



ANTHOLOGY  
KENNINGTON STAGE

Built from London

Planning Statement

June 2019

**tp bennett**

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## Introduction

1.1 This Planning Statement is submitted in support of a Planning Application made on behalf of Anthology Ltd (the “Applicant”) for the redevelopment of the site known as the Woodlands and Masters House for a mixed use residential development and associated landscaping and servicing.

1.2 The proposed development will bring back into use an underused brownfield site while securing the future use of a major cultural asset, and acting as a regeneration catalyst for the surrounding area. The redevelopment will substantially improve the urban grain, creating new routes through the area, attracting footfall through an existing vacant site whilst creating safer streets for pedestrians and cyclists with better connections. It will act as a landmark for the existing Cinema Museum. In this context, the proposed development will contribute to and meet key planning policy considerations, achieving a development that is economically, socially and environmentally sustainable.

1.3 This Statement assesses the proposal against the relevant planning policies in the London Borough of Lambeth’s Development Plan and other material considerations relevant to the determination of the application. The Statement is structured as follows:

- Section 2 – provides an overview of the application proposal
- Section 3 – describes the site and surrounding area
- Section 4 – provides details of the site history
- Section 5 – provides an overview of the principal planning policy and guidance relevant to the assessment of the proposed development
- Section 6 – provides an assessment of the proposal against the provisions of the Development Plan and other material considerations
- Section 7 – refers to potential planning obligations
- Section 8 – sets out the conclusions

## Overview and Proposed Development

2.1 The Woodlands and Masters application site currently comprises a former nursing home (C2), which is now vacant, and the Master’s House, a Grade II listed building; the remainder of the site is taken up by service roads and scrubland. The Master’s House is currently occupied by the Cinema Museum. There are two locally listed lodges, which frame the entrance gates into the site from Renfrew Road.



2.2 Woodlands nursing home was purpose built as a 30-bed nursing home for people over the age of 65 with mental health problems; the use ceased in 2013, due to a decline in referrals, and the built form now comprises a vacant two/ three-storey building with associated parking. While vacant, the building (s) are currently looked after by a security firm to prevent squatting.



2.3 The proposed development has been subject of a number of formal pre application meetings with both London Borough of Lambeth (LBL) and the GLA, and there has been a programme of public consultation comprising both public meetings and targeted individual meetings in residents' homes, where specific issues were raised that could benefit from a more detailed discussion.

2.4 The proposed development comprises:

*Redevelopment of the former Woodlands and Masters House site retaining the Masters House and associated ancillary buildings; demolition of the former care home; the erection of a single tall building of 29 storeys and peripheral lower*

*development of 3/4 storeys, to provide 258 residential units, together with servicing, disabled parking, cycle parking, landscaping, new public realm, a new vehicular and pedestrian access, and associated works.*

2.5 This will optimise the existing brownfield site to provide high quality residential accommodation and associated amenity space and have the following headline public benefits:

- Regenerating and optimising a large, highly accessible brownfield site in central London for mixed-use development, integrating it into the surrounding neighbourhood;
- 258 new homes, 50% of which would be for affordable housing;
- Securing the future of the Grade 11 Cinema Museum;
- Substantially enhancing the setting of the listed buildings;
- High-quality architecture, with buildings ranging in height between 29 storeys and a 3/4 peripheral block, in keeping with local and strategic views;
- Significant improvements to the urban grain and improvement to key street frontages;
- Providing enhanced wayfinding across the Elephant and Castle;
- Creation of new pedestrian and cycle routes and better local connections;
- Creation of safe streets for pedestrians and cyclists;
- Approximately £2,000,000 (index linked) contribution towards Mayoral and Lambeth CIL;
- jobs and apprenticeships during the construction and operational phases of the proposed development;

2.6 The application comprises the following documents:

- Design and Access Statement
- Affordable housing financial viability assessment
- Air quality assessment
- Arboricultural and Biodiversity.
- Archaeological assessment
- CIL Forms
- Construction management/logistics plan
- Daylight and Sunlight assessment
- Energy assessment
- Flood Risk Assessment
- SUDS
- Heritage statement
- Landscaping strategy.
- Contamination Assessment
- Lighting assessment
- Noise impact assessment
- Marketing (contained with Planning Statement).

