 Primrose Hill to Palace of Westminster.
Individual	R1612	Context	<p>Context, page 144</p> <ul style="list-style-type: none"> 'Neighbour context' should be clarified to state that there are both occupied and derelict railways arches. Site Allocation Policy, page 150 Land uses: Please clarify if some 'town centre' uses ancillary to the main industrial use are acceptable. Affordable housing: Please clarify the position on viability appraisals including when required or not. 	The neighbour context is considered to be accurate. While some arches are in a poor state of repair, a site visit in December 2022 showed that the vast majority if not all appear to be occupied. With regards to town centre uses, the site is not located in a town centre and therefore main town centre uses would not be appropriate in this location. Policy ED7 of the Lambeth Local Plan would apply to proposals involving town centre uses. With regards to affordable housing, the draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The standard London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to support the examination of the London Plan and Local Plan. The affordable housing threshold for this site is set out in the site allocation policy. However, if the applicant cannot meet this threshold or fails to meet the other relevant criteria, the scheme will be viability tested to ensure that an applicant provides the maximum possible amount of affordable housing. The potential of this site to provide affordable housing will therefore be tested at the time of a planning application being considered.
Individual	R1612	Context	<p>[Context, page 144] • Heritage assets: Please clarify this guidance with respect to the NPPF guidance on assessing potential impacts to identified heritage assets. Please clarify how the redevelopment of the site would potentially impact the setting of LPCA and other heritage assets.</p>	The vision sets harmony with Higgs scheme as a key objective. Potential heritage impacts have been explored in the evidence document where a model of the indicative approach has been tested in a digital twin 3D model of London.

Officer Response to Reg 18 Representations: Site 22 – 1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24

Respondent	ID	Draft SADPD Section	Comment	Officer response
			<ul style="list-style-type: none"> • Townscape: Please clarify the desired relationship of the wider and emerging group of tall buildings and their roles in the townscape and placemaking. 	
Individual	R1612	Context	<p>Errors, Corrections and Omissions</p> <p>Site map, page 142</p> <p>The “Hardess Yard” map pin is erroneously located in the back gardens of Nos. 9 to 21 (odd) Wanless Road.</p> <p>Context, page 143</p> <ul style="list-style-type: none"> • The ‘Site area’ is understated. The area within the redline is 0.35ha. • As noted above, the land ownership is both private and public. <p>Context, page 144</p> <ul style="list-style-type: none"> • ‘Access to open space and nature conservation’ erroneously states that “Wyck Gardens is about 200m from the site to the north-east...”. The correct direction is northwest. • ‘Description of current site character’ contains several errors. The following corrected draft is suggested: The site is predominately in industrial use and is split into two parts. The western part is accessed via Wellfit Street / Hinton Road and formerly comprised includes a scrap metal yard, a skip yard and a retail unit. The eastern part of the site is accessed via Hardess Street / Herne Hill Road and contains four small light industrial units, two of which are currently vacant. The buildings are low-medium rise and of no architectural merit. <p>Context, page 146</p> <ul style="list-style-type: none"> • ‘Relevant planning history’, Your Ref 19/04280/FUL should agree with the published description of development, but it does not. <p>Site Allocation Policy, page 155</p> <ul style="list-style-type: none"> • Transport, movement and public realm: Where possible the access arrangements to arches 257–261 262. 	<p>The revised site area has been recalculated and figure adjusted. The land ownership has been also corrected. The description of 'access to open space', 'current site character' and the proposal in relevant planning history have been updated. The location of Hardess Yard has been corrected in the revised draft.</p>
Individual	R1615	Vision	<p>This was rejected before on the grounds it was too high and it is still too high and not in keeping with other buildings in the area max height should be 5 stories.</p>	<p>The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information</p>
Individual	R1617	Vision	<p>What will the light industry be? How much new housing? It has to be Council housing. There is no point at all building affordable or unaffordable housing, enough of that exists already.</p>	<p>The vision for site 22 encourages maker space' uses for small and growing businesses but light industrial uses could include other uses including some E and B class uses as well as some Sui Generis uses. The site is allocated for 50-70 residential units. With regards to affordable housing, the draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The standard London Plan and Lambeth Local Plan policies will apply.</p> <p>The mix of tenures (i.e. low-cost rent or intermediate products) will be fully considered at the time a planning application is brought forward on the site</p>

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				and Local Plan Policy H2 will apply. Planning policy needs to be based on the best available evidence, and the affordable housing requirements set out in Lambeth Local Plan policy H2 is based on evidence of local housing need in Lambeth.
Individual	R1700	Vision Map	<p>Upon inspection of the proposed approach for site 22 in Loughborough Junction, we have noticed there is a potential pedestrian route through arch from Hinton road to permitted Higgs Yard.</p> <p>This pedestrian through route will go through our business which has been in place for 30+ years. This will not only disrupt but demolish a successful business that provides a valuable service for the the local community. Here at Miguel's we provide initiatives to many that heavily rely on our services. We specialize in;</p> <p>Autistic Junior Boxing Beat Obesity Wellbeing Mental Health Boxing Deaf Friendly Boxing Free Boxing for underprivileged children Youth Boxing schemes to help combat knife crime White collar boxing Amateur Boxing Professional Boxing And many more</p> <p>All our clients that attend these services stated above will be incredibly impacted and saddened if business was to be affected by being replaced with a pedestrian route through arch. We would appreciate if this potential change could be reviewed. If it helps there are a few empty arches a few arches away that have been vacant for most of the years we have been here.</p>	The indicative pedestrian link has been removed.
Individual	R1732	Vision	The proposal would repeat all the mistakes of the "twin towers" save the extreme height. The Council should wait to see the social and visual impact of the Higgs buildings when finished, before deciding what might work around them. If a decision is needed now, height should be restricted to less than the lower Higgs buildings, allowing for the slope of the hill.	Noted. The vision sets harmony with Higgs scheme as a key objective.
Individual	R1732	Evidence	As stated in the Evidence (2.10), the area south of the railway is 2-3 storeys residential. At 3.1, key principle B says the proposal would "mediate" between this and the 16 storey Higgs building now under construction. No such mediation is needed; it will simply turn a narrow tall mass on one side of the viaduct into a much broader tall mass on both. As 4.5 shows starkly, the proposal would dwarf the lower Higgs buildings and would be only 6m shorter than the tallest, and less in reality because further up the hill.	The indicative approach has been revisited and the impact assessments re-run.

