

# Submission of the Clapham Junction Action Group

**For consideration by the Planning Committee in Advance of Consideration of  
Planning Application 2012/1258 – Peabody's proposal for redevelopment of Peabody  
Estate St Johns Hill SW11**

## **Who are we?**

Clapham Junction Action Group (CJAG) is a local action group founded in November 2008 in response to the proposals of the Metro Shopping Fund LP to develop the site of Clapham Junction Station. The group has no formal membership or funds, but relies upon the enthusiastic support of many local people to publish and distribute newsletters informing people about local planning and encouraging them to make their views known.

CJAG has been involved in multiple local issues regarding the future of the Clapham Junction area and Wandsworth borough:

- Submissions on local developments (Metro Shopping Fund's project to build two skyscrapers at the station site, hotel project on Falcon road, Ram Brewery inquiry, Grant road/Winstanley development, Bolingbroke project...)
- Regular participation and comments on Wandsworth Borough Council's (WBC) strategic planning documents, including the Core Strategy (including hearing with the government inspector), the development framework documents (CJAG took part of the consultation on the Sustainable urban design and the quality of the environment and the Site Specific Allocation Documents on Clapham Junction's area, including the hearing session with the government inspector).
- CJAG has published a dossier for consideration on the future of Clapham Junction station. It has been widely distributed to the community as well as local stakeholders (Council officers, local Councillors, local newspapers, Network rail, local business group...etc).

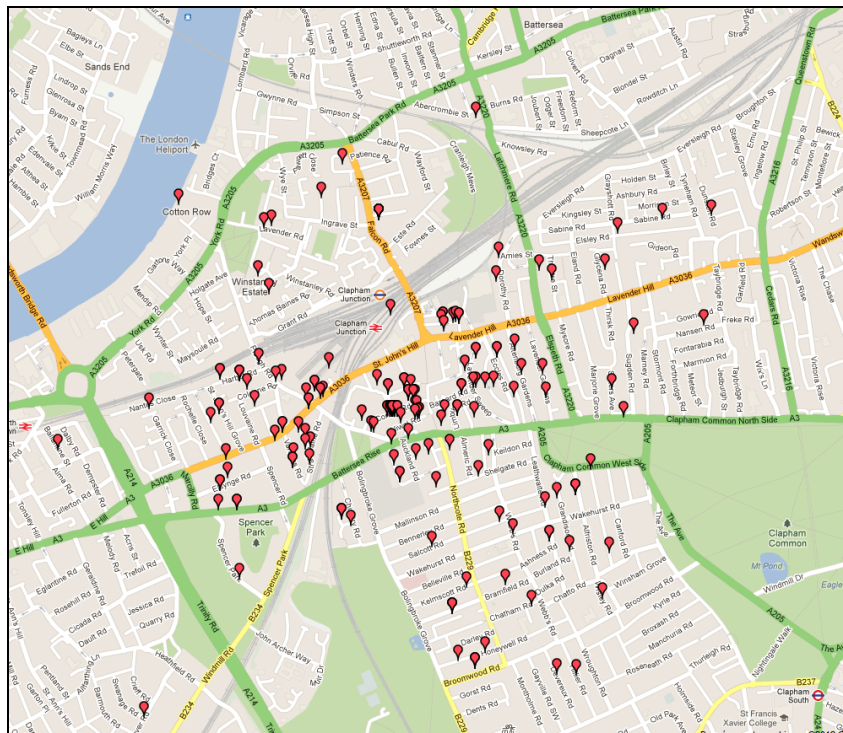
**CJAG simply seeks to represent the views of local people. We have therefore conducted a detailed review not only of Peabody's proposals, but also of the hundreds of invited public responses on Wandsworth Council's website. This report seeks to summarise these views and to bring a great number of them to the forefront for wider consideration by the Council members.**

We acknowledge that Peabody made some effort to organise two exhibitions (Tuesday 15 November/Saturday 19 November 2011 – 2pm and Tuesday 26<sup>th</sup> June 2012) along with two meetings with amenity societies (with the Wandsworth Society on Thursday 19th January 2012 and earlier with a few members of the Battersea Society) and one newsletter (in addition to the leaflet distributed by the Council within the 200 yards distance area of the site).

However the size of this proposed development that would be the tallest on the south side of Clapham Junction area required much more publicity than this and CJAG has succeeded in raising the level of awareness about it far beyond that achieved by the developers. As a consequence, the Council received hundreds of well-reasoned representations that should not be ignored.

## Overview of Public Consultation

On Wednesday 11<sup>th</sup> June we counted about **300 letters of objections** on WBC planning website and... **4 support letters**. The map below, showing some of the objections according to their address (*when available*), confirms the level of concern, not only in the close vicinity but also in the largest part of Northcote and Shaftesbury wards.



All of the objections talk about the inappropriate size and density of the plan. Many letters complained that, after nearly 1000 objections received by the Council 3 years ago rejecting tall buildings for Clapham Junction, they needed to go through the same arguments again. Letters also express concerns about:

- general pressure on public services in the busy Clapham Junction area as a result of a likely doubling of the Peabody estate's population
- loss of mature trees and general green space as a result of building density
- huge inevitable pressure on parking in already congested local streets as a result of a grossly inadequate planned underground car park on the estate
- a very badly chosen main vehicle access point
- a six year construction period

By contrast, there are only a few support letters. One<sup>1</sup> accuses CJAG of “false claims” and makes a direct but ridiculous comparison between the Northcote area, consisting of 2-3 storey Victorian and Edwardian houses, and the towers built in the 60s on the north side of Clapham Junction in Latchmere ward. The second one comes from the representative of the Peabody Estate St John's Hill Tenant's Association<sup>2</sup> and highlights the involvement of the TA and tenants with the Peabody project team.

