

Appendix 2: Comments received following consultation commenced on 5 May 2016

Summary of objections	Response
Garden walls should be maintained to the existing height and the development should not afford easier access to trespassers	The applicant has confirmed that the garden walls will be retained.
The mass and height of the scheme damages the setting of the conservation area, and views into, and out of the site, and its distinctiveness, contrary to Lambeth Plan policy Q5, and the requirement that any development must "preserve or enhance" a conservation area, policy Q 22.	An assessment of the impact of the development upon the conservation areas is included at paras 6.2.21 – 6.2.26
Lambeth produced a Draft Character Appraisal of the Walcot Conservation Area (this 770 sqm site is part of it) in January 2016, inviting comments by mid-March. We, and others commented on the draft. We pointed out that the writer was not aware of this site, stating (para 4.1) "there are no significant development opportunities within the conservation area", and invited the Conservation Team to visit. They have not taken up this invitation.	The term 'significant' in this context is a major development opportunity. Officers do not consider the application site to be a major site for the purposes of the conservation area character appraisal. The team leader of the Conservation and Design team has visited the site.
In the Officer's report supporting this application, the Conservation team "has no objection" to the proposal, requiring conditions relating to materials. This is very thin as a professional Conservation judgement on such a sensitive area and we request the PAC seek supporting data.	The team leader of the Conservation and Design has provided advice on this case. He knows the site and has already visited. There has been extensive pre-application discussion and the scheme has evolved over that period in response to officer advice.
It also appears procedurally wrong. A significant site is proposed to be developed before it has even been described in an Appraisal, or (as far as we can see) visited and evaluated as to its character and distinctiveness.	The character appraisal is separate from planning policy. There is no requirement for a site to be included in the appraisal before it can be developed.
Architectural History Practice report (May 2016) commissioned by local residents notes with surprise that the Heritage Statement considers the proposals will enhance the conservation area and states (section 4.7) "It is not clear how a significant increase on the existing scale, previously acknowledged to be appropriate for this location, would constitute enhancement"	Officers do not agree that the scheme results in a 'significant increase on the existing scale' would result.
The Executive Summary of this report emphatically concludes: In summary, the	Officers do not agree that harm will result.

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<p>proposal would have a harmful impact on heritage assets and their setting. It offers no public benefits that could not be achieved by other, less harmful means. The proposals do not therefore accord with the development plan, or with national legislation and policy governing heritage assets and their setting. Accordingly, planning permission should be refused."</p>	<p>As no harm will result no public benefits are required by planning policy.</p> <p>Officers consider this is a complaint scheme.</p>
<p>The Daylight and Sunlight report by GVA has tables showing the light effects of the scheme on various floors of houses on Kennington Road. In all cases on Kennington Road it completely omits the lower or garden floor, which can be expected to suffer the greatest light diminution. This is an incomplete report.</p>	<p>The report has been updated and it has been confirmed at para 6.4.7 that the impact on the basements at Kennington Road have been assessed.</p>
<p>Nor does it measure the effects of the greater built mass on light in the rear gardens of Walnut Tree Walk. It correctly states that no overshadowing would occur, but the rise to 2 stories on our boundary would mean significant ambient light would be lost resulting in a loss of amenity and sense of enclosure.</p>	<p>The assessment carried out in respect of loss of light to gardens has been carried out in accordance with the BRE guidance and it has been concluded that there would be no significant loss of amenity. The impact upon outlook and sense of enclosure has been assessed at paras 6.4.17 – 6.4.21</p>
<p>A secondary controlled access door is recommended in the officer's report. Is a revised plan to be submitted? This particularly affects the siting of the bike and refuse shelters (which should be elsewhere) and the congestion in the entrance way.</p>	<p>The comments of the Design out Crime officer in relation to an earlier version of the Secured by Design statement noted that 'as the post strategy is not stated, a secondary access controlled door is recommended at the communal entrance area to create a secure foyer'. However further details of security measures have since been provided including details of mail delivery facilities and the Design out Crime officer is satisfied with these details. As such the secondary door will not be required.</p>
<p>The siting contravenes Lambeth Plan policies Q6 and Q 12, which require a store to be in an "enclosed, lockable space", and "fully integrated into the building".</p>	<p>An assessment of the suitability of the proposed cycle stores is included at para 6.2.13. Further details of the cycle storage would be secured by condition.</p>
<p>Arboricultural Report 23 March 2016. The Report wrongly claims (section 4.11) that the proposed building will be further from the Walnut Tree ("T 10"), than the current</p>	<p>Noted. The part of the building in question would be no further away from tree T10 however as the proposed building would not extend</p>

