

The planning group of the Herne Hill Society wish to object to this application:

1. The Ministry of Housing, Communities and Local Government make it clear on their website that modifications to an existing permission that are “fundamental or substantial” require a new full planning application. A “VOC” application, as the current application has been designated, applies to “non-material amendments” or “minor material amendments”. The proposals in this application, which include a substantial increase in the number of units achieved through increase in the number of storeys with lowering of some floor heights, do not, in our view, constitute non-material or minor material amendments. Thus the form of the application is procedurally defective and should be rejected without further consideration of the merits. However, we also set out below our view as to the merits.
2. The consented planning application 20/01822/EIAFUL had involved pre-application discussion of a larger proposed development. The PAC report (6.2) contains the following: “The proposal at this stage was larger than the current proposal as it consisted of 224 residential units and 281sqm of commercial floorspace with building heights up to 15 storeys. The panel raised concerns of issues symptomatic of overdevelopment, including daylight access, single aspect units, and lack of play space. They also raised concerns of the visual impact of the proposal from Brockwell Park and, being taller than the Guinness Trust Estate, that it would stand out rather than blending into the townscape. The Panel also raised concern with the heights along Shakespeare Road”.

Given that 20/01822/EIAFUL was only given consent after rejection of a larger development (including 15 storeys), it cannot now be right, without cogent evidence to justify it, to seek to return to what had been rejected. There is no evidence to justify it. 11 storeys for the tallest block is bad enough in this location (and one reason why we objected to the original application), 15 storeys is clearly worse (even with some small reduction of floor heights). It would be almost twice the height of the nearest “tall” building in the vicinity, Kerin House, on the opposite side of the railway, and obviously vastly taller than the two- and occasionally three-storey houses that provide the predominant character of the immediate neighbourhood.

3. As to any proposed reduction of floor heights this seems to us an undesirable retrograde step, when the dimensions of so many new dwellings are already pared down to the minimum acceptable standard.
4. The applicant will point to tall buildings in the wider area, in particular those at Higgs Yard and now proposed at Hardess Yard, and the Guinness Trust Estate. These are considerably further away from the central area of Herne Hill, which has, apart from the two 1960s tower blocks on Dulwich Road, preserved a distinct identity without the introduction of tall buildings of the scale proposed in this case. We are particularly concerned about the effect of increased height on views from Brockwell Park (a Conservation Area), within the Poet’s Corner Conservation Area, and of course on the amenity of those living closest to the proposed development especially on Shakespeare Road, Mayall Road and Milkwood Road.
5. We are concerned that an increase of 60 units is not accompanied by any commensurate increase in shared open space between the blocks.

6. We are concerned by the admission, in the Internal Daylight and Sunlight Report, that not all the minimum standards are met. It is not clear to us on what basis this is justified. If it is sought to be justified on the basis that lower standards can apply for “inner urban” sites where denser and higher developments are now common, we submit that is wrong. Herne Hill does not have the character of an inner urban area.
7. We are also concerned about the results of this proposal affecting neighbouring properties (ES Addendum, vol.1, ch.10 report). The conclusion is that the adverse effects, which it is admitted will occur, will be greater than before. It is not enough, which this application seems to us to do, to shrug this off as not adding much more to the loss of amenity that the consented application already creates. On the contrary, the proposal should do everything to avoid any exacerbation of that loss.
8. For these reasons we submit that the changes to the consented application are not consistent with Lambeth Local Plan policies Q2 (amenity), Q5 (local distinctiveness), Q22 (conservation areas) and Q25 (protected views) and permission should therefore be refused.

The Herne Hill Society

6 August 2025