However this latter observation is contradicted by several objection emails from Peabody's tenants (or tenants' friends), who not only list similar arguments to many other objectors, but also say they were not informed or were mis-informed by Peabody. To quote from some of these:

*“I have lived in the estate for over 20 years [...] Tenants have been consulted over the last four years but as far as I am concerned, we have never seen the latest proposal”<sup>3</sup>*

*“Relatives of mine live on the Peabody Estate and they are very concerned that they will be made homeless if this development goes through. They have been living there for two years but do not have assured status. They were never informed of these possible developments when they took on the tenancy.”<sup>4</sup>*

*“To top the whole thing off, I have been in contact with Peabody on many occasions, due to the substandard condition of the property, and at no point has anyone mentioned that nothing will be done to my property as they are going to knock it down anyway.”<sup>5</sup>*

*“Peabody are very active in still renting empty properties on the current estate on Assured Shorthold Tenancies. [...] I am sure that many of these tenants would not have accepted their properties if they had known, in advance, that within a short time they would be given notice and find themselves homeless.”<sup>6</sup>*

*“We have friends who live on the Peabody Estate, and whilst I appreciate it may need redevelopment there are many good things about it. It has a peaceful, car-free atmosphere and the buildings are on a human scale. I have lived in a high rise council block myself in Lambeth which, in contrast was alienated, dirty, crime-ridden and violent.”<sup>7</sup>*

In addition, for anybody who has seen the Feedback Form available during the exhibition in November 2012, it was very difficult to answer ‘No’ to any of the questions. For example, is anybody going to say No to “Do you support the concept of integrating the Peabody site into the surrounding streets”? Maybe the question would

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<sup>1</sup> Email from Andrew Healey to the Planning Officer dated 6th May 2012

<sup>2</sup> Email from Sue Marlow to the Planning Officer dated 8<sup>th</sup> May 2012

<sup>3</sup> Letter from O Regan, Peabody Estate to the Planning Officer dated 21<sup>st</sup> May 2012

<sup>4</sup> Email from Dr R Cant to the Planning Officer dated 29<sup>th</sup> April 2012

<sup>5</sup> Email from Richard Gray, O Block, Peabody Estate, to the Planning Officer dated 17<sup>th</sup> May 2012

<sup>6</sup> Email from Rob, 12P Peabody Estate to the Planning Officer dated 22<sup>nd</sup> April 2012

<sup>7</sup> Email from Ed Fawssett to the Planning Officer dated 5<sup>th</sup> May 2012

have been more appropriate as: *“Do you think the proposed scheme will integrate the Peabody site into the surrounding area?”* This is just an example... This has been used, disingenuously, by Peabody, in claims that the plans have 90% support. The fact is that there is strong opposition among local residents to significant elements of the plan.

## Misleading images

The consultation leaflet, distributed to local homes by Wandsworth Council to publicise the proposal, re-used the developers own misleading visual material. This has successfully downplayed the scale of the proposed development both by employing wide-angle lenses and by cutting the towers at the top in order to minimise their impact.

Wide-angle lenses have a profound impact on perspective: they make objects seem smaller, with the result that you move closer to fill the frame. The act of doing this exaggerates the difference in size in between nearby objects and those farther away.

We have reproduced the distortion created in our example below<sup>8</sup>:



Peabody's representation allows them to diminish the impact of the developments, as the taller buildings will appear lower than they will be seen in reality!

In 2009, along with the Wandsworth Society, the Putney Society and the Battersea Society we submitted a joint statement on tall buildings where we specifically asked for appropriate publicity and the use of images which demonstrably reflect the true appearance, height and mass of the development measurable against neighbouring buildings.

The Development Management Policies Document states, para 2.49 page 23:

*“Detailed visual assessments submitted with applications in order to demonstrate compliance with this policy will be required to accurately represent*

<sup>8</sup> For more details about the misleading images provided during the consultation (January-May 2012), you can read our article: <http://cjag.org/2012/06/19/how-peabody-is-providing-misleading-images/>

*what would be seen by the human eye. **The use of wide-angle lenses, for example, can distort perspective and distance, and thus the relationship between the foreground and background, and this will not be acceptable**".*

Despite the policy adopted by the Council, Peabody submitted a document called "Landscape Visual Impact Assessment: Information Supplement" where they explained the methodology used and wrote (page 6):

*"For local views a wide angle lens of 24mm or 35mm was used"*

It is a professional disgrace that Wandsworth's officials should effectively collude with Peabody in utilising visual material that is wilfully misleading and which breaks the Council's own rules.

### **Peabody's general attitude**

Less than 3 years after the thousand strong outcry against tall buildings in Clapham Junction, the local community is again confronting a project submitted by developers intent on maximising their profits through gross overdevelopment while ignoring the concerns of the local population. *"At the end of the day, the Council officers are the one to be convinced in order to get a planning application"*, not the local residents, we were told during the meeting in January 2012.

Several local residents felt deceived by Peabody and wrote:

*"Throughout the initial consultation period I stupidly believed that Peabody wanted to understand residents' opinions and wished to use their knowledge of the local area, but I now view this consultation period to have been a total waste of time as the planning application has arrogantly ignored what residents have said."*<sup>9</sup>

*"Local residents welcomed their consultations, and were enthusiastic about engaging with Peabody [...] by taking on board our concerns and amending the plans accordingly. This has not been the case: the plans as submitted are exactly the same as they were 6-9 months ago, so all the presentations and discussions seem to have been a waste of time in any case: the exercise has been largely cosmetic."*<sup>10</sup>

*"Peabody has held the community liaison sessions, although I can see no reference of how they have taken the views and thoughts of the local community on board."*<sup>11</sup>

*"I have attended several meetings with the development group which were and are defined as 'consultations' with local residents. Oddly, but not unusual,*

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<sup>9</sup> Letter from Jacqueline Bowers to the Planning Officer dated 1<sup>st</sup> May 2012

<sup>10</sup> Letter from Simon and Olivia Ford to the Planning Officer dated 5<sup>th</sup> May 2012

<sup>11</sup> Email from Nick Knight to the Planning Officer dated 30<sup>th</sup> April 2012

*nothing has changed in any appreciable way the original proposals for the project. [...] Several of the really contentious aspects have continued to be dismissed as non-negotiable as evidenced in the planning application.”<sup>12</sup>*

CJAG also took part of the “consultation” process and submitted a representation on November 25<sup>th</sup>, 2011. We received an answer from Peabody saying:

*“As you might imagine we are in the process of collating the comments and feedback received over the past few weeks but I will respond to your suggestions, observations and concerns in due course. [...] A sensible time for this would be next month when we have more detail from the Architects of the proposed buildings.”<sup>13</sup>*

Six months later and while Peabody’s proposal has been submitted in the meantime, we are still waiting for the response.