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<p>building. This is not the case as the plans show. The proposed building directly abuts the boundary.</p>	<p>beyond the footprint of the existing building at this point is not considered that there would be an unacceptable impact upon this tree. The Arboricultural Impact Assessment has been updated to correct this point.</p>
<p>Drainage. The proposed building has a very steeply pitched roof, to the South West, directly giving onto the boundary wall of our property, and drainage would be a problem. This needs to be addressed and is omitted.</p>	<p>Details of rainwater goods would be requested by condition.</p>
<p>PV panels are an added feature from the last application, compromising the planned living roofs on the south west of the development. Such panels are not characteristic of the area. The PAC and officers have already been advised in the Energy Strategy Report that "as the application site is located in a conservation area, PVs may not be suitable due to aesthetic reasons". Indeed, a Walnut Tree Walk resident was not permitted to put solar panels on their house roof in 2007, until it was demonstrated that they would not be visible. This rule should also apply to the Applicant. These panels, within the conservation area, would be visible to residents in Minton, Derby and Wedgewood houses, and to Walnut Tree Walk; that is, up to 80 residents. They would also raise the profile of the building. PAC may wish to refuse permission for these panels.</p>	<p>The visual impact of these panels has been assessed and has been found to be satisfactory. The Conservation and Design officer has raised no objection,</p>
<p>The officer's report (section 6.5.5) recommends the "reinstatement of the kerb at the entrance to the site". First, this is a Victorian, or earlier, cobbled carriageway, and no kerb would be "reinstated". Second, it is not clear whether this would affect the adjacent China Walk Estate carriageway, part of the same stretch of cobbled way. The cobbled way has own heritage value. There has been no Conservation comment on this. The PAC should not infer that there used to be a kerb there or that the removal of the cobbled way would be of benefit.</p>	<p>This has been clarified at para 6.5.5</p>
<p>A diagram has been submitted which assesses the massing of the proposal. This raises issues of loss of daylight / visible sky; overbearing impact especially in lower floors</p>	<p>A full assessment of the impact of the scale and mass of the proposals and the on the amenity of</p>

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<p>and gardens; loss of subordination as proposal level with mansard roof of adjacent properties; overall scale and mass is just too big for the site; setting of listed building and conservation area harmed by scale of the proposed development; notes sloping gardens to Walnut Tree Walk properties; rear extension to 59 Walnut Tree Walk not shown.</p>	<p>neighbouring occupiers is provided in the report.</p> <p>The presence of the extension at No 58 is noted in para 6.4.18 of the report.</p> <p>Revised sections have been submitted which show the ground levels adjacent to the site boundaries.</p>
<p>Mura's heritage statement contains many inaccurate and misleading statements e.g. that:</p> <ul style="list-style-type: none"> - "The overall scale is not dissimilar to the existing development on the Site, although the massing is decreased slightly". In fact, the scale is significantly increased; the footprint may be slightly reduced, but the overall massing/perception of bulk is substantially increased on account of the new two and three storey elements (see the images of the computer model used for the daylight readings); - "The new buildings will be a marked improvement in quality and form on the existing buildings without any notable change to height and less overall massing." No: there is no such improvement - but there is a very notable increase in the height and the massing/overall perception of bulk is greatly increased. <p>The conclusion of the officer's report (last time round) - that the proposed development would result in no harm to the conservation area - seems to be predicated on its backland setting meaning that any harm will not be seen. It does not properly take into account the merits of the existing buildings, or the issues of setting generally or the importance of views from within the site, across it or from public spaces and passages in and through the China Walk Estate.</p>	<p>A comparison between the massing of the existing and proposed buildings is provided at paras 6.2.4 – 6.2.6 in relation to design and at paras 6.4.18 – 6.4.21 in relation to outlook. The assessment of the impact upon heritage assets has been expanded. See paras 6.2.16 – 6.2.39</p>
<p>The draft character appraisal recognises the contribution made by the houses on Walnut Tree Walk - "the earliest buildings in the conservation area" - and Kennington Road and also by the mature gardens to the front and rear of them which "are an important feature of the conservation area and make a</p>	<p>Accepted. Officers the scheme will cause no harm.</p>