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			Key principle A1 is to respect Ruskin Park. Evidence 5.4 says there would be "negligible impact" and 5.5 says there would be no harm; neither is credible. The Evidence has not assessed the visual impact from the top of the Park along Ferndene Rd; this must be checked. View 8 asserts that from the bandstand this and the Higgs building would present a "coherent group" with "negligible impact" and 5.5 asserts they would be "neither discordant nor distracting" and would do "no harm". This is not the case; they will present a growing cluster of intrusive high-rise. As Vauxhall shows, once this starts it will not stop.	
Individual	R1760	Vision	Existing businesses should be given priority with rent protection. It needs to stay affordable (otherwise you will end up with long term untenanted units like the redeveloped units around Herne Hill station),	Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will encourage applicants to work as far as possible with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected. If compensation to businesses is considered necessary, this would be a matter between a tenant and their landlord, in accordance with the terms of any lease.
Individual	R1760	Vision	When people start getting back on trains Loughborough Junction will once again be unable to cope with the existing local population never mind additional people coming to the new space.	Consultation with Network Rail and Transport for London will be required. Planning obligations may be sought to mitigate any impacts of development on transport infrastructure, such as Loughborough Junction station.
Individual	R1856	Vision	Having looked at this consultation and reflected on the level of understanding required to have basic input. The council should be seeking ways to engage residents on a grass-root level. Delivering workshops for residents to gain awareness of how planning works would be a great starting point for greater engagement.	Consultation was undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. A full report of the Regulation 18 consultation will be published alongside the next iteration of the Draft SADPD, the Proposed Submission Version.

**Officer Response to Reg 18 Representations: Site 23 – Land at corner of Coldharbour Lane and Herne Hill Road
SE24**

Officer Response to Reg 18 Representations: Site 23 – Land at corner of Coldharbour Lane and Herne Hill Road SE24

Respondent	ID	Draft SADPD Document	Comment	Officer response
Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make.</p>	Noted.
Natural England	R0163	General	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	Noted.
Transport for London Spatial Planning	R0312	Other	<p>We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development. Contributions towards active travel connections, cycle hire provision and Loughborough Junction station may be appropriate. The site is adjacent to tracks used by National Rail services and so any proposed development will need to meet the standard requirements for the protection of, and continued access to, rail infrastructure.</p>	Noted. The policy wording has been amended to reflect the suggested additions.
Herne Hill Society	R0328	Other	<p>Regardless of the definition of a "tall building" that Lambeth chooses to adopt, we consider that a height of 30m, let alone 40m as the "evidence" document (para 4.5) suggests, would be excessive in this location. We do not accept the heights in the Higgs development as a relevant precedent, because they already depart substantially from the prevailing building height in the area. Additionally, although it can be argued that the Higgs site is largely bounded by railway viaducts and to some extent separated from the general grain of existing streets, this is certainly not true of "site 23" which fronts directly onto Coldharbour Lane and at a point where it is already narrow and constrained. The height of buildings along Coldharbour Lane, in both directions and for some distance is well established as predominantly 2 or 3 storeys with</p>	<p>The Higgs objections were considered by Lambeth's Planning Applications committee when it was determined. The Higgs scheme was considered acceptable and granted permission. It is now nearly completed and has already changed the character in the immediate locality of the site. It is considered that complementary development of a similar height on this site will establish a small cluster of tall development around the railway viaducts and bridges, whilst clearly different from the low-rise residential hinterland further to the south, the presence of taller development here is not considered unacceptable in principle in light of the assessments undertaken.</p> <p>The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an</p>

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			occasional 4 storey buildings. This is the precedent we consider to be relevant to this site. The rudimentary visualisations in the "evidence" document for this site do not in any way support the claims made alongside them, for example that a building of the suggested height is "beneficial to townmaking", provides a "welcome sense of enclosure", or "sits comfortably within the townscape". We believe that very few people, especially those familiar with the area, would agree with these statements. We welcome the recommendation to widen the footway around the perimeter of the site, and we also welcome the principle of creating a new route along the side of the viaduct. However, the bulk and height of the building envisaged for the site is wholly at odds with the creation of much needed improvement to the public realm at this important focal point in Loughborough Junction.	adverse effect on local character. Please see the revised evidence document for further information.
Individual	R0367	Site Allocation Policy	The adjacent Higgs site was criticised as over development of that site. This draft SAPD continues this to adjacent site. So this SAPD is overdevelopment of the site. The height is a major issue. Whilst the draft says it will be set back to have wider pavement the site is right next to Coldharbour lane. This section of Loughborough Junction is low rise Victorian. The justification is that this will be a landmark building to announce the railway station and centre of Loughborough Junction. So it's in planning jargon good placemaking. The height allowed is going to dominate that part of Loughborough Junction. It is out of keeping with the surrounding streetscape. The Council did say when they first mooted SADPs for Loughborough Junction that they would help appropriate development for Loughborough Junction. All this draft SADP does is continue with the Higgs development. The SADP proposes a mixed use developement. Retail on bottom is fine. This part of Coldharbour lane could do with more active frontage to work. However the draft SADP is trying to cram to much on site with uses that don't go together. Putting church on first and second floors with flats above isn't going to work. A church is better located on its own site. Noise etc is going to be a problem.	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information. With regards to the relationship between the mix of uses on the site, a high-quality design to ensure compatibility of uses on site would be required under other policies such as London Plan policy E7 and Local Plan policy Q2. Active frontages are encouraged in local centres, as per Local Plan Policy ED11.
Mums for Lungs	R0501	Site Allocation Policy	We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document.	One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy

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			<p>We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings.</p> <p>As acknowledged by Lambeth cabinet last November, “Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough.” Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document.</p> <p>Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.</p>	<p>generation in buildings and area regeneration schemes’. These strategic overarching principles are also applicable to the SADPD PSV.</p> <p>The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London Plan Policy SI1. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.</p> <p>The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth’s Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council’s work.</p>
Mums for Lungs	R0501	Transport	<p>Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough.</p> <p>We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?</p>	<p>Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.</p>
Mums for Lungs	R0501	Transport	<p>In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.</p> <p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It’s equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p> <p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth</p>	<p>In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking.</p> <p>Other London Plan policies will be applicable, such as Policy T1 ‘Strategic approach to transport’, T2 ‘Healthy streets’ and T5 ‘Cycling’, that set the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.</p>

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Respondent	ID	Draft SADPD Document	Comment	Officer response
			council so that they become a tangible, positive reality for everyone living and working in the borough.	
Brixton Society	R0689	Other	Land Uses/ Employment Space: The present use as a place of worship is only a resumption of the use prior to the Second World War, and we would prefer it to continue. There are several precedents around Brixton for residential development above or alongside, to enable remodelling or renewal of church premises. Our comments on site 22 about employment space also apply here, with the more limited space here requiring greater care in design to achieve compatibility with the residential element above.	The vision and site allocation policy acknowledges that there is potential to provide improved accommodation for the existing place of worship or alternative town centre uses. With regards to the relationship between residential and light industrial uses, a high quality design to ensure compatibility of uses on site would be required under other policies such as London Plan policy E7 and Local Plan policy Q2. Regarding employment space, the Site Allocation policy does not prescribe that the light industrial use is to be provided at ground floor only and does not preclude a scheme where light industrial floorspace would be stacked vertically on a part of the site. The site is not located in a KIBA where more impactful uses should normally be located. It is acknowledged that not all light industrial uses may be appropriate within a mixed-use scheme. However, at planning application stage, the London Plan policy E7 would apply and it requires mitigation measures to be incorporated to ensure that residential use does not compromise the usability of light industrial space.
Brixton Society	R0689	Other	Building Heights, Views, Townscape: The proposed height is grossly excessive in the street context. The height on the street frontages should not exceed 14m above pavement level (based on 3 residential upper floors above a more generous ground floor).	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.
Brixton Society	R0689	Other	Transport/ Public Realm: Some parking will be required in connection with the church use, including provision for weddings.	Local Plan and London Plan standards for car parking would apply.
Brixton Society	R0689	Other	The ground floor frontages should be set back to widen the public footway, but it would be acceptable for upper floors to remain on the existing building lines. An active ground floor frontage would be welcome on Coldharbour Lane.	Agreed regarding the building line. The draft policy wording has been amended to make this more explicit.
Helen Hayes MP for Dulwich and West Norwood (Labour)	R0698	Other	This site is proposed for redevelopment for light industrial/employment uses. This is consistent with its current use. My concern about the proposal as currently drafted is that it makes no mention of the current uses on the site which include a church. Any redevelopment proposals must secure the re-provision of current uses on the site.	The vision and site allocation policy acknowledges that there is potential to provide improved accommodation for the existing place of worship or alternative town centre uses. The wording of the policy allows some flexibility which is thought to incentivise the site coming forward.
Avison Young on behalf of National Grid	R0812	Other	Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Details of the sites affecting National Grid assets are provided below. Electricity Transmission Development Plan Document Site Reference: SA23 - Land at corner of	Changes are proposed to the wording of the context section and site allocation policy to acknowledge the existence of the National Grid asset on site and require a strategy responding to the National Grid electricity assets.