The Council has the responsibility to insure that the public can contribute meaningfully and that its opinion and concerns will be properly addressed. So far it is clear that developers too often assume that the ‘consultation’ is only a mandatory aspect of the procedure that they have no choice but to organise, but without any need to consider properly.

## **The Duty to Reject Peabody’s Proposal**

The current Peabody Estate is architecturally undistinguished, badly laid out, and poorly integrated with the rest of Clapham Junction town centre. So there is plenty to be said in principle for a redevelopment and the proposed new scheme has many good points. It will conform with new government criteria regarding repair/redevelopment of estates; it will open up the estate to the wider locality.

However the reasons why this application must be rejected may be listed as follows:

- 1. Appearance and Lack of Human Scale**
- 2. Community Impact**
- 3. Loss of Amenity**
- 4. Disruption and Planning Blight**
- 5. Environmental and Heritage Impact**

These areas are each considered in detail below:

### **1. Appearance and Lack of Human Scale**

Development must be appropriate to local context physically, socially and culturally and human scale remains an essential consideration of any development.

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<sup>12</sup> Email from James Robert-Poulain to the Planning Officer dated 17<sup>th</sup> April 2012

<sup>13</sup> Our letter of comment and Peabody’s response can be found on our website:

<http://cjag.org/2011/11/30/peabody-redevelopment-our-response-to-the-consultation/>

It is not surprising that 3 years after the proposal of erecting two 42 towers, the same objections come again on a proposal including buildings that will more than treble the size of most of the surrounding.

### Scale and Massing

The existing 1930s estate consists of 5 storeys and lies at the heart of an area of relatively homogenous Victorian and Edwardian low rise development. It is unattractive and forbidding; the accommodation is sub-standard. It's great that it could be replaced with something better. However, there is no justification for redesigning with buildings that are 2 or 3 times the existing height. Any development proposed to take its place should respect the historical and architectural homogeneity of its neighbouring buildings.

The most common sentence that we could see in many objections was:

*"The buildings are far too high and are completely out of character with the surrounding Victorian houses."*

There is no escaping the fact that, if the plans are implemented as they stand, the new estate will have a detrimental visual effect on the whole neighbourhood. The height of the current buildings is five storeys, higher than most local buildings, but not substantially so. Yet it seems that several of the proposed new buildings will be ten storeys, and at least one twelve storeys, more than doubling the height and the massing of much of the estate.

A local resident in Cologne road wrote:

*"Most would rise dramatically above the surrounding buildings, both residential and commercial. Due to the size of the estate, it would appear rather as a large 'lump' on the landscape.... Somewhat 'volcano-like'! This would not fit with the surrounding landscape, which gives a feeling of homely warmth. It would also interfere with some views, reduce daylight and air flow."*<sup>14</sup>

When coupled with the fact that the estate lies at the top of St John's Hill, on comparatively much higher ground than the rest of the town centre (something which Peabody's exhibition in November 2012 failed to illustrate – why?), there can be no doubt that the proposed scheme will create a looming, architecturally distinct, presence, dominating the locality in a way that the existing estate simply does not.

Nearly five years ago (planning application 2007/5242), planning permission was granted for the development of an 8 storey building near Peabody (Lumière apartments). The added height was permitted by the Council against local opposition as an *exception* to existing planning guidance - in order to maintain /sustain the Grade II listed old Granada auditorium underneath. The result is a massive, anomalous

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<sup>14</sup> Letter from Joyce Basco to the Planning Officer dated 2<sup>nd</sup> May 2012

building on the north side of St John's Hill. To permit a series of much higher buildings just across the railway bridge would make a mockery even of this *exceptional* ruling.

A local resident said:

*"It is interesting to note that the development of the Granada seems to be going on for ever and if anything is growing into an eyesore by being a storey or two too high. Compare this with the two new developments completed on Strath Terrace and which are opposite the Granada. These buildings are of a sensible height and blend in pleasantly with the surroundings. This is something that the Peabody Developers could consider in their plans."*<sup>15</sup>

History and experience suggest that multistorey blocks, which are significantly out of kilter with the rest of Clapham Junction, will simply become the new normal (at least for developers, if not for Council officers). Five years ago, the area consisted almost exclusively of 3-5 storey buildings. Within a few years we have moved to 8 (an exception) and now potentially to 12 (another exception?).

The LDF Site Specific criteria states that anything over 5 storeys on this site is a tall building and that the northern part of the site, within the town centre boundary, is sensitive to tall buildings. We think the 8, 10 and 12 storeys proposed here are unacceptable; they will dominate a low-rise area and set an unwelcome precedent for the future. Even the six-storey building facing the Common is defined as "*likely to be inappropriate*" in the Council's policy.

A local resident said:

*"The idea of high-rise building in our low-rise environment is truly horrible... the whole point of living in Wandsworth is its pleasant, leafy streets, and human-scale buildings. [...] Such 'small is beautiful' ways may be less efficient bureaucratically, but I am sure in the long term would lead to a better balanced community and fewer social problems. Please don't allow planners to make the same mistakes we are now regretting from the 1960s, we don't want to become like Croydon!"*<sup>16</sup>

Others stated:

*"I am concerned by the continued attempts to increase the height of buildings in an essential low-rise area. This application is being made despite the 'twin towers' Clapham Junction development being declared unsuitable. I believe the same arguments apply in terms of the proposed Peabody development."*<sup>17</sup>

*"The height of the proposed building is unacceptable and will make a far too dramatic dent in the skyline. The residents of Clapham Junction have already*

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<sup>15</sup> Letter from David Bowers to the Planning Officer dated 6<sup>th</sup> May 2012

<sup>16</sup> Email from Irena Hoare to the Planning Officer dated 21<sup>st</sup> May 2012

<sup>17</sup> Email from Keith mainland to the Planning Officer dated 6<sup>th</sup> May 2012



*spoken as one of their unwillingness to accept over-height buildings, yet, once again, one is planned.”<sup>18</sup>*