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<p>highly positive contribution". It also recognises the value of rear elevations. If the current appraisal were to be settled as a conservation statement, this development would be contrary to it.</p>	
<p>Strangely, 52 Walnut Tree Walk is not mentioned. It seems as if it is being excluded so that it can be sacrificed to development. That is completely unacceptable.</p>	<p>The site was not deliberately excluded but appears to have been overlooked in drafting the appraisal. As set out above the site is not considered to constitute a significant development site for the purposes of the draft character assessment.</p>
<p>We have commissioned an independent heritage impact assessment from the Architectural History Practice. That report is being submitted directly to Lambeth's planning and conservation officers. It concludes that the proposed scheme does not accord with the local development plan or with national legislation and policy governing heritage assets and their setting - and that accordingly planning permission should be refused.</p>	<p>A full response to this heritage assessment is provided at paras 6.2.31 – 6.2.36.</p>
<p>The increases in height - of between 2 and 3 metres - have a material adverse impact. For example, by numbers 57-58 Walnut Tree Walk the existing buildings are one storey rising to a single point under a slightly pitched pyramid roof. The proposed development is two storey, steeply pitched and offers up a bulky flank right up to the boundary of the site. Because of the steep pitch, the proposed development is already 2 metres higher than the existing building, just 2 metres in from the boundary. This results in unacceptable overbearing (as well as loss of visible sky and daylight).</p>	<p>A comparison between the massing of the existing and proposed buildings is provided at paras 6.2.4 - 6.2.6 in relation to design and at paras 6.4.18 – 6.4.20 in relation to outlook.</p>
<p>At the back of the Kennington Road properties (especially 116-122), the proposed development is approximately one and half times the height of the existing buildings. Again this leads to considerable overbearing, as well as loss of visible sky and afternoon sunlight.</p>	<p>See response above in relation to overbearing impact. The impacts upon sunlight and daylight are assessed at paras 6.4.4 – 6.4.10</p>
<p>Mura's section drawings are misleading. None of them show the basements of the properties on Walnut Tree Walk or Kennington Road or their outbuildings/rear extensions. Please compare section G-G</p>	<p>Revised sections have been submitted which show the basements and extensions of neighbouring properties.</p>

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with the more faithful representation that I have prepared (attached).	
The proposed scheme is not secure by design because it presents a low wall at the boundary with the public space/thoroughfare through the China Walk Estate which could easily be scaled, allowing access to the site and - through back gardens - all the properties on Walnut Tree Walk and Kennington Road. Ann Burroughs of the Met Police commented that "the design of these buildings creates a number of areas that are vulnerable to easy climbing access".	Additional information in relation to security has been provided and the Design out Crime Officer is satisfied with the proposals.
The vast majority of site traffic would be too large to access the site (and change direction). Therefore, nearly all the traffic will end up going all the way down Walnut Tree Walk (largely single lane), round the tight corner with Lambeth Walk (where there has already been an incident) and down Fitzalan Street, right past the main entrance to the Walnut Tree Walk primary school and the public play areas and open spaces opposite it. Even if peak drop off/collection times at the school are avoided, this is an accident waiting to happen.	A construction management plan has been submitted which details how the construction operation will be managed. The Transport officer has confirmed that this is acceptable as a draft subject to a final version being secured by a condition.
Mura's own energy statement acknowledges that "As the application site is located within a conservation area and is overlooked by listed buildings, PV's may be visually unacceptable due to aesthetic reasons". On what basis are they deemed acceptable for the conservation area and the setting of the listed buildings in it?	This issue has been addressed above.
The top elevation Proposed Elevations 1 - 4393/P/230 G - is inaccurate. The top elevation specifically states by the portion of wall shown at the back of no 59 Walnut Tree Walk "existing brick wall to be retained to original height". But this wall (which continues along the boundary of the site with no 60) is approximately 3.9 metres high - and is shown in Mura's elevation and other images at about half that height.	The applicant has confirmed that the boundary walls shown on the submitted drawings are based on surveys of the existing walls and these are drawn to their full height. The applicant has reiterated that the walls to neighbouring properties will be retained to their original height.
No basement readings are provided for the Kennington Road properties; and, on the basis that the reduction in the basement of 58 Walnut Tree Walk is stated to be 19.45% how can the reduction in the basement of 57	The basement windows to properties in Kennington Road have been assessed. Please see para 6.4.7.