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Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>Coldharbour Lane and Herne Hill Road SE24</p> <p>Asset Description: 0Kv Underground Cable route: LPT2 Planned</p> <p>A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.</p> <p>Without appropriate acknowledgement of the National Grid assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of National Grid infrastructure.</p> <p>We propose that the following site allocations and/or associated policies include wording to the following effect:</p> <p>Allocation SA23 Land at corner of Coldharbour Lane and Herne Hill Road SE24</p> <p>"A strategy for responding to the National Grid electricity assets present within the site is required which demonstrates the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the asset has been reduced through good design."</p>	
Environment Agency	R0886	Other	<p>Current flood zone designation: 1</p> <p>Rivers on / adjacent to site / flood defences: No</p> <p>Permitted waste site within 250 metres: Waste management Licences x2 (EPR Lic no: EA/EPR/UP3190EV/A001) (EPR Lic no: EA/EPR/PP3195VN/V002)</p> <p>Groundwater Source Protection Zone: No</p> <p>Comments to add into site allocation text: [Blank]</p>	Noted. The draft policy wording has been amended to include reference to Local Plan Policy EN4(f) and requires the protection of groundwater from contamination sources.
Lambeth Green Councillors	R1321	General	<p>1. Introduction</p> <p>The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.</p> <p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the</p>	Noted.

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			<p>consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards.</p> <p>Offsetting is an unrealistically cheap 'get-out-of-jail-free' card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn't put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon emissions will make up a declining proportion of a development's whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development's unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment</p>

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Respondent	ID	Draft SADPD Document	Comment	Officer response
			<p>While the 2025 government requirement for the minimum standard to be at least 'zero carbon ready' has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of 'zero carbon ready' is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.</p>	<p>would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth's developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p> <p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> • Cement <p>Cement is a very high CO₂e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO₂e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO₂e output. - 4-5% of the worldwide total of CO₂e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use 	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and S17 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			<ul style="list-style-type: none"> - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the “urban heat island effect”, by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution • Steel Steel also has a significant impact on the environment: - It is CO2e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement: • Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit “off-gas” toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. • Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world’s riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber. 	

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Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> • Overheating, caused by the proliferate use of glass and a high concentration of inhabitants • Increasing carbon energy required to offset this through mechanical ventilation • Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise ‘skyscraper’ buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p> <p>The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p>
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council’s commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass</p>	<p>Noted. Please refer to officer responses to previous points made as part of this representation.</p>

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			<p>timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <ol style="list-style-type: none"> 1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills. 2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy. 3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board. 4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable. 5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon. 	

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			<p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	
Individual	R1347	Vision	Wider footway is welcomed but with flow cycle tracks on Hinton Road also required in line with requirements to address the Climate Emergency.	Noted. Please note the Site Allocation boundary does not include any section of the mentioned Hinton Road.
Individual	R1347	Site Allocation Policy	Development to be car free in line with Council policies to tackle the climate emergency. Deliveries to be located in dedicated repurposed CPZ space in adjoining streets	Proposals would be required to provide sufficient delivery and servicing arrangements in line with Lambeth Local Plan T7. This should avoid reliance on the public highway.
Individual	R1349	Evidence	Disagree with statements that assert a building of the height proposed will contribute positively to the area or townscape. These statements are simply asserted as fact with no justification. The height proposed is completely out of scale with other buildings in the town centre and along Coldharbour Lane. The height of the Higgs development is not an appropriate precedent. Coldharbour Lane at this point is particularly narrow and a building of more than 3 or 4 storeys in height will be overbearing. The principles of widening the pavement, and providing access alongside the railway viaduct are welcome however.	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.
Individual	R1357	Vision	The comment about accessibility is user dependent and doesn't take into account the lack of step free access at Loughborough Junction station. The steps are very steep. Development should be an opportunity to improve the station.	Planning obligations may be sought to mitigate any impacts of development on transport infrastructure, such as for Loughborough Junction station.
Individual	R1362	Vision Map	Tall building should be provided to provide focus	Noted.
Individual	R1364	Vision	<p>The proposal to animate the frontage so it makes a contribution to LJ town centre is welcome as is the proposal to pull back the building line to provide more pavement space. However, a 10 storey building on this prominent site seems excessive. The idea of re-providing Sureways church inside any new building might be an incentive for the church to get on with removing the existing eyesore. Such a pity the old Congregational Church building was never rebuilt after it was damaged in World War 2.</p> <p>- Welcome pulling back the building line, but unclear if this on ground floor only with an overhang acceptable.</p>	<p>The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.</p> <p>Agreed regarding the building line. The draft policy wording has been amended to make this more explicit.</p>

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Individual	R1364	Vision	Welcome animation of Coldharbour Lane and Herne Hill Road but unclear what usages acceptable. Could this be retail or is it workshop use. Is this part of the town centre or not?	The northern part of the site is located within a designated local centre as shown on the context map. The site has potential to accommodate town centre uses with active frontages within class E (such as retail, financial services, food and drink related uses) in that part of the site. Replacement community uses would also be acceptable. The site allocation policy envisages that light industrial uses could be provided along Junction Yard adjacent to the railway arches as indicated on the Vision map.
Individual	R1364	Vision	<ul style="list-style-type: none"> - Welcome route through to Higgs development along railway arches from Coldharbour Lane. - Question how compatible two floors of church use with residential above. - Totally oppose the height of the proposed building. A ten storey tower (ie 30 metres) is taller than the surrounding town centre buildings of 3, 11 and 13 metres. Fail to understand why this development needs to take its reference from the height of the Higgs development and why a cluster of towers in Loughborough Junction as seen from Ruskin Park is seen as acceptable in town scape terms and is seen to announce the town centre. 	<p>The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.</p> <p>With regards to the relationship between the mix of uses on the site, a high-quality design to ensure compatibility of uses on site would be required under other policies such as London Plan policy E7 and Local Plan policy Q2.</p>
Individual	R1462	Evidence	There were significant objections to the Higgs Yard development, which puts a 16 storey building in an area of low level housing. This proposal adds another 10 storey tower. It is out of keeping with the area as a whole,	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.
Individual	R1462	Evidence	and will put additional pressure on the local infrastructure which is already at capacity or over capacity e.g. travel from loughborough junction station.	Planning obligations may be sought to mitigate any impacts of development on transport infrastructure, such as Loughborough Junction station.
Individual	R1462	Evidence	No consideration has been made of the impact of these developments on the local supporting infrastructure that is required for people to live their lives effectively e.g. schools, transport, health services etc	<p>The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an Infrastructure Delivery Plan, which underwent examination as part of the evidence for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure.</p> <p>In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development