*“My objections are very much in line with those I, with many others, voiced three years ago when the Twin Towers project at Clapham Junction was being considered.”<sup>19</sup>*

*“Having managed to oppose the development of a [16-storey] hotel at Clapham Junction itself it is exhausting to think we have to go through the whole process yet again.”<sup>20</sup>*

*“We said as a community NO to the Clapham Junction Station proposed skyscrapers...and as a Community we again say no to this yet another attempt at the thin edge of the wedge.”<sup>21</sup>*

Last but not least, when new ideas for a much needed redevelopment of Clapham Junction station emerge in the future<sup>22</sup>, almost any extravagance could be proposed. Who can credibly argue that 12 potential storeys on the Peabody will not set a new precedent for height in what is currently still a stylistically cohesive and relatively low rise environment? Many local residents are convinced and voiced their concern for the area:

*“No tower blocks should be allowed. Everywhere tower blocks set a precedent for more tower blocks.”<sup>23</sup>*

*“I also feel that the taller the buildings you allow on the Peabody site, the more of an excuse developers will feel they have to re-submit future plans for the skyscrapers at the station.”<sup>24</sup>*

*“The redevelopment of the Peabody Estate is clearly opening the backdoor to set a precedent of high rise buildings so that in the future the project of redevelopment for the railway complex may be approved”<sup>25</sup>*

In addition, despite claiming to, the developer has actually made negligible attempts to integrate design elements of the proposed buildings with already existing local architecture (comparisons with new developments in Latchmere Road or the new buildings



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<sup>18</sup> Email from Laura Botton to the Planning Officer dated 15<sup>th</sup> May 2012

<sup>19</sup> Email from Timothy West to the Planning Officer dated 7<sup>th</sup> June 2012

<sup>20</sup> Letter from Sarah Patey to the Planning Officer dated 15<sup>th</sup> May 2012

<sup>21</sup> Email from Garry de la Pomerai to the Planning Officer dated 20<sup>th</sup> May 2012

<sup>22</sup> According to an article published in the Architects' Journal, Peabody's Architects Hawkins\Brown along with AHMM, BDP, Terry Farrell and Wilkinson Eyre have been appointed recently by Metro Shopping Fund to look at resurrecting the multi-million pound redevelopment of Clapham Junction station.

<sup>23</sup> Letter from Adrian White to the Planning Officer dated 15<sup>th</sup> April 2012

<sup>24</sup> Email from Lorna Menzie to the Planning Officer dated 7<sup>th</sup> May 2012

<sup>25</sup> Email from Chantal Walters to the Planning Officer dated 7<sup>th</sup> May 2012

at the crossroad of the Lumière Apartments that does reflect the surrounding).

A local resident wrote:

*“On Comyn and Eckstein the roofline and recess from the road of the existing terraces should be matched by the new development. This is to ensure the site blends into its surroundings and avoids blighting the environment of those roads by letting there be enough light and space. Appropriate design and materials should be used to blend old with new e.g. natural brick and bay windows.”<sup>26</sup>*

**The scale and density of the proposed development should remain in harmony with its immediate surroundings. It singularly fails to.**

**Wandsworth Council has no electoral mandate to transform the Clapham Junction neighbourhood through the kind of architectural entryism which Peabody proposes.**

The site is inappropriate for tall buildings

An independent inspector has been conducting hearings in October 2011 regarding the Proposed Submission versions of the DMPD (Development Management Policies Document) and SSAD (Site Specific Allocation Document), which provide detailed policies to support the delivery of the Core Strategy. On the subject of Clapham Junction area, CJAG (supported by the Battersea Society and the Wandsworth Society) was able to demonstrate before the attendees<sup>27</sup> that the changes made to the policy by Council officers had the aim of accommodating Peabody’s plan.

On the Core Strategy (CS) examination (2009-2010) Peabody Trust wrote:

*“The Peabody Trust support the broad locations identified on Map 15, which are considered to be appropriate locations for tall buildings. The Peabody Trust support draft Policy IS3 and consider that sites that are located close to public transport nodes and key town centre services and facilities are appropriate where regeneration benefits can be demonstrated through the use of higher density development.”*

However that argument was refused by the government inspector during the examination of the CS as shown in response to questions CJAG submitted Dec 8th 2010. The Council replied:

*“In last year examination, the government Inspector’s conclusion was that only sites within town centres, focal points of activity and Nine Elms near Vauxhall*

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<sup>26</sup> Letter from Beth and Oliver Potter to the Planning Officer dated 20th March 2012

<sup>27</sup> The meeting was organised on October 11th, 2011 in Room 123, Wandsworth Town Hall, with half a dozen Council officers, the inspector, CJAG and the Battersea Society and a couple of people in the audience.

*may be appropriate for tall building and this did not extend to all 'areas with good public transport accessibility'."*

An in 2010, the site of Peabody estate was not in the town centre.

The first version of the Site Specific Allocation Document (SSAD-Preferred Option) in 27<sup>th</sup> November 2009, related to Peabody Estate, St Johns Hill, SW11, said:

*"Tall buildings: In accordance with Council's Stage 2 Urban Design Study – Tall Buildings, applications for buildings of 5 or more storeys will be subject to the criteria of the tall buildings policy contained in the emerging DMPD. In accordance with Core Strategy policy IS3d, tall buildings in this location are likely to be **inappropriate**."*

Peabody criticised the wording and wrote on 05/02/10:

*"Peabody is concerned that the final sentence under the heading 'Tall Buildings' contradicts the analysis referred to above by stating: 'In accordance with Core Strategy policy IS3(d), tall buildings in this location are likely to be inappropriate.'"*

Following this comment, the Council decided to move the Town Centre boundaries to include part of Peabody's site. The SSAD adopted version says (p120):

Tall buildings: In accordance with Council's Stage 2 Urban Design Study – Tall Buildings, applications for buildings of 5 or more storeys will be subject to the criteria of the tall buildings policy contained in DMPD Policy DMS4. **The part of the site within the town centre is identified as being sensitive** to tall buildings, whilst on the southern part of the site adjacent to Wandsworth Common they are likely to be **inappropriate**, in accordance with Core Strategy Policy IS3d

You will appreciate that the previous part that we highlighted in bold, stating that tall building in this location are likely to be inappropriate has been removed and replaced with only a mention of the southern part of the site, the remaining becoming only "sensitive".