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Walnut Tree Walk be only 1.64%? Given that there is currently no building at the boundary of 57, but under the proposed scheme there would be two storey element right across the back of the property, this cannot be correct.	A further letter has been provided by the applicant's consultants which confirms that the difference between the readings for the two properties is due to a difference in the internal layouts of the properties namely the depths of the rooms tested.
As was demonstrated prior to the Planning Applications Committee on 12th April, numerous resident comments on this scheme were ignored in the Officers' Report presented to the Committee. I believe the objections I have made remain valid and I will expect to see them all properly considered and analysed when this matter returns for the Committee's further consideration.	The report has been amended to address these issues.
I believe the Departure from the Development Plan relates to the requirement to market these commercial premises for employment use for at least a year prior to applying for change of use. If that is the case, the community is entitled to know the rationale and legality of this Departure which would be perverse when there is such urgent demand for employment and employment space in this area.	The reasons why the application is being recommended for approval as a departure from the development plan are explained at paras 6.11.1 - 6.11.3 of the report.
The new Mayor has said he intends to impose the 40% affordable housing requirement in new developments. I trust therefore that, if this development is approved, it will be conditional upon the provision of 40% of affordable housing.	An assessment of the scheme's ability to provide affordable housing is provided at paras 6.1.9 – 6.1.12 of the report.
The Architectural History Practice has submitted a detailed Heritage Impact Assessment which concludes: "in summary, the proposal would have a harmful impact on heritage assets and their setting. It offers no public benefits that could not be achieved by other, less harmful means. The proposals do not therefore accord with the development plan, or with national legislation and policy governing heritage assets and their setting. Accordingly, planning permission should be refused."	This matter has been addressed above
This developer has now made six applications for different developments of this site but has not once consulted either the	Whilst it is good practice for developers to carry out pre-application consultation with

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immediate neighbours or the local community prior to submitting the applications	neighbours there is no statutory requirement for them to do so.
My house in Walnut Tree Walk backs directly onto the site and shares a boundary wall with it, but the developer has not surveyed the wall or consulted on the plan to put a two storey building slap up against the listed boundary wall where there is now an open space. And yet their website says: "After consulting with community residents and other stakeholders we design energy efficient homes that enhance their surroundings, both aesthetically and environmentally." There has been no consultation prior to application.	Noted. See comment above in relation to pre-application consultation.
It is not the case that the proposed homes would enhance their surroundings. The new buildings would spoil the visual amenity of the Walnut Tree Walk residents abutting onto the site whose gardens would be sandwiched between the long standing, tall Georgian terrace and the proposed new building. Being nearly 3 meters higher than the existing building, it would block the view of the backs of the Kennington Road houses, the China Walk estate and many of the backland and garden trees as well as looming over their back gardens. This is contrary to Policy Q2 para 10.3 of the Lambeth Local Plan.	Whilst planning policies do not seek to protect private views the impact upon visual amenity is a planning consideration. This is addressed at para 6.4.26.
The loss of privacy which will result from the balconies and windows overlooking the back gardens and the backs of the terrace houses is contrary to Policy Q2.	The issue of privacy is addressed at paras 6.4.13 – 6.4.15
The developer claims (Planning Statement 6.13) that "the hard play space and parking courts of Minton and Wedgewood House...are not considered to be private spaces that warrant protection" from overlooking, but doesn't explain why that is their opinion. A playground should have the same entitlement to privacy as a back garden in Walnut Tree Walk.	This is addressed at para 6.6.4 of the report.
The developer has proposed a pathetic off-site contribution of £100,000 instead of providing urgently needed affordable housing as required by the Lambeth Local Plan Policy H2. If the site is to be redeveloped for residential use, I urge the Council to insist on the proper amount of affordable housing within the site or, if not, a financial	An assessment of the scheme's ability to provide affordable housing is provided at paras 6.1.9 –6.1.12 of the report.

