



13 October 2023

WE NEED YOUR HELP!

We are going to challenge the approval of the Woodlands development.

Dear Neighbour,

We need your help to challenge the Woodlands conditional planning permission given by the [Lambeth Planning Application Committee on 27 June 2023](#). Our objective is to secure an intervention with the aim of securing a more proportionate and balanced redevelopment where the public benefits exceed the harms.

Current situation

We believe the 126-unit development is an over densification of the constrained 0.54 hectare back land site with insufficient affordable housing (just 20 units) on former public (NHS) land. The over densification and poor design inflict issues not only internal for the site's new residents but also external harms to the existing residents, environment, heritage assets (including the Grand Designs/Grade II listed Water Tower) and conservation areas (including Renfrew and Walcot). Sample image shots after completion of the proposed development are below:



We believe that there are strong reasons for the planning application to be “called-in” or refused by the London Mayor who is due to rule on the planning permission via a “Stage 2” review by him and his GLA Planning team. We are also seeking for an intervention by the

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Secretary of State for Levelling Up, Housing and Communities (Mr Michael Gove) who can issue a holding directive to withhold full planning permission while the matter is “called in” for his department’s review.

Florence Eshalomi the MP for Vauxhall (which includes the Woodlands redevelopment site) has written to the London Mayor to call in the planning application and to overturn Lambeth Council’s permission decision on the grounds of:

- a) Lack of affordable housing provision
- b) Daylight, sunlight, and shadowing impacts
- c) Unjustifiable harm to heritage assets and Conservation Areas

The STB team has already written to both the London Mayor/GLA and the Secretary of State setting out our concerns and the issues for everyone (new and existing) living in urban areas which we believe are at stake and will set a precedence if this development in its current form goes ahead.

You can find a summary of the key issues we have identified on our website here at <https://stoptheblocks.org/key-issues> and they are also on pages 5-6.

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We need your help!

In order to secure a “call-in” can you please spare a bit of time and no later than **Monday 16 October 2023** write with your views on the matter to:

1) The London Mayor/GLA

An amendable template (with email addresses) can be found [here](#) and at <https://stoptheblocks.org/email-mayor-of-london> and on page 7 which asks him to “call-in” the planning application or refuse the planning permission.

2) The Secretary of State for Levelling Up, Housing and Communities (Mr Michael Gove).

An amendable template (with email addresses) can be found [here](#) and at <https://stoptheblocks.org/email-mayor-of-london> and on page 8 asking him to “call-in” the planning application and request a review.

We would recommend you include in your email’s:

1. Any of the key issues (pages 4-5) which we have identified and which you agree with in your own words.
2. A summary of your own concerns and issues with the development and its approval.

We know many of you have already written to Lambeth on this issue many, many times before Whatever you may have sent to Lambeth Planning previously and that they have published on their website will be sent to the GLA Planning unit when Lambeth refer the application to them.

However, we hope that if you agree with the key issues we have identified and matters which you want to flag which you feel are important you can spare the time to write to both of the decision makers.

We need you to **act now and please write ASAP** as we need your backing.

Of course, we are happy to assist in any way and answer any questions you may have. Our thanks to those who have already been in contact and have written to both parties.

Thank you as always to everyone for your generous time, effort, and support.

Kind regards

Your team at Stop the Blocks Community Action Group



KEY ISSUES

WHY THE CONDITIONAL PLANNING PERMISSION SHOULD BE REFUSED OR "CALLED IN" FOR FURTHER CONSIDERATION

Stop the Blocks Community Action Group has spent some time analysing the Lambeth Planning Committee's (LPC) direction to approve conditional planning permission on 27 June 2023 for the Woodlands development (Dugard Way, Kennington, SE11 4TH).

We believe that there are several key grounds and issues as to why the conditional planning permission should be refused or halted for further consideration. The reasons why development proposal should be refused at a regional level (London Plan policy level), by the Mayor (including the GLA Planning Team) are also relevant for consideration and an intervention by the Secretary of State for Levelling Up, Housing and Communities (Mr Michael Gove). The issues extend beyond London regional matters due to the conflicts of the proposed development with the National Planning Policy Framework (NPPF).

The proposed development:

- 1) Is inconsistent with matters as prescribed in the NPPF in particular with policies for conserving and enhancing the historic environment (NPPF Chapter 16).
- 2) Could have significant effects beyond their immediate locality, in terms of the precedence it sets in terms of what is an acceptable development.
- 3) Raises significant architectural and urban design issues. Its design will impact at least seven existing heritage assets and two conservation areas. Its design will also negatively impact existing residential amenity in terms of daylight/sunlight below an adjusted BRE level, which are far below the BRE guidance.
- 4) Is inconsistent with the findings of the Inspector on a previous appeal for development of the site (Planning Inspectorate Appeal Ref: APP/N5660/W/20/3248960) . The Inspector identified that the site could have secured sufficient public benefits with a development of c90 units, compared to the proposed 126 units.

Lambeth Planning Committee's (LPC) direction to approve conditional planning permission was flawed and the proposal should be refused or "called in" because:

1. The Application proposes 24% affordable housing, significantly below the 50% threshold required for former public owned land and contrary to Policy H5 of the London Plan.
2. The provision of affordable housing and mix of housing by tenure is not consistent with development plan expectations.
3. When considering the application, the Council's planning committee members and the public were not provided with a current and up to date financial viability assessment with which to consider whether the provision of affordable housing was the maximum attainable or that the over densification of the site was justifiable in financial or planning terms.
4. Historic England and the GLA conclude the development will result in "some harm" and a "degree of harm" to a unique cluster of listed buildings in the immediate vicinity of the site.