We consider the boundary change in the DMPD to be an attempt to justify the inclusion of part of the estate in the "sensitive but not inappropriate to tall building" area for town centres for *the developer's needs*, rather than for the promotion of the St John's Hill frontage or for the benefit of the community generally.

This is actually acknowledged in by the Council in DMPD Proposed submission page 145 saying:

*"This change is proposed in order to promote active town centre uses along the St John's Hill frontage, and to encourage regeneration of the Peabody Estate."*

The Council should never change rules with the aim of benefitting developers. Therefore the Committee must concede that this ‘last minute’ change of policy should not be considered appropriate to judge on the merit of Peabody’s proposal and that the whole site should still be considered as inappropriate for tall buildings

In conclusion therefore, there is overwhelming opposition within the community to the scale, density and impact of the proposed re-development. The 300 objections received by Wandsworth Council bear witness to this fact. The Council has a duty to take these objections into account and consider this to be the predominant case for rejection of the current proposals. “Tall buildings” are only defined in context to those that surround it, and hundreds of people have written to the Council within the past few years to say that Clapham Junction is inappropriate for tall buildings. They are out of context with existing buildings and they do not serve the needs of the local community.

## 2. Community Impact

Many letters of objection focus on the detrimental impact on community that the development would bring.

### Density

*“The development should be reduced in scale; it should be a lot less dense in order to avoid overstretching of resources and services. There will be huge pressure on traffic, parking, services and schools.”<sup>28</sup>*

With 60% more flats and 25% increase in the size of each flat, the population of the Peabody estate will very likely double. Currently some parts of the estate are empty as Peabody is only re-letting on short tenancy terms in order to facilitate redevelopment.

We have compiled the figures available in the table below:

	Existing	Proposal
<b>Flat number (+60%)</b>	353	527
<b>Size of each flat (+25%)</b>	1 bed-flat: 40sqm 2 bed-flat: 55sqm 3 bed-flat: 70sqm	1 bed-flat: 50sqm 2 bed-flat: 70sqm 3 bed-flat: 95sqm

Such greater housing density ensures there will be a considerable increase in traffic around the estate, generated by residents, visitors, and service vehicles. In addition it will create more stress on already stretched schools, doctors, local services, and of course refuse collection.

Commenting on the current congestion at the station in the morning, a resident said:

<sup>28</sup> Email from Jane E Clifton to the Planning Officer dated 17<sup>th</sup> May 2012

*“I invite you to walk the payments of St John’s Road around peak hour and to try to catch a morning peak hour train from Clapham Junction station to Waterloo – it will be abundantly evident to you that the existing infrastructure is already under severe pressure.”<sup>29</sup>*

Aside from its architectural excesses, the whole scale of the project needs to be reconsidered.

### Schools

We haven’t seen any concern by Peabody on the impact of the proposed scheme. It seems that Peabody base their case on an apparently un-researched assumption that there is plenty of capacity in local schools. In fact the issue of school places (particularly at reception and secondary school level) is of extreme concern to local people. The best schools are heavily over-subscribed and each year many families are forced to take private school places because of the lack of state provision. It is notable that the area around Clapham Junction probably has more private schools than anywhere else in the country (at least 9 within a 1 mile radius).

Although there has been recent improvements with the agreement to open a new secondary school in the old Bolingbroke building, and an annex to Belleville’s primary school located in Forthbridge Street (but already so over-subscribed that the local children living beside that new school are not allowed to join!), the debate on Belleville’s extension showed again the need for good schools in the area.

In the present economic climate, the pressure on state school places will inevitably rise still further. This is therefore an issue which should have received far greater attention in Peabody’s proposal.

### Affordable housing

	Existing	Proposal
<b>Flat number (+60%)</b>	353	527
<b>Social and affordable housing (-30%)</b>	100% social rent <i>[temporary measure of 128 classified under short term tenancy]</i>	53% affordable rent (including 11% intermediate).

However Peabody provided documents showing that there are currently only 225 social rent units and 128 private market units. These figures are totally misleading.

As we were told in January 2010 by Claire Bennie<sup>30</sup> (Peabody Trust), Peabody decided some years ago to lease some of the flats on a short term basis, so they could be emptied and used to relocate tenants during the different phases of the project. The

<sup>29</sup> Letter from Philip Le Pelley to the Planning Officer dated 22<sup>nd</sup> May 2012

<sup>30</sup> See on our website: <http://cjag.org/2010/01/27/meeting-with-peabody-trust/>

change to short term tenancies is only a temporary device to assist decanting and so this cannot be treated as a permanent change.

Thus Peabody is under-stating the reduction in the number of social housing units, from 353 to 221 - a loss of 132 social units which would appear to go completely against present policy.

This point is also clearly highlighted by the Wandsworth Society explaining:

*“We acknowledge that a further 11% (58) will be sold under a shared-equity scheme but this kind of affordable accommodation does not replace the existing social housing numbers. Even including the shared-equity element it is still a loss of 74 affordable homes.”<sup>31</sup>*

This is ironic to remember here that the purpose of Peabody is to provide social and affordable housing! As one tenant of Peabody put:

*“This is in complete contrast to its philanthropist founder, George Peabody, whose maxim was ‘to provide housing of a decent quality for the working people of London.’<sup>32</sup>*

### **3. Loss of Amenity**

#### Site entrance

The proposed vehicle entrance for this is in Comyn Road. As stated by many local residents, only someone not familiar with Comyn Road could design a development with the main entrance on Comyn Road. Although Peabody received many comments from the residents living around the estate, they chose to ignore them.

Comyn Road is notorious for its lack of easy navigability. The two-way Comyn / Eckstein / Severus complex, with its narrow streets and three right angle corners, is already highly problematic for drivers. All residents will be familiar with the gridlock that can develop and ensuing chaos when so few as three or four cars are travelling on Comyn and Eckstein Roads at the same time. This was why it was chosen as one of the filming locations for the first ever television documentary about “road rage”. Yet Peabody thinks it is an ideal environment on which to introduce hundreds of additional traffic movements every day. Are local residents not right to be alarmed?