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contribution equivalent to 40% of the units per the Lambeth Local Plan Policy H2.	
The developer claims in its Planning Statement 6.1 that the office use of the existing building is "somewhat discordant with the prevailing residential character of this neighbourhood" but provides no evidence for this. On the contrary, this backland area has never been residential and its recent use by the Imperial War Museum for offices and archive storage following on from the dairy which preceded it, was entirely harmonious.	These comments are noted however this does not affect the assessment of the scheme which has concluded that the principle of residential development is acceptable.
Prior to permission being given to rebuild for residential use the site would have to have been be marketed for commercial use as required by Policy ED2 of the Lambeth Local Plan but this has not happened.	This is discussed at paras 6.1.2 - 6.1.3 and paras 6.11.1 -6.11.3 paras of the report.
The proposed building being inelegant and significantly larger than the existing building would completely change the character of the backland destroying the sight lines, blocking light and introducing light and noise pollution. The design of the proposed building is not distinctive and befitting of a conservation area. The design is clearly compromised by the limitations of the site and is inappropriately bulky and looks random rather than coherent and imaginative. For example there appears to be no design rhythm to the placing of the balconies which are perhaps positioned to satisfy a planning rather than a design need.	An assessment of the design of the building is included at para 6.2.1 – 6.2.14 of the report and officers consider the design to be acceptable.
Lambeth Planning Policy Q12 (b) says refuse storage areas should (i) "be fully integrated into the building ..or be located well away from residential accommodation to avoid harm to amenity and outlook." The proposed plan does not meet this requirement. Narrowing the entrance way by lining up bins against the neighbouring garden wall and away from the proposed new building is not acceptable. It would be unsightly, unsafe and simply dumps the problem on someone else's doorstep.	The design of the refuse storage areas is discussed at para 6.2.13 of the report.
Lambeth Planning Policy Q14 (e) says that new buildings in backland sites will only be supported if (i) "the replacement buildings are	An assessment against policy Q14 is included at paras 6.2.3 – 6.2.8 of the report.

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<p>sited to maintain or improve upon existing neighbour relationships, (ii) any increases in height (in relation to existing development on the site) will not have any adverse impact (iii) forms and heights remain subordinate to its built context (iv) existing accesses are maintained and adequately provide pedestrian access, vehicle turning and access for fire appliances". The proposed plan does not meet any of these requirements - the replacement buildings would be oppressive and unwelcome, they would be significantly larger than the existing buildings, they would not be subordinate to the surrounding buildings and the only access would be impeded by rubbish bins potentially introducing bad smells, vermin and general mess.</p>	
<p>The first objection is to the scale of the buildings planned for the site. They are simply too big. They dwarf surrounding houses, and from Kennington Road would resemble a great prison wall looming over the back gardens</p>	<p>These matters have already been discussed in the responses above.</p>
<p>Not only is the scale inappropriate so is the design. This development bears no relationship to the Georgian character of the neighbourhood, and in addition it presents a grave threat to the security of the surrounding houses.</p>	<p>These matters have already been discussed in the responses above.</p>
<p>The adjoining balconies can be easily scaled, giving access to the gardens and back doors and windows of nearby houses</p>	<p>The only access into the site would be via a controlled access point at the entrance in Walnut Tree Walk. The balconies which are close to the site boundaries would only be accessible from the private amenity spaces within the development. As such it is not considered that there is a significant risk of entry to adjoining gardens from these balconies.</p>
<p>The development would also block light from the people in the basement flats of these buildings</p>	<p>The sunlight and daylight assessment has included an assessment of the impact upon basements in neighbouring properties.</p>
<p>In short the development is ugly, out of proportion, and a security hazard.</p>	<p>These matters have already been discussed in the responses above.</p>
<p>A proposal to convert the existing buildings to residential use would be acceptable to most</p>	<p>The applicant has confirmed that the walls are to remain in place.</p>