- Planning obligations Head of Terms
- Planning statement
- Refuse and recycling strategy
- Servicing and delivery management plan
- Statement of public consultation
- Sustainability Statement
- Transport assessment
- HTVIA
- Travel plan

## Site and Surrounding Area

### Site

3.1.1 The site comprises 0.7 ha to the east and north of Renfrew Road and Dugard Way (which forms part of the site). To the west is George Mathers Road and to the south is Castlebrook Close. Castlebrook Close is a cul de sac comprising two storey terraced housing, and Renfrew Road comprises three storey 1960s terraces, where it sits adjacent to the site, but is fundamentally mixed in character with a range of heights and building typologies. Dugard Way forms an access to the site from Renfrew Road, while pedestrian access comes via George Mathers Close. The application site essentially comprises the remaining part of the much larger former hospital site (the rest of which has been developed piecemeal over time) and this is reflected both in the site's internal layout and its relationship with the surrounding urban grain. The Woodlands nursing home, and associated parking takes up the entire north of the site, this was constructed in approx. 1995 and this part of the site has no architectural or urban relationship with the Cinema Museum (Masters House) to the south. At present this north part of the site primarily consists of servicing and the single/ two storey building of no merit. This sits ill with the Master's House (Cinema Museum), the Grade II listed building, the former administrative block and chapel to Lambeth Workhouse. This building, which later became part of Lambeth Hospital is covered by the following Listing:

*Of special interest for the architectural quality of the exterior, whose principal elevations are virtually intact and highly ornate for a workhouse building of the time, especially so for London; \* The chapel has special interest for its decorative treatment, which echoes that of the façade, and its unusual and elaborate roof; \* Of rarity value in London as the principal building of a Victorian metropolitan workhouse, of which only few examples survive; \* Historic interest as one of the earliest metropolitan workhouses to be rebuilt following the Metropolitan Poor Act (1867); \* Historic interest for the Charlie Chaplin association, and the Doulton connection; \* Group value with the water tower, and the courthouse and fire station in Renfrew Road (qv), altogether a good ensemble of Victorian public/institutional buildings.*

3.1.2 The Master's House, then, is currently occupied by the Cinema Museum and this southern portion of the site forms part of the Renfrew Road Conservation Area (CA41), the character of which is derived, in addition to the Cinema Museum, from the collection of

buildings formed by the former Fire Station, Court House, and Court Tavern fronting on to Renfrew Road, and the Water Tower (also Grade II listed). The gate piers to Dugard Way and the North and South Porters' lodges and reception buildings framing the gates off Renfrew Road are locally listed, although Historic England notes:

*The lodges and former receiving wards to either side of the entrance to the site are not of special interest.*

3.1.3 As above, Woodlands was purpose built as a 30-bed nursing home for people over the age of 65 with mental health problems; this use ceased in 2013, due to a decline in referrals and it comprises a vacant two-storey building with associated parking area. It is currently looked after by a security firm to prevent squatting. These buildings are of no architectural quality and combined with the car park and Dugard Way detract from the setting of the listed building, and as part of the setting of the conservation area have no discernible merit.

3.1.4 The properties in the Castlebrook Close cul de sac adjoin the nursing home side on, with the termination point of the cul de sac facing the site. To the east, the site curtilage extends respectively to the boundary with Dante Road and the Bellway development at George Mathers Close. To the west, the rear gardens of the properties in Renfrew Road back onto Dugard Way as it enters the site.

3.1.5 The site is accessed by vehicular traffic from Renfrew Road onto Dugard Way. To the west pedestrian only access is provided through a series of pathways including via George Mathers Road, which also provides vehicular access to the Bellway Homes development. There is no northern or north eastern access or egress to the site.

3.1.6 To the east is the listed water tower, which has recently been extended and converted to a single-family dwelling house.

3.1.7 The borough boundary with Southwark runs in part directly adjacent to the east of the site, and in part through the adjacent Bellway development.

## **Surrounding Area**

3.2.1 It is axiomatic that the 'character' of an area is not determined by the 'character' of a single street in any direction; by definition the term 'area' encompassing a broader and less easily definable geographic space. For the purpose of this exercise placing exact boundaries on what comprises a definable area is both unhelpful and unrealistic, however the London Plan does define character areas as follows:

- central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.
- urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes





3.2.6 Kennington and the Elephant and Castle have been subject of substantial change over the recent past changing the nature of the surrounding area substantially, and this is examined below.

