



Loughborough Junction Action Group  
 25 Loughborough Park  
 London SW9 8TP  
 020 7733 1744  
 07799 621 582  
[ljactiongroup@gmail.com](mailto:ljactiongroup@gmail.com)

Lambeth Planning,  
 (Development Management)  
 PO Box 734,  
 Winchester,  
 SO23 5DG

*2<sup>nd</sup> Feb 2021*

Ref: 20/04417/LDCP

For attention of: Miss Lauren Shallcross [Lshawcross@lambeth.gov.uk](mailto:Lshawcross@lambeth.gov.uk)

**Application for a Certificate of Lawful Development (Proposed) with respect to installation of a permanent shaft and two tunnel adits, along with the installation of a permanent headhouse, new 400kV and 132kV GIS substations and 2x SGTs. | London Electricity 54 Bengeworth Road London SE5 9AJ**

Dear Miss Shallcross

Whilst Loughborough Junction Action Group had been made aware of the proposed tunnelling and the proposals to remove spoil over a number of years, and has reservations regarding this, to which we will comment first, our main concern covered secondly is the proposal for significant new sub stations which appear to be processed through the planning system with little prior consultation and undue haste.

Firstly we have concern regarding the increased vehicular traffic in local residential streets, and in particular along and across Cambria Road, where previous campaigning in connection with the enhancements to the Cambria Bridge as part of the 7Bridges project, created a pedestrian friendly route to give access to Ruskin Park. This route is a noted success and is also used by a significant number of school children to avoid the vehicular movements in Padfield Road and the narrow pavements of Herne Hill Road. Whilst we recognise there is some necessity to this, we are concerned regarding the timing of the movements and a lack of any mitigation measures to reduce emissions, control speed, and protect the public realm. The documents on the portal are not independent but commissioned by National Grid, and some such as the Road Safety assessment have only been uploaded to the website for less than 1 week. The

Ljag comments 02 02 21

documents read independently, just as they have been commissioned and do not provide the comfort and cohesive thoroughness to assess and address the impact in the way that an EIA would do.

Secondly, the proposal for new sub stations, does not acknowledge the impact on neighbouring heritage assets, including the Grade II listed houses in Southwell Road, which will appear dwarfed from Harbour Road, and the views from Ruskin Park which currently has a very powerful view over the city,

The lack of any detailed elevations or even a visual outline from the park compounds the lack of respect for the existing community that is prevalent through this application,

Whilst we recognise that there are permitted development rights for electricity companies, in urban locations. It is unclear whether they are appropriate in this instance. Where development is surrounded by existing and established communities, built form, and landscape, there needs to be due consideration given to the scale and appearance as part of the place making of that community. This does not seem to have been undertaken, no opportunity appears to have been taken to look at whether the mass of the proposed sub stations can be minimised by partially placing them in a basement, altering their footprint, or by how their form could enhance the biodiversity of the area through substantial planting and green roofs for example. There is no reason that they could not be agreeable neighbours, yet the current plans give no assurances with their utilitarian form and ill-considered bulk and excessive height. There are plenty of examples where sub stations have become either attractive features or have been integrated successfully into the townscape.

We trust this application will be viewed in the context of the impact it will have on the community and how this can best be delivered to ensure the impact is respectful. It is clear the community is now engaged with the issues and LJAG would like to offer our assistance to support Lambeth in consultation.

Yours Sincerely

Tim Gaymer

LJAG Trustee