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<p>if not all of the residents affected. But what their demolition would mean is the destruction of old garden walls, trees and flowerbeds that in the case off number 122, have been more than twenty years in the making.</p>	
<p>Advice from the Environment Agency dated 18/2 (existence of which unaccountably and totally omitted from report to PAC on 12 April) states clearly "We strongly recommend that more vulnerable residential accommodation, particularly sleeping accommodation, is located on the first floor level and above." This point has just been ignored by officers and the latest plans show 6 bedrooms at ground floor level. Numerous other points raised by the Environment Agency have been similarly ignored. The Flood Risk Assessment - a "required" document for any application (updated April 2016) - does not address the Environment Agency's points and it is thus not fit for purpose.</p>	<p>The Environment Agency's comments on sleeping accommodation are noted at para 6.7.2 of the report and further analysis in relation to flood risk is provided at para 6.7.5. The Environment Agency raised no overall objection to the scheme and measures recommended by the Environment Agency to manage the flood risk will be secured by condition.</p>
<p>Advice from the Metropolitan Police dated 29/10 (existence of which unaccountably and totally omitted from report to PAC on 12 April) states clearly "The design of these buildings creates a number of areas that are vulnerable to easy climbing access" and "the cycle storage has minimal natural surveillance from the properties - recommended relocation to an area within view of the majority of the dwellings". There are other points. None of these points is addressed in the updated Secure by Design Statement (April 2016) and, indeed, some are fundamental design issues which just remain unaddressed. The Secure by Design Statement and the scheme itself are not fit for purpose.</p>	<p>The Design out Crime Officer's initial comments on the scheme were summarised in the report. As set out above additional information has been received and the scheme is now considered to be satisfactory in this regard.</p>
<p>A letter from the applicant's advisors (Savills - 12/4) demonstrates clearly the inappropriateness of the Social Housing review mechanism proposed for this application. Officers failed to mention this in their report to PAC of 12/4 alongside failing to inform the PAC of the £100k unconditional cash contribution offered by the applicant. Officers are hiding key information from the PAC.</p>	<p>The letter was received after the report was published. The issue of the affordable housing review mechanism is discussed at para 6.1.13</p>

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<p>Sections drawings submitted are totally misleading (4393/P/242) as all the distances measured for "overlooking" calculations are not the shortest distances between the vantage points from the proposed scheme to the surrounding buildings. They are also inaccurately labelled "no window or overlooking" when the exact opposite is the case.</p>	<p>Revised sections have been submitted. Officers have assessed the distances between windows in the development and in neighbouring properties.</p>
<p>Internal consultations on this project generally make no reference to the relevant Planning Policies contained in the Lambeth Local Plan and thus Planning Officers, Councillors and concerned residents have no way of knowing whether officers from other Lambeth Departments have considered all the relevant issues</p>	<p>There is no requirement for internal consultees to make reference to planning policies. Consultees provide advice based upon their specialist areas and planning officers use this advice to decide whether proposals comply with the policies.</p>
<p>The Design and Access Statement (updated 28/4 and a "required" document for any application) contains material inaccuracies - describing the entrance way as "safe and attractive for all residents" when it is narrow and full of bins and cycle racks, and is directly criticised by the Metropolitan Police (see B above), containing a drawing (page 19) which materially misrepresents the distances to Wedgwood House on the China Walk Estate and stating of the existing building "This building is of no architectural or townscape merit" in direct contradiction of the Heritage Statement also submitted by the applicant. This "required" document is not fit for purpose.</p>	<p>Comments received in relation to the revised proposal confirm that access to the site is acceptable from a security point of view.</p> <p>Officers have assessed the merits of existing building and consider that it makes a neutral contribution to the character of the conservation area.</p> <p>The submitted drawings are considered to accurately represent the distances between the proposed development and surrounding buildings.</p>
<p>Two supplementary letters (24/3 & 7/4) have been obtained on Daylight/Sunlight matters from GVA yet nothing has been done about their main report's failure to assess basement accommodation in Kennington Road properties nor the inaccuracies of the model they are using (does not reflect plan changes made). This is a "required" document and it is not fit for purpose.</p>	<p>This has been addressed in a revised sunlight and daylight report. This is addressed at para 6.4.7 of the report.</p>
<p>The "update" to the Construction Logistics Plan of April 2016 involved only appending updated drawings. It has been demonstrated that this plan is not fit for purpose and fails to address the specific problems presented by this site. This cannot be rectified by attaching a condition to a planning approval.</p>	<p>As set out above the submitted construction management plan is considered to be acceptable subject to a final version being secured by condition.</p>