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				Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.
Individual	R1545	Evidence	A massive eyesore which will create a claustrophobic over crowded feeling to our residential area. Is this for real - these hideous colours and massive scale dwarfing Coldharbour Lane in place of 3-4 storey buildings? This is a massive overdevelopment of the site - specifically the large tower that is proposed.	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.
Individual	R1545	Evidence	"Announcing the station", a phrase used often in this planning doc - is referring to a single line/single platform station which will not be able to support the volume of new residents in addition to those from the Higgs Triangle development. The trains are already packed and the platform is narrow, the stairs are steep.	Planning obligations may be sought to mitigate any impacts of development on transport infrastructure, such as Loughborough Junction station.
Individual	R1545	Evidence	The development is entirely too massive for the space and too tall - it will create a claustrophobia on Coldharbour Lan	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. Please see the revised evidence document for further information.
Individual	R1547	Evidence	1. This important site should be included as an integral part of the whole redevelopment. If necessary, it should be compulsorily purchased. 2. As the corner site, it should be used for a handsome new community building for Loughborough Junction. A small, modern library (see Camberwell Green) but having SERIOUS emphasis on work advice & placing people where they can learn, or improve, real employment & life skills.	1. The site is in single ownership and there is an expectation that it will come forward as one development site. There is no evidence to suggest that a Compulsory Purchase Order would be appropriate for this site and would meet the relevant tests. 2. Inclusion of a community use is a possibility reflected in the vision and policy text. The need for a new library or a community centre have not been identified in the council's Infrastructure Delivery Plan 2020 as required in this location. It is noted that there is already a centre (the Green Man) focusing on employment and work matters in the locality.
Individual	R1547	Evidence	3. Agree, the new building should be set back from the roads, leaving outdoor space for greenery (some small trees) and benches. It should be attractive and welcoming.	Support welcomed.
Individual	R1617	Vision	The above vision is so general as to make little sense. I live in this area, it is definitely not a 'town centre'.	Loughborough Junction is a designated local centre as recognised in Lambeth Local Plan policy PN10 'Loughborough Junction' and Policy ED7 'Town centres'. The vision aligns with aspirations and requirements of the aforementioned policies.
Individual	R1617	Vision	There doesn't seem to be recognition of service needs e.g. parking areas, for the businesses/residents.	Local Plan and London Plan standards for car parking would apply. In areas of PTAL 4, general car parking would not be supported. Proposals would be required to provide sufficient delivery and servicing arrangements in line with Lambeth Local Plan T7.
Individual	R1732	Vision	The Vision is wrong to describe the location as "town centre". It is nothing of the sort. Brixton and Camberwell have town centres;	Loughborough Junction is a designated local centre as recognised in Lambeth Local Plan policy PN10 'Loughborough Junction' and Policy ED7 'Town centres'. The vision aligns with the aspirations and requirements of

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			Loughborough Junction is in between. It owes its identity to the railways and has a clear visual identity provided by the "seven bridges".	the aforementioned policies. Brixton is a 'major town centre' while Camberwell is a 'district town centre' (in Southwark). These town centres are in different, larger town centre categories.
Individual	R1732	Evidence	<p>The Evidence refers to "Legibility" and a need to "announce this transport note". There is no such need; this is just an excuse to build an eyesore. Views 1-4 assert that the townscape effect would be "beneficial" but the pictures show this would not be the case. View 1 shows that the fairly open space between the railway bridges would be towered-over and hemmed in, creating an oppressive atmosphere. Views 2 and 3 show the gentle sweep of Coldharbour Lane ruined by a big block.</p> <p>The proposal is right to recommend against a tall building, but at 40m the proposal would still be much too tall for the site. The Evidence asserts at 4.5 that it "does not overwhelm" the area, but the views show that it clearly would. The proposed footprint is greedy, pressed right to the pavement, like the flats on the corner of Wanless Rd and Herne Hill Rd, and unlike the Loughborough Estate blocks which in this respect are exemplary.</p> <p>View 8 asserts that the effect on views from Ruskin Park would be "negligible". This is not the case. The picture shows clearly that the proposal will join a growing cluster of intrusive high-rise. As Vauxhall shows, once this starts it will not stop.</p>	<p>Agreed regarding the building line. The draft policy wording has been amended to make this more explicit.</p> <p>The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local townscape or character. Please see the revised evidence document for further information.</p>
Individual	R1732	Sustainability Appraisal	The Sustainability assessment asserts on p 123 that the proposal would positively influence the townscape and acknowledge neighbour relations. Neither of these assertions is borne out by the Evidence.	The approach to the site has been revisited following the consultation and new massing scenarios tested. That townscape and visual impact assessment testing has shown the indicative approach does not have an adverse effect on local character. This is set out in the revised evidence document.

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Gloucester County Council Mineral and Waste Planning Authority	R0048	General	<p>M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to:</p> <ul style="list-style-type: none"> - Gloucestershire's mineral resources; - the supply of minerals from and / or into Gloucestershire; - and the ability of the county's network of waste management facilities to operate at its full permitted potential <p>M&W OFFICERS RAISE NO OBJECTION</p> <p>M&W officers have reviewed the consultation information and have no further comments to make.</p>	Noted.
Natural England	R0163	General	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 11th January 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	Noted.
Transport for London Spatial Planning	R0312	Other	<p>We would expect a substantial reduction in on site car parking, consistent with the London Plan and NHS/public health targets of increasing the overall health of the public. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development. Contributions towards active travel connections, cycle hire provision and Denmark Hill station may be appropriate. The site is adjacent to tracks used by London Overground services and so any proposed development will need to meet the standard requirements for the protection of, and continued access to, rail infrastructure.</p>	Noted. Draft policy wording has amended to reflect suggested additions.
Mums for Lungs	R0501	Site Allocation Policy	<p>We are Mums for Lungs, a network of parents campaigning for cleaner air to safeguard the health of children in London and across the UK. The group was founded in 2017 in response to toxic levels of air pollution in Lambeth and has expanded beyond London since then. This is our response to the consultation on the Draft Site Allocation Development Plan Document.</p> <p>We examined the proposal for each of the 24 sites included in the document aforementioned and we noticed that most of the sites will be transformed into very dense mixed-purpose buildings.</p>	<p>One of the Strategic Objectives of the Lambeth Local Plan is 'Tackling and adapting to climate change'. The Council is committed to 'Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, renewable and low carbon energy generation in buildings and area regeneration schemes'. These strategic overarching principles are also applicable to the SADPD PSV.</p> <p>The Site Allocation Policy for each site, includes an Air Quality Section. This will ensure any future planning application for the development of the whole or any part of the site should address air quality in accordance with London</p>