As a resident crudely wrote in his objection:

*“To locate a primary entrance/exit to the project in Comyn Road is unacceptable to me and many of my fellow residents. The developer has been made aware of this from the outset. The developers chose to dismiss/ignore our opposition to this proposal. Why the existing entrance in Boutflower road has*

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<sup>31</sup> Letter from the Wandsworth Society to the Planning Officer dated 6<sup>th</sup> July 2012

<sup>32</sup> Letter from O Regan, Peabody Estate to the Planning Officer dated 21<sup>st</sup> May 2012

*been eliminated is stupid beyond belief. It demonstrates a complete disregard for resident's opinion and a singular arrogance to our opposition to this specific proposal.*<sup>33</sup>

Peabody argued that an entrance on Boutflower Road/Bolingbroke Grove was not providing safe entry and exit for all users and significant highway work would be required. However this is contradicted by their own documentation stating a traffic flow increase on the local highway of less than 3% to be compared with the detrimental impact on Comyn Road with a massive increase in traffic onto a narrow residential road.

Peabody wants the main vehicle entrance (leading to the underground car park) in Comyn Road – because, with an entrance/exit already “downhill”, it will not need to dig the underground car park nearly as deep as it would with a Bolingbroke or Boutflower entrance. Peabody will save vast amounts of money and, once more, chose to ignore all the objections and explanations of local residents.

### Parking

There will be a modest underground car park on the redeveloped site. Peabody base their parking proposals on the assumptions that restrictions on local street parking ‘will ensure’ that visitors do not use residential bays. How? The majority of local parking allows for visitors to ‘pay and display’ on meters for up to two hours. Parking in these streets is already extremely restricted with both residents and visitors finding it difficult to park. Furthermore, the restrictions are lifted at 6.30pm, generating large numbers of people parking in the locality to visit friends or the restaurants and bars on St John’s Hill and Northcote Road. Visitors to the new shopping centre and flats would add to this already heavy burden.

Peabody states that no local street resident parking permits will be issued to Peabody residents. With a Comyn entrance, that will do nothing to keep Peabody drivers off the tricky Comyn/Eckstein/Severus streets. It will also do nothing to keep their cars, and their visitors’ cars, from being parked on Comyn/Eckstein/Severus after 6.30pm and on Sundays. Again, are local residents not right to be alarmed?

Plenty are:

*“The pressure on adjacent roads and facilities would be huge. Traffic and parking are already problematic in the streets around the estate, while other services and amenities have not been put in place with such a major additional burden in mind.”*<sup>34</sup>

*“Yes, like any of us I’m sure the residents will use public transport, but most will also have cars as do the current Peabody’s residents. Even if they are not granted permits to use the surrounding streets to park, they will still be able to use them*

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<sup>33</sup> Email from James Robert-Poulain to the Planning Officer dated 17<sup>th</sup> April 2012

<sup>34</sup> Email from Ros Edwards to the Planning Officer dated 18<sup>th</sup> May 2012

*outside permit hours (ie evenings and Sundays). It is already very hard for local residents to find parking spaces due to shop (in fact we avoid using our car for fear we won't be able to find a parking space for it on our return), but with additional people seeking parking it will be near impossible. Also the new residents will undoubtedly have friends/family visiting also seeking parking”<sup>35</sup>*

Peabody also claims that they will make car club schemes available. However, there have been car clubs on Barnard Road (opposite Comyn Road) for some time, yet there has been no noticeable reduction of on-street parking. Hence to assume that a huge proportion of residents will automatically switch to this means of transport is not right, and certainly no justification in providing such a low parking ratio for a population of possibly 1000 tenants.

#### Increase of Traffic

Peabody commissioned Capita Symonds to undertake a Transport Impact Study. The result is a fine example of using statistics to mislead. It is flawed on 2 counts.

Firstly, the vehicle counts were very low when the survey took place (perhaps during a holiday period in June 2011 and/or when temporary road closures caused by engineering work around Lavender Hill were eliminating the rat-run effect). See Appendix 2 for a survey undertaken by Comyn Road residents in March 2012, which shows figures 74% higher than those in the Capita Symonds report, despite the fact that the survey was done during Easter school holidays.

Secondly, in its sweeping statement that traffic from the development would “*not have a discernable (sic) impact upon the operation of the local highway network*”. This is what Peabody wanted to be told, but it is plainly risible. Anyone with any experience of local road conditions would realise that introducing an extra 19 vehicles per hour would have an impact that was, to say the very least, extremely discernible.

Local residents have undertaken their own vehicle survey which shows the scale of the already existing problem. You will find the Motor Vehicle Movements in Comyn Road at the end of this document in the Addendum section (Comyn Road Residents' Response to Capita Symonds Transport Impact D-016C 2 April 2012).

Last but not least, the addition of “street cars”, while welcome, will also increase the number of car movements per car within the vicinity.

#### **4. Disruption and Planning Blight**

##### Construction access

Comyn Road is grotesquely misconceived as the sole entrance to the completed underground car park and wholly unfit as a potential conduit for contractors' vehicles during construction. Comyn Road is notorious locally and with black cab drivers as

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<sup>35</sup> Email from Natalie Duffy to the Planning Officer dated 21<sup>st</sup> May 2012



being an area of congestion. It has even featured on a documentary as a road-rage hotspot!

The increased car traffic will be bad enough once redevelopment is complete, but for the entire (alleged) six year construction period local residents will also have to endure a daily a non-stop cavalcade of contractors' vehicles going in and out of the site. Cranes, trucks, JCBs, cement mixers, you name it. It is insupportable that any of these often giant vehicles should use an entrance/exit on narrow Comyn Road.

#### Demolition/Construction Traffic

For the reasons set out above, it is imperative that no vehicles connected with the demolition and construction on the site be routed via Comyn /Eckstein/Severus Roads. Occasionally, a heavy vehicle has to manoeuvre in these narrow streets, either to make a delivery/removal or (usually an error that is not repeated) to access St John's Road. Chaos inevitably ensues. The streets are barely wide enough for such vehicles to drive in a straight line, let alone negotiate junctions and the 'Comyn Road Bend'.