## Planning History

4.1.1 There is limited planning history on the application site; however, the following is of relevance:

- 97/01751/FUL The Masters House, Dugard Way, Off Renfrew Road, Kennington London Conversion and change of use from hospital to a cinema museum, with ancillary car parking.

4.1.2 This consent had a condition limiting the use to a 'cinema museum' and for no other use, including those within the same use class.

### *Other relevant planning history*

4.1.3 08/00427/FUL Old Lambeth Hospital Site Dugard Way Off Renfrew Road London SE11 4TH Redevelopment of the site involving the construction of 7 residential blocks ranging from

2 - 5 storeys in height to provide 112 residential units an extension of the existing water tower to provide a 4 bed house and 22 car-parking spaces with access onto George Mathers Road.

4.1.4 14/00509/FUL | Demolition of raised podium deck, existing day nursery, management office and associated structures. Redevelopment of the site involving the creation of a replacement day nursery and external play area (Use Class D1) along with provision of 89 residential units (Use Class C3) in buildings ranging from 1 to 16 storeys in height; public realm improvements; parking and servicing space; creation of new vehicular and pedestrian accesses; and associated works. | Nursery School 10 Lollard Street London SE11 6UP

## **Cross Borough Emerging Character**

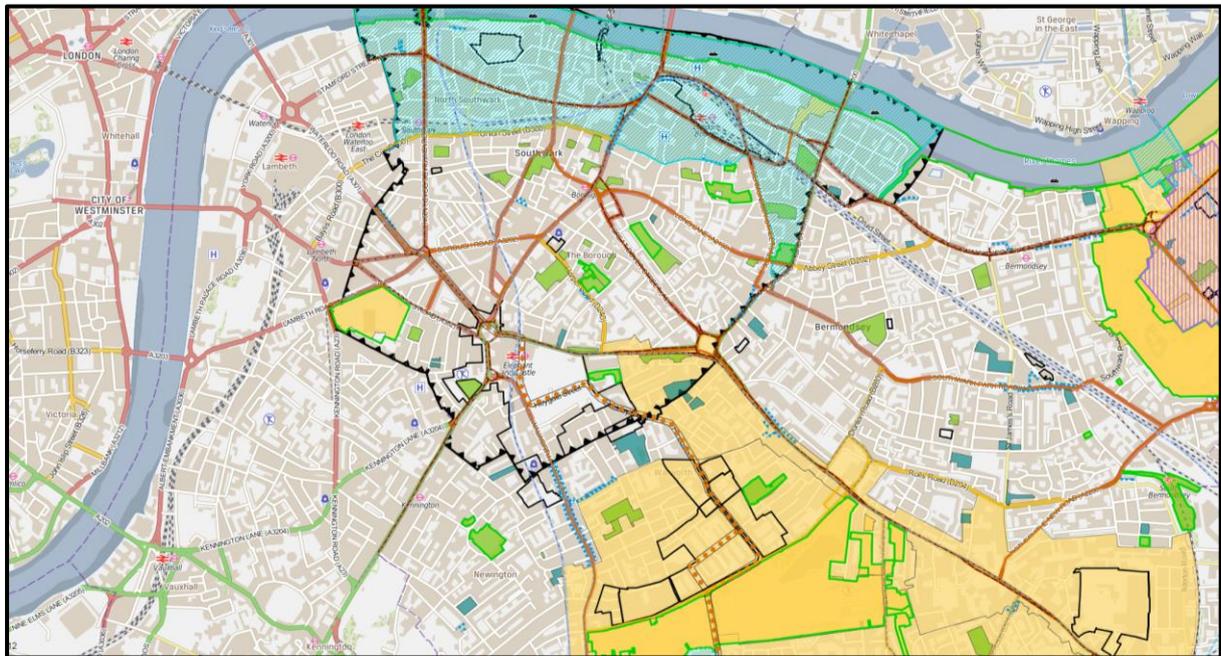
- 16/AP/4458 Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures (undecided)
- 13/AP/3450 5-9 ROCKINGHAM STREET, LONDON, SE1 6PD Demolition of existing buildings and redevelopment of site to provide a 13 storey building with 30 residential units (comprising 9 x 1 bed, 17 x 2 bed and 4 x 3 bed units) and 373m<sup>2</sup> restaurant (A3 use) at part basement/part ground floor level and mezzanine storage with the provision of 2 disabled car parking spaces and associated refuse and cycle storage
- 12/AP/1092 Outline application for: Demolition of all existing structures and bridges and redevelopment to provide a mixed use development comprising a number of buildings ranging between 3.95m (AOD) and 104.8m (AOD) in height with capacity for between 2,300 (min) and 2,462 (max) residential units together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works.
- 12/AP2239 Redevelopment to provide a 37 storey building (maximum building height 127m AOD) and 4 storey pavilion building (maximum building height 20.5m AOD), comprising 284 residential units, 809 sq.m flexible ground floor retail / financial and professional services / restaurant uses (Use Classes A1-A3) and 413 sq.m commercial (Use Class B1) use, basement car parking, cycle parking, vehicular access from Brook Drive, servicing and plant areas, landscaping and public realm improvements and associated works. The application is accompanied by an Environmental Statement submitted under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 201