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			<p>As acknowledged by Lambeth cabinet last November, “Air quality in Lambeth is improving, but it remains at dangerous levels for many who live and work in the borough.” Therefore, we urge Lambeth council to consider our concerns regarding the Draft Site Allocation Development Plan Document.</p> <p>Firstly, we would like Lambeth council to clarify how they will monitor and mitigate the air pollution created by the building of the new high rise real estates that will be erected on the sites identified. The considering construction sector is the biggest contributor to coarse particulate matter (PM10) in London. In 2019, it accounted for a third of PM10, against 27% for road transport.</p>	<p>Plan Policy SI1. This policy requires mitigation measures ensuring that there is no unacceptable impact with regards to air quality, both during the construction phase and later occupation.</p> <p>The Site Allocation policy also includes specific requirements for those site allocations proposed within Air Quality Focus Areas. It also refers to Lambeth’s Air Quality Action Plan which outlines the actions the council is taking towards improving air quality in the borough in the realm of planning policy but also in relation to other aspects of the council’s work.</p>
Mums for Lungs	R0501	Transport	<p>Secondly, we are asking the council to ensure that the future buildings which will be erected on the 24 sites will not lead to an increase in motorised trips across the borough.</p> <p>We appreciate that a high number of HGV driving to the sites is inevitable, but we ask that the pollution impact on surrounding roads is considered carefully and mitigated, eg. Can the HGV avoid adding congestion during peak hours, can the trips be planned to avoid passing school, nurseries and hospitals?</p>	<p>Where appropriate a Construction Management Plan will be required as part of the planning application process. The management plan will assess the impact on amenities likely to occur during the construction phase as a result, for example, of construction traffic.</p>
Mums for Lungs	R0501	Transport	<p>In order to limit car ownership, the new buildings should only include a limited number of parking spaces for cars designed exclusively for people with disabilities. In addition, it is crucial that space is allocated to affordable cycle storage and that no additional resident parking permits are delivered as a result of the new developments. Those requirements should be part of the Sustainability Appraisal.</p> <p>Of course, those car-free properties need to be easily accessible on foot, bike and by public transport. That requires the transport planning to happen very early during the planning process. It’s equally essential for the Planning department of the council, its Transport department and TFL to work very closely together.</p> <p>Last year, the Air Quality Vision for Lambeth report set out bold new targets to reduce nitrogen dioxide (NO2), and particulate matter (PM 10 and 2.5) by 2030 based on new guidance issued by the World Health Organisation (WHO).</p> <p>We are very supportive of those stricter targets as they can result in an improved quality of life especially for the most vulnerable residents in Lambeth and better future health for the youngest among us.</p> <p>With this letter, we want to reiterate how crucial it is for those air quality targets to be weaved into all the policies implemented by Lambeth council so that they become a tangible, positive reality for everyone living and working in the borough.</p>	<p>In line with London Plan policy T6 where development comes forward as a result of this site allocation this will be car-free. As a result, the number of vehicular trips generated by new development on site may be limited, helping to minimise impacts on air quality, congestion and parking.</p> <p>Other London Plan policies will be applicable, such as Policy T1 ‘Strategic approach to transport’, T2 ‘Healthy streets’ and T5 ‘Cycling’, that set the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This also requires all development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, removing barriers to cycling and creating a healthy environment in which people choose to cycle.</p>

Officer Response to Reg 18 Representations: Site 24 – King's College Hospital, Denmark Hill SE5

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ID Planning on behalf of King's College Hospital Foundation Trust	R0625	Other	<p>1.0 Introduction</p> <p>1.1 Following instructions from King's College Hospital Foundation Trust [The Trust], ID Planning were commissioned to make representations to the Draft Lambeth Site Allocations DPD.</p> <p>1.2 These representations are made in the specific context of King's College Hospital's property and land assets at Denmark Hill, which is one of London's largest teaching hospitals.</p> <p>1.3 The site is identified as a proposed allocation in the Draft Lambeth Site Allocations DPD (Proposed Site 24: King's College Hospital, Denmark Hill).</p> <p>1.4 The Denmark Hill site has a number of old buildings requiring demolition, renovation or reconfiguration to ensure the hospital can continue to meet future health needs. To be able to deliver improved health facilities on the site, a mix of uses are required to provide capital receipts to fund improvements to the hospital.</p> <p>1.5 The representations to the Draft Site Allocations DPD set out in this statement support the proposed allocation of the King's College Hospital site in principle and seek to ensure the detailed policy wording will support the planned for improvements to the hospital and provide sufficient flexibility to ensure changing needs can be met in the longer term.</p>	Noted.
ID Planning on behalf of King's College Hospital Foundation Trust	R0625	Vision	<p>2.0 Representations to the Proposed Submission Version of the Lambeth Local Plan</p> <p>2.1 This section of the representation statement provides comment on the Draft Lambeth Site Allocations DPD.</p> <p>SECTION 7: PROPOSED LOUGHBOROUGH JUNCTION SITE ALLOCATIONS</p> <p>Proposed Site 24: King's College Hospital, Denmark Hill, SE5</p> <p>Vision - support in Principle</p> <p>2.2 The Trust supports the identification of the King's College Hospital site as a proposed allocation in principle.</p> <p>2.3 The vision for the site duly acknowledges the gradual reconfiguration of the hospital estate, including King's Business Park, will enable the hospital trust to optimise clinical and associated ancillary activity at its main campus and contribute to the delivery of the King's Health Partners MedTech cluster.</p> <p>2.4 The vision highlights that the allocation of the site presents an opportunity to introduce a more coherent approach to building massing and materials and improve the general character of the hospital campus whilst giving the site a stronger identity.</p>	Support welcomed.

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ID Planning on behalf of King's College Hospital Foundation Trust	R0625	Site Allocation Policy	<p>Site Allocation Policy – Support in Part with Some Changes Required</p> <p>2.5 As set out in the introduction to this statement, the Trust welcomes the identification of the site as a proposed allocation. We also support the inclusion of King's Business Park and the proposed change of use from business and storage use to hospital and associated uses to enable the reconfiguration and optimisation of the hospital estate for clinical service provision and associated research and development activity.</p> <p>2.6 The site allocation policy sets out detailed requirements in relation to a range of development control considerations. The Trust support the majority of the detailed policy requirements but there is a need to ensure that the policy is sufficiently flexible to meet the Trust's changing needs as development on the site is likely to be needs based and therefore piecemeal in its approach.</p> <p>2.7 A masterplan for the Kings College Hospital site is being prepared and therefore as this evolves we may have further comments to make at the next consultation stage of the site allocations plan.</p>	Noted.
ID Planning on behalf of King's College Hospital Foundation Trust	R0625	Site Allocation Policy	<p>Land Uses</p> <p>2.8 The proposed allocation supports development for hospital and ancillary uses along with medical services. It also supports the change of use from business and storage use to hospital and associated uses within King's Business Park.</p> <p>2.9 Further flexibility is sought in relation to the change of use or redevelopment of the business park floorspace as this may need to be redeveloped for alternative uses to provide the Trust with the necessary capital receipts to fund improvements to the hospital.</p> <p>2.10 The policy wording should therefore be amended to support a mix of uses at the Business Park as part of the wider strategy to secure capital receipts to deliver improved facilities for residents of the borough.</p>	It is considered that the necessary flexibility is provided in the site allocation to enable King's College Hospital to achieve its strategic objectives, to reconfigure and optimise the hospital estate.
ID Planning on behalf of King's College Hospital Foundation Trust	R0625	Site Allocation Policy	<p>Transport, movement and public realm – change required</p> <p>2.11 Under the transport, movement and public realm section, the policy requires that generous areas of public realm should be incorporated, with widened footways were appropriate. This requirement is not supported.</p> <p>2.12 The provision of public realm should be proportionate taking into account the primary purpose of the site, which is to provide hospital and associated facilities.</p> <p>2.13 The requirement to provide 'generous' areas of public realm is unduly onerous when there is a need to optimise the provision of healthcare facilities on the site and these facilities cannot be provided at alternative sites.</p>	Accepted. Draft policy wording amended to reflect proposed change.