It is also worth taking into account that Transport for London recommend Comyn Road as a quiet alternative route for cyclists: many cyclists use the road, and bicycles and construction traffic do not mix.

We understand that a 'Construction Management Plan' would be drawn up with the involvement of local residents. The way Peabody's consultation was conducted cannot make us optimistic on the outcome of such exercise.

#### Phasing of the Scheme

While we appreciate that this is a major demolition/construction project, it does not seem reasonable for Peabody to schedule it across a minimum of 6 years. Experience would suggest that this is likely to slip into an even longer time frame: 7, 8 or even 10 years? The level of disruption, atmospheric and noise pollution caused by the work, however well managed, will blight the entire neighbourhood, particularly for residents. This is inevitable, but the Council should take all steps to limit the length of time for which this will continue. Judging by other major construction projects around the country, it seems reasonable to expect all the work to be completed within a much quicker period (n.b. The Shard has now topped out after 3 years).

### **5. Environmental and Heritage Impact**

#### Loss of Trees

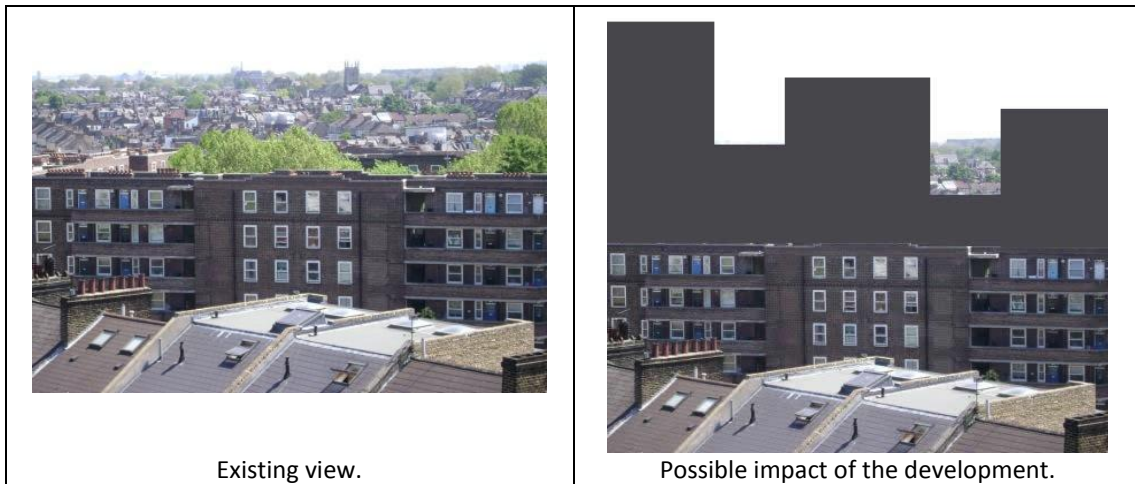
Although the Estate cannot be called aesthetically pleasing, it is its airy and there is sufficient light and space for residents to walk around and for children to play. **There will be green areas for each building in the new proposals, but open space is reduced.**

Out of the current 50 mature trees, Peabody plan to retain only 5, located at the entrances of the new layout of the estate (and only because the council officers told them it will not be acceptable to remove all of them!). 71 new trees should replace them with a noticeable smaller size, all of them confined to the estate. This will make a huge difference as currently some of the trees are actually taller than the current buildings.

A resident put:

*“The present green area of the estate, a sizeable common square with its beautiful trees will be destroyed. The trees ought to be protected. I thought the plan was to plant trees for the Queen’s Jubilee – not to destroy them. That beautiful little square is home to numerous birds, squirrels and a couple of ducks that return year upon year. The open spaces of the estates are available to all residents and are accessed via large inviting archways.”<sup>36</sup>*

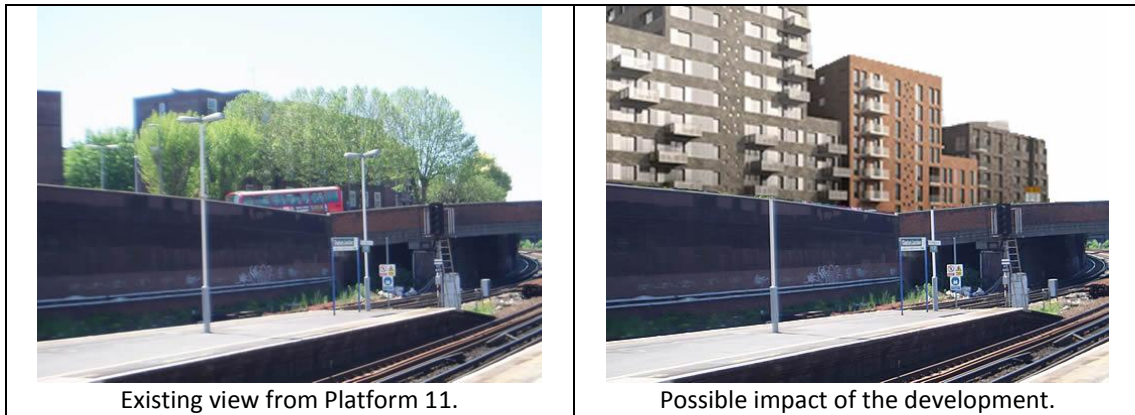
The proposed scheme will hide views with the size of the towers as shown in the montage below.



Both Comyn Road and St Johns Hill Road will lose the existing trees on the respective side of the road. This is particularly striking when you compare the existing view on St Johns Hill (from Clapham Junction station’s platform) where the trees are to be replaced by the high-rise façades.

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<sup>36</sup> Email from Chantal Walters to the Planning Officer dated 18<sup>th</sup> May 2012



Last but not least, the open space in the central will be very much hard landscaping. A few raised beds with lavender in them may look pretty on drawings but they could soon get tired-looking and full of debris.

The Lodge and the Cottage

The history of the site is worth some consideration. From open common land, to use for a Victorian charity school, and then as a site for one of the famous Peabody social housing projects, the land has always been used for public benefit. The only tangible historical assets that the site can retain when redeveloped are these two small buildings.