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<p>There really is no point in pursuing this faulty application further. It should be rejected out of hand. Everything connected with it is improper. Documents are faulty. Officers' opinions are faulty. The PAC has been misled. External advice has been ignored.</p>	<p>The documentation submitted in support of the application is now considered to be sufficient to determine the application. The report has been revised to address the omissions that were identified.</p>
<p>As was demonstrated prior to the Planning Applications Committee on 12th April, numerous resident comments on this scheme were ignored in the Officers' Report presented to the Committee. I believe the objections I have made remain valid and I will expect to see them all properly considered and analysed when this matter returns for the Committee's further consideration.</p>	<p>The report has been substantially revised and the objections have been addressed.</p>
<p>I want to know the planning committee's response to the following:</p> <p>How can they justify a new building so out of scale and character in a Conservation Area?</p> <p>Demolition will destroy two adjacent walls of my garden and some mature trees. This would be unavoidable since my walls are attached to the existing building at 52 Walnut Tree Walk, and I urge the committee to come and see for themselves.</p>	<p>These matters have been addressed in the responses above.</p> <p>A Members' site visit has been arranged for 27 Jul 2016.</p>
<p>Policy H2 requires funding for 4 social housing units. This has not been done.</p>	<p>This has been addressed in the responses above.</p>
<p>In policy D2 para 4.8 pre-application discussions are stipulated. I have been approached by Aitch twice, in each case AFTER the applications were submitted.</p>	<p>This has been addressed in the responses above.</p>
<p>Policy Q5 paras 10.12 to 10.18 provides a list of failures by the developers, as they have not paid any regard to the "distinctiveness" of the Walcot and China Walk conservation areas; nor have they responded to the "local context and historic character... height and massing... relationship with other buildings, materials, architectural detailing". This is especially apparent with regard to fenestration. It is not an "excellent design" it started as a jumble of buildings and has been ineptly rehashed in an attempt accommodate planners' comments; it does not "make a positive contribution to the historic context" or "enrich its locality and improve the quality of people's everyday architectural experience".</p>	<p>This has been addressed in the responses above and in the relevant sections of the report.</p>

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The current subservient form of the existing buildings conforms to all these conditions, however.	
Policy Q9 deals with landscaping. The developer's plans have no relationship with the surrounding gardens, many of which will be disturbed by demolition. I am not alone in having protected trees in mine (their position is marked wrongly on the developers plan, and any demolition will kill them.) They are proposing to remove some semi-mature trees on their own site, they are not creating "new habitats/areas of nature conservation"; they are proposing beds in permanent shade, where plants are most reluctant to grow, they are not providing "strong boundary treatments" but instead unsightly high walls.	<p>The submitted Arboricultural Impact Assessment has been checked and the Tree officer is satisfied with this.</p> <p>Further details of the proposed landscaping will be secured by condition and the suitability of the proposed planting will be assessed at that stage.</p> <p>A further condition requires the provision of measures to enhance biodiversity.</p> <p>The issue of boundary treatments is discussed at para 6.2.10 of the report.</p>
The high blank wall proposed at the end of my garden has the height and aspect of a prison wall. (South-east elevation - drawing 4393/P/231G) It is 8.5 metres, contravening the 2 metre boundary stipulations made in Policy Q15. "Increases in height" clearly have the "adverse impact" that policy Q14 is intended to protect us from. There is absolutely no doubt that this proposal compromises my - and others' - rear garden amenity and has an "adverse cumulative impact" on rear gardens (policy Q14 paras 10.53 and 10.54).	As above.
In relation to the impact at 122 Kennington Road - there are two sitting-out areas in the garden, because there are two households, and that their "overlooking" measurements (from the balcony in another proposed wall abutting my property), are utterly misleading.	The presence of sitting out areas in these gardens is noted however due to the position and inset design of the balcony it is not considered that an unacceptable loss of privacy would result.
No light readings have been taking from the basements of Kennington Road, and for that reason alone I believe the report to be redundant.	This has been addressed in the responses above.
The proposed development (which represents an increased wall height of almost three metres) will block out all sky currently visible from the windows of the basement flat.	This has been addressed in the responses above and in the relevant sections of the report.
The Daylight and Sunlight report by GVA has tables showing the light effects of the scheme	This has been addressed in the responses above.