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			2.14 Whilst the Trust will seek to improve the public realm as part of their future redevelopment proposals the requirement for 'generous areas' to be provided is not justified. The word 'generous' should be removed from this part of the site allocation.	
ID Planning on behalf of King's College Hospital Foundation Trust	R0625	Site Allocation Policy	Waste Management - support 2.15 Under the waste management heading the policy supports the relocation of the existing safeguarded clinical waste transfer facility on-site and highlights there is potential for an increase in capacity of waste management operations. 2.16 The Trust supports the inclusion of waste management facility within the policy and the recognition that this can be relocated within the site.	Support welcomed.
ID Planning on behalf of King's College Hospital Foundation Trust	R0625	Site Allocation Policy	Access to open space and nature conservation – change required. 2.17 Under the 'Access to open space and nature conservation' heading the policy requires that development should address the existing open space deficiency and access to nature deficiency by meeting the requirements of Policy EN1(d). 2.18 As set out in relation to the provision of public realm, the primary use of the site is for a hospital. As demand for healthcare services continues to grow the hospital needs to optimise the available space within the site to meet healthcare needs. Addressing a deficiency of open space on this site is an onerous requirement when the need for healthcare services cannot be met on alternative sites. 2.19 Adopted Local Plan Policy EN1(part d) requires major development in areas of open space deficiency and / or in areas of access to nature deficiency to provide new on-site open space / access to nature improvements. The policy goes onto state that where it is demonstrated to the satisfaction of the Council that new on-site open space provision or access to nature improvements would not be feasible and/or effective, a payment in lieu will be sought as a planning obligation to enable the provision of existing public open space in the vicinity of the development, including their nature and biodiversity value. 2.20 The site allocation should make it clear that a payment in lieu will be sought where on-site open space provision is not feasible. In addition, given the site is in use as a hospital it is likely that the payment towards off-site provision might not be viable. The site allocation should therefore state that any off-site contribution being sought would be subject to financial viability.	A change to the policy wording is not considered necessary to avoid duplication with the Local Plan. The SADPD directly refers to Local Plan policy EN1(d), which makes it clear that a payment in lieu will be accepted where on-site open space provision is not feasible.
Helen Hayes MP for Dulwich and West	R0698	Other	My understanding is that the inclusion of King's College Hospital as a strategic site reflects the needs and aspirations of the hospital to undertake new development to provide new and expanded facilities to meet the health needs of our local population. As such, I have no	Noted.

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Norwood (Labour)			detailed comments to make at this time, though I will if appropriate make representations on behalf of my constituents who are neighbouring residents, and the staff and patients at King's College Hospital in the future.	
GLA	R0852	Other	The western part of the site is part of the KIBA and therefore any intention to redevelop this area would need to be carried out as part of a masterplan for the entire Coldharbour Lane Industrial Estate in accordance with Policy E7B of the LP2021 and the Mayor's practice note on industrial intensification and co-location through plan-led and masterplan approaches.	The site allocations DPD is a plan-led approach, so a separate masterplan for the entire KIBA would not be necessary to meet the requirements of London Plan policy E7B. There is no proposal to de-designate land from the KIBA. However, the hospital trust has a particular need to reconfigure and optimise its very constrained estate at Denmark Hill. It is a strategic healthcare provider of regional importance. This is why some additional flexibility on land uses is proposed in this small part of the KIBA that is also within the hospital's premises. This was a point emphasised by the hospital trust during the examination of the Lambeth Local Plan, resulting in a SCG between the Council and the Trust which makes a commitment to consider this issue further through the SADPD.
GLA	R0852	Other	The Mayor welcomes the intention to continue to protect the safeguarded waste site within the allocation and any plans to relocate it should be carried out in accordance with Policy SI 9 of the LP2021 which is clear that the loss of any safeguarded waste sites will only be supported where appropriate compensatory capacity is made at or above the same level of the waste hierarchy, and should exceed the maximum achievable throughput of the site proposed to be lost. Compensatory provision should be provided ahead of the release of the original waste site.	Any plans to relocate the safeguarded waste use would need to be carried out in accordance with both London Plan policy SI 9 and Lambeth Local Plan policy EN7. The following wording will be added to the land use section of the site allocation policy: 'Any proposal to relocate the safeguarded waste use would need to be comply with the requirements of London Plan policy SI 9 and Lambeth Local Plan policy EN7'.
Individual	R0883	Vision	I find it hard to navigate. I want to find plans and details and it is proving impossible	Noted. The vision and accompanying map are intended to be high level to set the overall parameters for development on the site. Further detail will be provided by the applicant should a planning application be submitted.
Environment Agency	R0886	Other	Current flood zone designation: 1 Rivers on / adjacent to site / flood defences: No Permitted waste site within 250 metres: Waste management Licence (EPR Lic no: EA/EPR/UP3190EV/A001) Groundwater Source Protection Zone: No Comments to add into site allocation text: Protect groundwater from contamination sources	Noted. The draft policy wording has been amended to include reference to Local Plan Policy EN4(f) and requires the protection of groundwater from contamination sources.
Lambeth Green Councillors	R1321	General	1. Introduction The Green Group have serious concerns about these proposed developments. Our concerns relate to the lack of evidence provided that these developments will benefit Lambeth residents, and that emissions associated with new developments of this nature undermine Lambeth council's commitment to tackling the climate crisis.	Noted.