- 07/AP/0760 | Erection of buildings comprising 1 building of up to 44 storeys (145.5 metres AOD) and a terrace of up to 7 storeys in height to provide 470 residential flats (Class C3), theatre (Class D2) and cafe (Class A3) uses and a pavilion building for retail/marketing suite purposes (Class A1/ Sui Generis) with associated public open space, landscaping, underground car parking for 30 cars and servicing space. | SITE OF THE FORMER LONDON PARK HOTEL, 80 NEWINGTON BUTTS, LONDON, SE1 4QU
- Heygate Estate Non-material amendment to outline planning permission ref 12/AP/1092 (for redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 2,300 (min) and 2,469 (max) residential units together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works) to make the following changes to the parameter plans and development specification for plots H11A and H11B (which form MP4): Plot H11A Increase maximum GEA by 3,834sqm. Amend the maximum plot component extent for the mid-rise blocks Block A (by a 1.3m extension) and Block B (by a 2.4m extension) to enable 4 balcony projection towards the courtyard. Plot H11B Reduce the maximum GEA by 3,834sqm Amend the permitted uses at ground floor to include Classes A1-A5 and B1. Amend the maximum plot component height for Block B (mid-rise block) increasing the maximum AOD from 40.45m to 42.55m to accommodate the lift-overrun on the Heygate Street frontage
- Newington Causeway Redevelopment of the site for a mixed use development comprising a basement/mezzanine basement, ground plus twenty-three floors to accommodate a 140 room hotel (levels 1-11), 48 residential units (levels 12-24), a retail unit (at ground floor), associated cycle parking, servicing and refuse and recycling, landscaping and private and communal residential amenity space (including at roof top level), external refurbishment to the front of the railway arches, and a new pedestrian route through the site linking Newington Causeway with Tiverton Street
- E&C Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 34 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures.
- Skipton House Demolition of the existing buildings and creation of 2 levels of basement (plus mezzanines) and the erection of buildings ranging from Ground Floor plus 7 to ground floor plus 39 stories (maximum building height of 146.3m AOD) comprising retail uses (Use Classes A1/A3/A4) at ground floor, multifunctional cultural space (Use Classes D1/D2/Sui Generis) and flexible retail/fitness space (Uses Classes

A1/A3/A4 & D2) below ground, and office use (Use Class B1) and 421 residential units (Use Class C3) on upper levels, new landscaping and public realm, a publically accessible roof garden, ancillary servicing and plant, cycle parking and associated works. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) 2011