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The harm to the heritage assets is not outweighed by the public benefits of the development, contrary to paragraph 202 of the National Planning Policy Framework (NPPF) and Lambeth Local Plan Policy HC1 (Heritage Conservation and Growth).

5. In determining the application, three members of the Planning Committee appear to have unlawfully taken costs, risks, and reputational harm into account as material planning considerations to approve the application contrary to *R (Miles) v Tonbridge & Malling BC et al.* [2020] WHC 1608 (Admin).

6. The bulk, scale and mass of the application will not preserve or enhance the prevailing local character contrary to Lambeth Local Plan Policy Q7 (Urban Design: New Development).

7. The application will result in a significant decrease in daylight and sunlight to adjoining properties contrary to Lambeth Local Plan Policy Q2 (Amenity) and below the amended BRE target set as a minimum at the site by the Appeal Inspector in his appeal decision. The deprivation of daylight, sunlight, and impact of overshadowing by the developments on existing residents far exceed the tolerances in existing BRE guidelines and now effectively establishes a benchmark to build dark depressive clusters across central and urban areas in London.

8. The application fails to provide adequate replacement trees contrary to Lambeth Local Plan Policy Q10 (Trees).

9. In addition to these matters, there are the following serious concerns about the application:

- a) The planning application and supporting documentation have several inconsistencies in them not allowing the application to be assessed accurately.
- b) The proposed tower block would be incongruous to its surrounding context. The proposed tower block is an over-scaled building and does not preserve or enhance the nearby listed buildings. The footprint and bulk of this application are still significantly large when compared with the refused appeal scheme.
- c) The site has substantial issues with its servicing arrangements due to poor access, parking provision, and inadequate delivery and service plan.

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TEMPLATE EMAILS

For your convenience we have provided template emails with the respective recipient's email addresses for both the London Mayor and the Secretary of State.

We respectfully and strongly encourage you to put the matters of concern in your own words and include information on the issues which are pertinent to you. The Mayor of London will be particularly interested in matters that are pertinent to development in the London-wide region.

If you have sent information before to Lambeth Planning which they published on their website they say it will be sent by Lambeth Planning to the GLA Planning Team when they refer the conditional planning permission to them for their "Stage 2" consideration. Therefore, you do not need to resend it to the GLA unless you wish to.

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Action Step 1 of 2: Please send your email to the London Mayor/GLA:

To: planningsupport@london.gov.uk

CC: Copy to GLA Assembly Member Marina Ahmad and the GLA Case Officer (James Cummins)

marina.ahmad@london.gov.uk; James.Cummins@london.gov.uk

Subject: Woodlands and Masters House (Kennington) -PLEASE REFUSE the Redevelopment

Application: Redevelopment of the former Woodlands and Masters House site

GLA Application Reference: 2021/1201/S1

LB Lambeth reference: 21/04356/FUL

Local Planning Authority: Lambeth Borough Council

Site: Woodlands Nursing Home, 1 Dugard Way, Kennington

Dear Mr Khan,

I am writing to you regarding the decision by Lambeth Borough Council (the **Council**) to resolve the grant conditional planning permission for the development of the former Woodlands Nursing Home referenced above.

Whilst I am supportive of a sympathetic redevelopment of the Site, the proposed development fails to respect the character of the area and fails to deliver the public benefits, which are capable of being achieved on the Site.

The Application is an application of potential strategic importance for the purposes of the Town and Country Planning (Mayor of London) Order 2008 due to the height of the residential tower exceeding 30 metres. I request that you exercise your power under Article 6 of the Town and Country Planning (Mayor of London) Order 2008 to direct refusal of the Application for the following reasons:

<Please include the points you wish to make and please include your name and your postcode>

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Action Step 2 of 2: The Secretary of State for Levelling Up, Housing and Communities (Mr Michael Gove) :

To: PCU@levellingup.gov.uk

CC: Copy to MP's Florence Eshalomi and Neil Coyle:
Ministerial.Correspondence@levellingup.gov.uk
florence.eshalomi.mp@parliament.uk
neil.coyle.mp@parliament.uk

Subject: Woodlands Nursing Home-Request for Planning Application to be Called In for Determination by the Secretary of State

Application: Redevelopment of the former Woodlands and Masters House site

GLA Application Reference: 2021/1201/S1

LB Lambeth reference: 21/04356/FUL

Local Planning Authority: Lambeth Borough Council

Site: Woodlands Nursing Home, 1 Dugard Way, Kennington

Dear Michael Gove,

I am writing to you regarding the decision by Lambeth Borough Council (the **Council**) to resolve the grant conditional planning permission for the development of the former Woodlands Nursing Home referenced above.

I kindly request that you exercise your power under Section 77 of the Town and Country Planning Act 1990 so that the above application Ref: 21/04356/FUL should be referred to you as Secretary of State for determination.

I request that you "call-in" this application for determination and that a public inquiry is held to examine the proposed scheme, and whether the public benefits of the proposal are sufficient to outweigh the harm to heritage assets and public amenity.

Please find explained below the grounds as to why I believe the matter respectfully necessitates for you to call-in this application.

<Please include the points you wish to make. You can use the key issues we have suggested (if you agree with them) but please put them into your own words and please include your name and your postcode>