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			<p>Prior to laying out our main issues with the developments, we would like to make a user experience point about the commonplace consultation site itself. We found the fragmented layout of the site to be functionally challenging. Having an individual page dedicated to all 14 sites, subsequent subpages, evidence, draft site allocations DPD, the HRA screening and sustainability appraisal to 'comment' on, makes it impossible to present a coherent and organised response. It not only limits the scope of the response but makes for an overwhelming and disorienting experience for anyone attempting to participate in the consultation. On a diversity and inclusion basis, the site's presentation may prevent neurodivergent people from participating fully in the consultation. It has contributed to our electing to present our response in a document format, rather than via the site, and we are concerned it will have dissuaded Lambeth residents from attempting or completing their own response.</p> <p>The other issue with what is being presented via the 'consultation' is that there is no evidence that collaboration with local communities has taken place in drawing up these plans. Whilst Green Party councillors have been present at a couple of meetings prior to publication, nothing they have contributed appears to have been taken on board. Areas such as West Norwood have their own stakeholder groups who understand the area and what will work. As an example, Green Party councillors have worked alongside the Norwood Planning Assembly in trying to help them develop their own plans for the area, which would look nothing like these. Instead of wasting council officer resources and time on 'top-down' development proposals, which will be robustly challenged by local residents, the council would do far better spending time and money listening to residents and developing 'bottom up' solutions - becoming a cooperative council, not one that only benefits corporate developers. Site 18 and 19 should immediately be taken out of this 'consultation'.</p> <p>In the following sections we outline our principal objections to the proposed developments.</p>	
Lambeth Green Councillors	R1321	General	<p>2. Offsetting of operational carbon</p> <p>It is important to understand that there are two different types of carbon emissions which pertain to buildings: 'Embodied Carbon' and 'Operational Carbon'. The former is discussed in the next section, while the latter refers to all the greenhouse gases emitted during the life of a building. This includes those produced due to e.g., electricity consumption, heating and cooling. Operational Carbon costs can be completely eliminated by building to the right standards. Developers in</p>	<p>In January 2019, the council declared a climate emergency and in July 2019 it agreed a corporate carbon reduction plan to achieve net zero carbon for council operations by 2030. The Council have also adopted a Climate Action Plan, this sets out a vision and 20 goals for the borough to become net zero compatible and climate resilient by 2030. These Council plans, in addition to national and local policy guidance will guide the development of the proposed site allocations.</p> <p>In addition, application will also be determined in line with London Plan policies. As indicated in Policy SI2 of the London Plan, operational carbon</p>

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			<p>Lambeth are currently allowed to pay a carbon offset tax, instead of building to the highest efficiency standards. Offsetting is an unrealistically cheap ‘get-out-of-jail-free’ card for developers, which will always incentivise a developer to opt for a low standard. The cost of upgrading a building later to meet 2050 standards, when you would hope these new buildings will still be standing, will be many multiples of any carbon offsetting fee. The offset tax isn’t put aside for a future building upgrade but is expected to be spent on other projects that should deliver equivalent carbon savings. The reality is those savings are rarely delivered to the required levels and require a lot more effort and money than building right in the first place.</p> <p>While the 2025 government requirement for the minimum standard to be at least ‘zero carbon ready’ has not yet come into force, ignoring this impending standard would be most short-sighted, and leaves Lambeth lagging behind other more progressive councils such as Norwich or Exeter.</p> <p>The reality of ‘zero carbon ready’ is that a building must be built to, or near to, the Passivhaus standard. Building to this standard requires it to be the design intention at the very outset to avoid unnecessary additional costs. The small premium to build to the Passivhaus standard would be a fraction of the high and predictable future upgrade costs needed to meet 2050 requirements, if the plans involved robust energy efficiencies. It would therefore be fairer, clearer and simpler to make it clear to developers that they should now be building to the Passivhaus standard. The Green Group would like to see developers building to the Passivhaus Plus standard, for instance by the addition of solar PV to generate its own energy needs.</p>	<p>emissions will make up a declining proportion of a development’s whole live-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development’s carbon impact, a whole life-cycle approach would be needed to capture not only its embodied emissions but also emissions associated with maintenance, repair and replacement, and the development’s unregulated emissions.</p> <p>London Plan Policy SI2 F and the Whole Life-Cycle Carbon (WLC) Assessments LPG require applications referable to the Mayor of London (for instance, development of 150 residential units or more, over 30 metres in height, and/or on Green Belt or Metropolitan Open Land) to be accompanied by a comprehensive WLC assessment. This assessment would calculate carbon emissions resulting from the materials, construction and the use of a building over its entire life, including demolition, as well as find mitigation measures to seek to meet the net-zero carbon target. For non-referable applications, these assessments are strongly encouraged.</p>
Lambeth Green Councillors	R1321	General	<p>3. Embodied carbon</p> <p>Embodied Carbon equivalent (CO₂e) is the amount of greenhouse gas (GHG) that is produced during the extraction, production, transportation and destruction of materials (cradle to grave). This has largely been ignored by developers and planning officers across Lambeth’s developments but is critical if the council is seriously concerned about the effects of global heating on our climate and ecology. Ideally Lambeth would have a carbon budget in the same way as it has a financial budget which it must not exceed. In the absence of a carbon budget, Lambeth must move away from pushing materials such as bricks, cement and reinforced concrete and insist that developers use materials that benefit our environment. This is particularly the case for its own in-house developer, Homes for Lambeth, over which it theoretically has complete control.</p>	<p>Circular economy principles, which favour retaining and retrofitting over substantial demolition, are embedded throughout the development plan. London Plan Policies D3 and SI7 would apply to all planning applications submitted for the site allocation sites, as well as the Circular Economy Statement London Plan Guidance (LPG). For referable applications, an applicant would need to provide a Circular Economy Statement. This should outline the options that have been considered regarding the re-use of materials, as well as an explanation of why demolition outweighs the benefits of retaining existing buildings and structures if applicable. The LPG requires a minimum of 20% recycled or re-used content for the whole building.</p> <p>In some cases, a systematic assessment will demonstrate that demolition and redevelopment is likely to be the more sustainable option in the long-term, for instance where the existing site is not fully optimised or contains</p>

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			<p>Below are a couple of materials, the use of which should not be encouraged, and which are used extensively in Lambeth:</p> <ul style="list-style-type: none"> • Cement <p>Cement is a very high CO2e emitter. Guidance from Green Building Resource GreenSpec lists cement production as the third ranking producer of anthropogenic (man-made) CO2e in the world, after transport and energy generation. This is on top of the following:</p> <ul style="list-style-type: none"> - The production of cement results in high levels of CO2e output. - 4-5% of the worldwide total of CO2e emissions is caused by cement production. - Concrete production makes up almost 1/10th of the world's industrial water use - 75% of this consumption is in drought and water-stressed regions - Cement constructions contribute to the "urban heat island effect", by absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units - Dust from wind-blown stocks and mixers contributes to air pollution - Quarries, cement factories, transport and building sites all contribute to air pollution • Steel Steel also has a significant impact on the environment: - It is CO2e intensive - It increases pollution associated with steel production (coke oven gas, naphthalene, ammonium compounds, crude light oil, sulphur and coke dust) There are many alternative materials now being manufactured, such as Hempcrete and mass timber (wood) that are sustainable and should be recommended as build materials instead of emission heavy cement: • Hempcrete Hempcrete combats carbon emissions. It is one of the few building materials that removes carbon from the air, and is a highly effective insulator for walls, floors and roofs. Unlike other insulation materials, it does not contain the Volatile Organic Compounds that emit "off-gas" toxic chemicals. As a build material, hempcrete is becoming less and less expensive. Companies like The Hemp Block Company have developed blocks that require no specialist skills or equipment to use, making installation much more cost-effective. • Mass Timber / Cross Laminate Timber As a building material, mass timber, or cross laminate timber also reduces carbon emissions. It prevents energy from escaping buildings which can reduce emissions and energy expenditure, much less energy is required in the construction process when used as a building material, meaning reduced overall emissions. Using timber also encourages the expansion of forestry and is biodegradable. It can be used for taller buildings, 	<p>buildings that cannot be effectively re-purposed or retrofitted to achieve the necessary standards of operational carbon reduction.</p>