Peabody advocates that they are not listed buildings and therefore are not worth any consideration. They are not obviously of great architectural merit but certainly worth retaining for heritage reasons. PPG HE9.6 states:

*“There are many heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance... The absence of designation for such heritage assets does not indicate lower significance.”*

The Victorian Society strongly objects to the demolition of the two building and say:

*“These buildings are the sole survivors and last reminders of the Royal Masonic School which stood on the site from 1853 until 1934. These associations give the buildings notable historical significance.”<sup>37</sup>*

It is noticeable the Peabody decided to preserve that part of history while building the estate in the 1930s. Given their architectural and historic significance they are undoubtedly heritage assets and should be treated as such.

They are both very small and on the periphery of the development site. It is surely not beyond the scope of the scheme to retain them for residential, or community use.

### Loss of daylight

The Daylight and Sunlight Report carried out by GSA that all losses were acceptable. However the report shows regular loss of daylight of 40% (Eckstein road) and 50 to 60% for some properties in Comyn Road.

*“We do not have the option of moving out whilst the development is carried out, and at the end of the process, according to Peabody’s Daylight analysis, our sunlight will be decreased by up to 67.6%. This is totally unacceptable.”<sup>38</sup>*

As another local resident put:

*“There is adequate space within the development to set back the 4 storey block by between 3 and 5 meters, which would presumably go a long way towards eliminating this loss of light. True, this would cause a consequential loss of open space within the development, but I see no reason why some compromises should not be made to minimise the derogation of neighbouring properties.”<sup>39</sup>*

It is preposterous to attempt to deny that a plan including several tall towers and a massive density increase on the estate would not have any significant impact on the neighbourhood.

## **Conclusion**

*“Please be firm, say no to high-rise buildings and make a commitment to retain the Clapham Junction area as one of low-rise houses and apartments.”<sup>40</sup>*

Although we acknowledge and support the idea of improving the current site, we believe that the Council has a duty to reject Peabody’s proposal for all of the reasons stated above. The community has again spoken in numbers, and their views deserve to be recognised.

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<sup>37</sup> Letter James Hughes, Conservation adviser for the Victorian Society to the Planning Officer dated 18<sup>th</sup> April 2012

<sup>38</sup> Letter from Jacqueline Bowers to the Planning Officer dated 1<sup>st</sup> May 2012

<sup>39</sup> Letter from Simon and Olivia Ford to the Planning Officer dated 5<sup>th</sup> May 2012

<sup>40</sup> Letter from Jacqueline Bowers to the Planning Officer dated 1<sup>st</sup> May 2012

Therefore we consider that the Council should not approve the scheme and planning permission should be refused on the grounds that: -

1. The size of the buildings will have a detrimental impact on the vicinity. In the immediate past many, many residents have expressed objections to high rise and massive buildings in Clapham Junction.
2. With this redevelopment the number of social housing units available on the new estate will actually be cut by 133.
3. The density of the development will create problems in terms of road traffic, parking and local services in an area already under pressure. The location of the vehicle entrance is unsustainable.
4. The consultation process has been at best flawed, at worst dismissive of local opinion.

## Addendum

### 1. Motor Vehicle Movements in Comyn Road

#### *Comyn Road Residents' Response to Capita Symonds Transport Impact D-016C 2 April 2012*

The following data were gathered manually, for all motor vehicles moving eastbound (down) or westbound (up) past 47/49 Comyn Road. Please note that many schools were closed for Easter holidays during this week, which would have significantly reduced the number of vehicle movements, particularly during the 0800-0900 period.

#### **Tuesday 26 March 2012**

	Eastbound	Westbound
08.00-08.15	5	23
08.16-08.30	9	24
08.31-08.45	4	21
08.46-09.00	6	14
Hour Total	24	82

#### **Wednesday 27 March 2012**

	Eastbound	Westbound
17.00-17.15	12	17
17.16-17.30	5	15
17.31-17.45	20	20
17.46-18.00	9	15
Hour Total	46	67

#### **Thursday 28 March**

	Eastbound	Westbound
07.00-07.15	4	9
07.16-07.30	5	15
07.31-07.45	8	19
07.46-08.00	6	13
Hour Total	23	56

	Eastbound	Westbound
08.00-08.15	6	20
08.16-08.30	6	18
08.31-08.45	7	16
08.46-09.00	9	20
Hour Total	28	74

Regarding the Capita Symonds Transport Impact survey, we would like to make the following points:

1. Much is made of the 'Change in Peak Hour Movements' between that traffic currently entering or exiting the existing estate and the anticipated extra construction traffic. This seems of little relevance to conditions in surrounding streets, as what really matters is the overall traffic numbers – so it is Table 4 which is key.

2. The figures in Table 4 looked low to us (we are only too aware of just how busy this road is, especially during commute times) so we undertook our own surveys: see attached. You will note that these yielded figures that were significantly higher than Capita Symond's, and this during a relatively quiet week in Easter school holidays. The maximum 2-way hourly flow was 113: 74% higher than their survey.

3. We wonder when in June 2011 these surveys were taken? During the Spring Bank Holiday period? Or was it when several local roads (e.g. Beauchamp, Ilminster) were closed for road improvements, which deterred 'rat-runners'?

4. During the demolition and construction phases, it is reasonable to expect a further increase in rat-running along Comyn Road, as drivers seek to avoid inevitable hold-ups along St John's Hill 5. We would like to see the anticipated extra vehicle movements for all other hours of the day. When will they begin, and how much early-morning noise nuisance would this be likely to cause?

6. The Capita Symonds conclusion appears to be based on the fact that construction traffic will only increase traffic flows within existing levels of variance between days. How is this relevant? If this can be paraphrased by saying “there are quiet days, and there are busier days, and the extra construction traffic will be no more than the difference between the two extremes”, it seems to be a leap of faith to conclude that, therefore, the increase will not cause problems. 7. Even putting aside the higher figures in our survey, we feel it displays a complete ignorance of local conditions to state that 19 vehicles (mainly HGV?) driving up and down Comyn Road between 5 and 6PM will “not have a discernable (sic) impact upon the operation of the local highway network”. This is utter nonsense: we can guarantee that, if Comyn Road were to be used for this traffic, the result would be traffic chaos.