15/06029/FUL – 17 Newport St – Representation on behalf of KOVF, the Neighbourhood Plan designated body for the area.

* In Newport St we now have a Stirling Prize winner in the form of Damien Hirst’s new art gallery
* As a commentator remarked on 7 Oct “The spatially deft, beautifully crafted building, by architects Caruso St John, is a perfect metaphor for taste in the face of the blinged-up architectural horror show apartment blocks springing up in the area – architectural degeneration posing as urban regeneration.” [Jay Merrick]
* And here comes just such a block, the subject of this application, which has the sheer brass kneck to claim (D&A Statement para 1.2 aspiration 3) to be “a beacon”, signposting the way to Hirst’s Gallery!
* Officers are right to recommend refusal, echoing the concerns of English Heritage about impact on views and heritage assets. This is consistent with the Council’s declared position on the negative impact on the setting of the Kennington Conservation Area of high rise tower blocks (eg CA Statement paras 2.22, 2.32)
* But the suggested **grounds** are weak if you actually wish to win any appeal, and **should be supplemented as regards the sheer dominating bulk of the proposed tower, its inappropriate, precedent creating, breakout from the VNEB Opportunity Area and the inadequacy of the affordable housing offer**
* You only have to look at the front cover of the Design & Access Statement to see that this is an **overbearing bludgeon** of a building, parachuted into its surroundings without regard to neighbouring built forms. It gives not a fig for local character (MALP Policy 7.4), local amenity (Lambeth Local Plan (LLP) Policy Q2), or urban design guidance for new development (LLP Policy Q7). It is oblivious to any impact on neighbouring KIBA businesses, long or short term.
* London Plan policy for tall buildings says, in part (MALP Policy 7.7).

“Tall and large buildings should not have an unacceptably harmful impact on their surroundings.

**Planning decisions**

B Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria below. This is particularly important if the site is not identified as a location for tall or large buildings in the borough’s LDF.

C Tall and large buildings should:

a **generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport**

b only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building

c relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;

….

* Backed up by LLP Policy Q26, you only have to read this to see how the application fails repeatedly – not in the OA, not in the CAZ, not identified in LLP, no strategy, just an opportunist one off, adverse affect on character, ill relation to surroundings, PTAL as little as 2!
* If you allow the weasel “generally” to permit this break out of tall towers, you will create a precedent for the whole of this part of North Lambeth, which developers will exploit ruthlessly – you have been warned.
* The GLA regarded the original offer of £100,000 for offsite affordable housing as very modest (Officer Report para 4.2.4(1), and the final offer of £236,203 is hardly much better, not even buying a studio flat in the neighbourhood. Can we, as the interested public, check the assumptions made in concluding that this is a fair result?
* No we cannot, because Lambeth and the developer are keeping the viability studies secret. In March 2016 the Mayor gave the following guidance (Housing SPG para 4.2.2), following an Information Tribunal judgement:

“The Greenwich judgement stated “We find it particularly hard to accept that the pricing and other assumptions embedded in a viability appraisal are none of the public’s business. Public understanding of the issues fails at the starting line if such information is concealed”. **Therefore, the Mayor encourages the transparency of information to increase public trust in the planning process and asks developers to keep confidential information to a minimum.”**

* But Lambeth continues to be prepared to receive such material on confidential terms, as in this case, inhibiting proper “public understanding”. **Lambeth is well behind the curve here, and should follow the lead of boroughs such as Islington, which insists on transparency.**
* But in the meantime, as the Committee will have seen the viability studies and we have not, please help restore the trust of us the interested public, as regards
	+ Whether the Existing Use Value benchmark is consistent with the 2015 sale price of the leasehold flat, and whether the developer is being allowed a 20 or 30% uplift on it, despite being a developer already in possession
	+ How the construction cost estimate relates to the Mayor’s toolkit benchmark for towers of this height
	+ As the intention is to rent out, rather than sell the flats, what rentals, and what discount rate is being assumed to value the final development, and
	+ What %profit on this GDV is being allowed to the developer?
* **Unless the Committee is satisfied with these assumptions, it should regard the affordable housing offer as inadequate,** and the development in breach of LLP Policy H2
* **So, reject this development, and add breach of MALP 7.4 and 7.7, and LLP Q2, Q7, Q26 (and subject to the above, H2) to the charge sheet.**

David Boardman 10 October 2016

Kennington Oval and Vauxhall Forum