Summary of objections	Response
<p>on various floors of houses on Kennington Road. In all cases on Kennington Road it completely omits the lower or garden floor, which can be expected to suffer the greatest loss of light.</p>	
<p>The Daylight and Sunlight report does not measure the effects of the greater built mass on light in the rear gardens of Walnut Tree Walk. It correctly states that no overshadowing would occur, but significant ambient light would be lost resulting in a loss of amenity.</p>	<p>The overshadowing assessment examines the impacts of the development upon available sunlight to gardens in accordance with the BRE guidance. An assessment of the impact upon ambient light is not required. The amenity impacts arising from the massing of the building have been assessed in relation to outlook at paras 6.4.17 – 6.4.21</p>
<p>The Architectural History Practice report (May commissioned by local residents, examines in great detail the Heritage Statement commissioned by the Applicant. It categorically concludes that the Application should not be approved, as it is in contravention of the Lambeth Plan, legislation and national policy governing heritage assets.</p>	<p>This has been addressed in the responses above.</p>
<p>As was demonstrated prior to the Planning Applications Committee on 12th April, numerous resident comments on this scheme were ignored in the Officers' Report presented to the Committee. I believe the objections I have made remain valid and I will expect to see them all properly considered and analysed when this matter returns for the Committee's further consideration.</p>	<p>The report has been revised and the objections have been addressed.</p>
<p>My initial observation of the Revised Construction Logistics Plan, is that it is very much a boiler plate CPL and contains very little detail - which I hope will be provided and debated before any works can proceed.</p> <p>The CPL does however beg several questions - some of which I list below:</p> <p>4.5 gated access - will the listed gates remain in place throughout the works - or will they be replaced by a temporary barrier and then restored on completion?</p> <p>4.7 How many parking bays must be suspended? The hundreds of people who live in WTW will still have to live and park there.</p>	<p>The Transport officer has confirmed that this document is acceptable as a draft. A final version will be secured by a condition.</p>

Summary of objections	Response
<p>5.4 who are the 'relevant parties' to be consulted when the CPL is varied? 5.16 no mention of where skips will be sited - on street or on site? 6.4 necessary Road alterations sound alarming - but no detail provided. 6.5 'large construction plant and machinery delivery' may require road closures - makes me wonder how plant of such a scale will enter the site through a 3m x 2.9m tunnel? 6.7 pedestrian route closures - are not specified Site Access Plans A and B assume these large vehicles will turn in WTW - where in practice it is hard to turn round a car.</p>	
<p>The recognised needs for office space and employment opportunities locally has not been properly tested according to statutory requirements.</p>	<p>This is addressed at paras 6.11.1 - 6.11.3 of the report.</p>
<p>The image in this plan of the only access to the dwellings under my flying freehold, does not show the proposed bin stores and cycle park - which the Applicant and his PR Agent assured me would be moved from this entrance which is directly under my kitchen window - and as such the image submitted to the Council gives a false picture and breaks the agreement made with me personally.</p>	<p>The location of the bin stores and cycle stores is shown on drawing 4393/P/221L. The location of these stores is assessed in the report and is considered to be acceptable.</p>
<p>The construction plan was not included and as all demolition will have to be conveyed through the small tunnel under my house - originally designed for a horse and cart - it is a considerable worry to me and the safety of my building. I have invited officers and any members of the PAC to view the site and the small access area but to my knowledge this invitation has not yet been taken up.</p>	<p>The construction management plan explains that small vehicles will be used for this purpose and this is considered to be satisfactory. The access is considered large enough to accommodate cars and small vans. A site visit has been arranged for 27 July.</p>
<p>The Report states the pavement at the entrance will be 'reinstated' and a parking space added - there has never been a pavement outside the site and the existing cobbled road is documented in photographs taken of the entrance to the dairy as it then was, in 1890. This is a local heritage matter and a raised pavement and kerb will have to be crossed by cyclists.</p>	<p>This has been clarified at para 6.x of the report. Cyclists will need to negotiate the entrance gates and so are likely to wheel their bicycles out of the site onto the road rather than ride directly out of the site onto the street.</p>