### Commentary on relevance of the above decisions

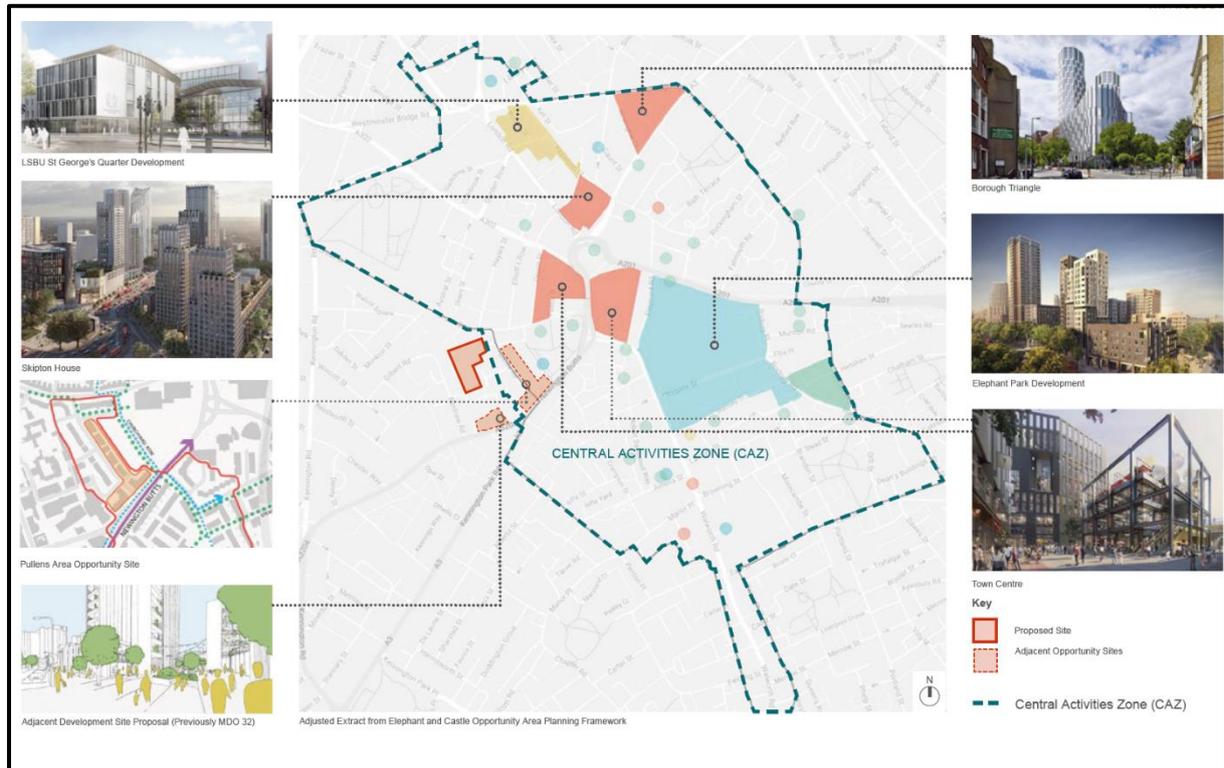
4.3.1 The proposed development site sits outside of, but on the boundary with, the Elephant and Castle OAPF, the CAZ, and London Borough of Southwark (a single boundary covers all three). While this places it within Lambeth and with Kennington, it is a particularly sensitive site for the purposes of planning policy and for the purpose of political administration, sitting as it does geographically congruent with the planning decisions in the CAZ/ OAPF, but administratively outside them. This could have the potential to result in an inconsistent approach to planning decisions, with the boundary acting as a cliff edge for development, with no relevant context for the urban environment on the ground. This makes the role of the GLA as strategic body in co-ordinating such sites particularly important.



4.3.2 The Elephant and Castle OAPF area, promoted through policy, has been subject of a substantial amount of high density development. While this site sits outside of the boundary and administrative framework of the OAPF, the characteristics remain largely identical. The site itself has a PTAL of 6A/ 6B, is within 50 m of the Elephant and Castle Major Centre and shares the locational characteristics of the OAPF. In this context the planning permissions in the immediate surrounding area, but outside of London Borough of Lambeth, provide the urban and larger strategic context in which the site should be seen to avoid uncoordinated decision making and to conform with good strategic planning principles.

4.3.3 This is further complicated by the fact that there is a number of policy designations on the Southwark border that comprise future development sites in the area. The entire area is, then, liminal in nature and undergoing rapid change, and the character is therefore difficult

to define within a snapshot; however, it is uncontestedly ‘central’ combining a range of heights, footprints and typologies.



4.3.4 The essential policy positions, however, remain consistent in both Kennington and Elephant and Castle, a policy environment in which optimising density is encouraged on appropriate accessible urban sites.