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			provides greater fire safety than steel and is a robust and sturdy material. The use of cross-laminated timber as a building material for skyscrapers is on the rise: there are plans to build a 70-storey wood skyscraper in Tokyo (the world’s riskiest city when it comes to earthquakes) by 2024. In Norway, an 18 floor, 280-foot building completed in March 2019, making it the tallest wooden building in the world to date. Later that same year, a 275-foot building in Austria was completed, made from 75% wood. The Green Group is not recommending tall buildings but is using these examples to show the versatility of this material. Closer to home a project at 1 Bowling Green Street SE11, near Kennington Park (9 apartments over the pub) is made from Cross Laminated Timber.	
Lambeth Green Councillors	R1321	General	<p>4. Building Height and Mass</p> <p>High-rise buildings tend to have a greater environmental impact than mid-to-low rise buildings. High-rises tend to contribute to issues such as:</p> <ul style="list-style-type: none"> • Overheating, caused by the proliferate use of glass and a high concentration of inhabitants • Increasing carbon energy required to offset this through mechanical ventilation • Carbon heavy technology, needed for high-rises to function as homes and workplaces (e.g., lifts and service shafts) • Accelerated wind, which make natural cross-ventilation difficult, and can prevent the use of open balconies closer to the top of the building • Dark alleys around the base of the buildings can cause high concentrations of pollution and stagnant air • The “urban heat island effect” • Greater reliance on artificial light for surrounding properties because of shadows created by the taller buildings • Replacement of glazed cladding every 40 - 50 years • Increased operating costs • Higher construction costs, meaning the number of affordable homes is smaller • High-rise neighbourhoods result in about 140% more total emissions than a lower-rise area with the same population <p>High rise ‘skyscraper’ buildings also increase the densification of housing. You still need green spaces between them, while the services - lifts, stairs, water, wastewater, power - must be installed in a narrow block.</p>	<p>Policy D3 of the London Plan encourages all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This also applies to site allocations. Policy D3 also states that, in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, higher density developments should generally be promoted. This approach responds to the need for accommodating the growth identified as part of the London Plan in an inclusive and responsible way. This approach is in line with national policy guidance.</p> <p>As stated in Policy D9 of the London Plan, whilst high density does not necessarily imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Site allocations documents such as this one are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on any of the site allocations would be assessed on its merits against policy Q26 of the Lambeth Local Plan and associated London Plan policies. The site-specific nature of a site allocation would not set a precedent for future tall building development. The evidence document to support the draft Regulation 18 SADPD included 3D modelling of the indicative approach which was tested in an accurate 3D model of the local context. This was to aid an understanding of likely heritage and townscape impacts. The conclusion of that assessment was that the tall building in the indicative approach would not have an unacceptable effect on heritage settings. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable.</p>

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				The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.
Lambeth Green Councillors	R1321	General	<p>6. Summary</p> <p>Carbon offsetting should not be an option for developers. The proposed build materials of concrete and steel are carbon heavy and are incompatible with Lambeth Council's commitment to carbon neutrality by 2030. There are alternative materials, such as hempcrete and mass timber, which would serve as energy efficient, environmentally friendly, sustainable and safe materials to use in future developments. The height of these developments presents environmental issues, including the urban heat island effect, the use of carbon-heavy technology, preventing cross-ventilation and increased pollution. They block light for neighbouring properties, creating greater reliance on artificial light and overheating, caused by, for example, a large percentage of glass. The proposals are dismissive of the importance of community areas such as Oasis Farm Waterloo and Lower Marsh Street markets, both of which are properly used and efficient uses of land, and which currently serve the needs of vulnerable children, children with additional needs, children at risk of exclusion, looked after children, schools, teachers, families, traders, workers and local residents. The proposals have not provided enough evidence to justify the closure/impinging of these spaces and have not shown why the building of affordable workspaces, 'Medtech' spaces and new-build housing, is a better use of the land in service to the wider community, nor properly accounted for the impact the developments will have on the people and communities who benefit and rely on these spaces.</p> <p>7. Our recommendations:</p> <p>1. Accessibility. Look for a better way of laying out and delivering information to make the proposals more accessible. The commonplace site made navigation very frustrating and inaccessible, even for those with good computer experience and skills.</p> <p>2. Resident Involvement. Residents know their areas best. Start with the residents when looking for opportunities for improvements and do not impose things on them that creates extra work for everyone and leaves no-one happy.</p> <p>3. Carbon Offsetting. There should not be a need for Carbon Offsetting in Lambeth in terms of its new buildings. If this is offered to developers</p>	Noted. Please refer to officer responses to previous points made as part of this representation.

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			<p>as an option, we will fail to achieve carbon neutrality as a borough by 2050, let alone 2030. If developments need carbon offsetting, then they need to go back to the drawing board.</p> <p>4. Build Standards. Aim to build to PassivHaus Plus standards when we are building new buildings. Passivhaus Premium would be preferable.</p> <p>5. Embodied Carbon. A much greater level of importance needs to be placed on the embodied carbon of our buildings. We need to be taking greenhouse gases out of the environment, not adding to them. We should not be recommending the use of reinforced concrete or bricks, instead we should be using sustainable materials such as hempcrete and timber that lock in carbon.</p> <p>6. Building Height and Mass. Tall buildings create all kinds of problems and challenges and should be avoided in Lambeth. New buildings ought to be proportionate to their surroundings. The proposals for West Norwood should be scrapped.</p> <p>7. Community, Heritage and Cultural Spaces. COVID-19 has reminded many of us of the value of community space. We need to protect the valuable features of our local lived environment.</p> <p>8. Go back to the drawing board. With the help of local residents, identify the problems that we are trying to overcome and work with them to find solutions fit for the needs of Lambeth's citizens, our environment, and our ecology over the coming decades. These proposals do not do that.</p>	
Individual	R1347	Sustainability Appraisal	I strongly support zero private car parking on the site to discourage motor vehicle movement in the local area, with all ability access transport drop off only, to support all disabled people whether they have access to a car or not. As a local resident increasing & encouraging walking & cycling permeability through the site is very important. Also increasing cycle parking for people working & visiting the hospital.	Noted.
Individual	R1416	Vision	Opportunity to create vertical interest [and connectivity with train station and to widen main roads]	Outside of the remit of the SA DPD. As noted, Permeability for cyclists and pedestrians through the site should be provided for, linking into the Healthy Route Network.
Individual	R1422	Site Allocation Policy	Provision should be maintained for pedestrian access through the site from coldharbour lane to denmark hill, open 24 hours. The local residents make heavy use of the existing footway through the hospital campus.	As noted, Permeability for cyclists and pedestrians through the site should be provided for, linking into the Healthy Route Network.