4.3.5 While there are few recent immediate developments in Lambeth the mixed nature is acknowledged in the Lambeth Tall Buildings Study (2014) which states:

*Existing large and tall building development is relatively common in Lambeth but generally clustered in the north of the borough (north of the South Circular road). There is a combination of stand-alone blocks and clusters.*

4.3.6 Of the more recent development in Lambeth, 14/00509/FUL “Demolition of raised podium deck, existing day nursery, management office and associated structures. Redevelopment of the site involving the creation of a replacement day nursery and external play area (Use Class D1) along with provision of 89 residential units (Use Class C3) in buildings ranging from 1 to 16 storeys in height; public realm improvements; parking and servicing space; creation of new vehicular and pedestrian accesses; and associated works” provides some context, in that a high density development was justified on the basis of the site being accessible and with the definition of ‘central’ as established in the London Plan.

### Pre Application Discussions

4.4.1 Pre-application discussions specific to the application site began in February 2018 with both LBL and the GLA. These initial meetings were positive, and as a result the process was taken forward and subsequently supplemented with a programme of topic meetings with LBL

on height, views, landscaping, viability, design, housing and transport. Pre-application consultation and negotiation has also included a series of formal discussions with officers at the Greater London Authority (GLA), Transport for London (TfL), as well as extensive public consultation. The GLA formal pre app reports are included in Appendix x.

4.4.2 The extensive pre-application consultation has informed the proposals for which planning permission is now sought. Design changes have been introduced to address comments raised throughout the pre-application consultation process. These changes are described in detail within the Design and Access Statements and Statement of Community Involvement (SCI), which accompany the Applications.

4.4.3 In summary, the Applicant has met with LBL to discuss a series of revisions of the scheme, specifically around height, layout, landscaping, viability. The Council have been supportive of principle of redevelopment of the site for housing, and the retention of the Cinema Museum, while looking to interrogate further issues around height and massing. These have been subject of considerable discussion and while further scrutiny and discussion is expected many have been now been resolved, and further advice has been given to ensure policy compliance. There are outstanding discussions around the height of the proposed development, however the principle of a point building with lower peripheral development has been accepted at officer level, as has the methodology by which any such building might be assessed. This application will address these issues directly.

4.4.4 The applicant has also had four meetings with the GLA, including a separate meeting with the GLA heritage advisor; these have been supportive of a tall building on the site, subject to detailed design and other policy considerations. For the GLA the retention of the Cinema Museum has been flagged as key issue, along with affordable housing provision and ensuring good connections through the site. A separate meeting with TfL has also been carried out held.

## **Public Consultation**

4.5.1 An extensive public consultation programme has been carried out, including three drop in sessions at the Cinema Museum, and a separate Statement of Community Involvement produced by BECG is submitted with this application.

4.5.2 The Applicant hosted three separate public consultations at The Cinema Museum. The first event was used primarily to better understand how local stakeholders viewed their area and how this may translate into priorities for the redevelopment of the site (no designs were presented). The two subsequent public exhibitions then sought to gain feedback on the iterative design process. From the outset, the Applicant made it clear that there were three main priorities:

1. Deliver 50% on-site affordable housing;
2. Retain the Cinema Museum on-site in Masters House; and
3. Improve the pedestrian links throughout the area.

4.5.3 Crucially, all events gave attendees the opportunity to provide feedback on the proposals and to speak to members of the project team.

4.5.4 Over the course of the three events there have been several recurring themes visible in the feedback received. It is evident that residents support the retention of The Cinema Museum and the Applicant's commitment to facilitate this.

4.5.5 Additionally, there was clear support for 50% affordable housing to be delivered on site. Towards the latter stages of the consultation the Applicant has received feedback which has suggested that the tenure split of the affordable housing should include more homes for affordable rent. However, design constraints influencing the height and reducing potential overlooking from Block A (the block allocated for properties for affordable rent) has dictated that additional affordable rented accommodation would be difficult to incorporate.

4.5.6 Generally, residents have responded positively to increasing public accessibility and pedestrian links in and around the site and the potential of opening up a through-route between Dugard Way and Dante Road. The Applicant had originally intended to remove the hard boundary between the site and Water Tower development as well as Castlebrook Close. However, upon further engagement with both sets of residents they were concerned about the impact this would have on the enjoyment of their residential amenity. To respond to these concerns the Applicant therefore agreed to retain a hard boundary treatment between their site and the Water Tower and no longer propose a pedestrian link to Castlebrook Close.

4.5.7 It is fair to say that the commentary around height has been prevalent throughout each stage of the consultation. From the outset residents specified that they would prefer a low-rise solution on the site as a first preference. The applicant sought to address this by first modelling a low-rise solution comprised of Mansion Blocks. However, architecturally this is not the Applicant's preferred design solution as a 'Mansion Block' approach would have a greater impact on the levels of daylight/sunlight enjoyed by neighbouring residents and within the development site, reduce the amount of ground floor public realm and have a greater impact on privacy/overlooking to existing neighbours.

4.5.8 It has been suggested throughout the consultation that the Applicant should look to deliver a vastly reduced number of new homes on the site in order to deliver a low-rise design solution. However, in order for the applicant to be able to viably deliver 50% affordable housing and be compliant with current planning policy in terms of optimising well-connected sites to deliver more housing – a significant reduction in the number of units is not possible.

4.5.9 However, the Applicant has sought to respond to concerns, by residents and the council, about height where possible by reducing Block B from 34-storeys to 29-storeys and the height of Block A from six storeys to three storeys, with a setback fourth storey positioned away from the rear of the neighbouring properties on Renfrew Road.

- Meet & Greet – The first session occurred on 19<sup>th</sup> and 20<sup>th</sup> July 2018 from 12pm till 4pm and 4pm till 8pm respectively and was attended by 111 people. At this early stage in the Applicant's consultation, residents were given the chance to comment on the principles of the scheme and how they would like to see the proposals progress. The key findings from the 26 feedback forms received were as follows: Strong affinity toward The Cinema Museum, concerns about height of new buildings in the area, public accessibility and number of affordable homes could be improved. Similarly,

with feedback from post it notes, The Cinema Museum, height and public accessibility were the issues raised most by the Meet & Greet attendees.

- **Exhibition 1** – The next public consultation was held on 17<sup>th</sup> and 18<sup>th</sup> October from 12pm till 4pm and 4pm till 8pm respectively and was attended by 118 people. At this event, the Applicant showcased some development options and explained the rationale behind their preferred choice. Of the 31 feedback forms returned 83% supported the retention of The Cinema Museum with 0% opposing, 43% support the redevelopment of the site to provide new homes for the local area with 25% feeling neutral toward this statement. Additionally, 55% support the delivery of circa 50% affordable housing with almost 24% expressing a neutral response to this proposal. When asked for additional comments, residents raised appropriate height, affordable housing and The Cinema Museum as priorities.
- **Exhibition 2** – The final consultation was event was held on 2<sup>nd</sup> and 3<sup>rd</sup> April October from 4pm till 8pm and 12pm till 4pm respectively and was attended by 135 people. Attendees were shown more detailed plans for the site and had a final opportunity to provide comments and feedback. Residents reaffirmed many of the comments at the previous events. For instance, support for The Cinema Museum continued along with the Applicant’s commitment to deliver 50% affordable housing on a vacant/brownfield site. Concerns continued regarding height relating to both buildings and the impact this has on the privacy of residents.

*Engagement with local elected representatives*

4.5.10 The Applicant sought engagement from all relevant stakeholders from LBL, shown in the table below, and held meetings with Princes ward councillor, Cllr Jon Davies, Cabinet Member for Housing, Cllr Paul Gadsby and Leader of the Council, Cllr Lib Peck. All other Lambeth political stakeholders did not take up the Applicant’s offer for a private meeting.

4.5.11 Given that the site sits along the boundary of the London Borough of Southwark, the Applicant felt it was appropriate to engage with a number of political stakeholders within the neighbouring borough, as shown in the table below. Of these that were contacted, none sought a meeting with the Applicant.

Lambeth Political Stakeholders	Southwark Political Stakeholders
Cllr Lib Peck - Leader of the Council	Cllr Maria Linforth-Hall - St George's Ward LB Southwark
Cllr Jack Hopkins - Deputy Leader	Cllr Graham Neale - St George's Ward LB Southwark
Cllr Jo Simpson - Princes Ward + Vice-Chair of Planning	Cllr James Coldwell - Newington Ward LB Southwark
Cllr David Amos - Princes Ward	Cllr Eleanor Kerslake - Newington Ward LB Southwark
Cllr Jon Davies - Princes Ward	Cllr Alice Macdonald Newington Ward LB Southwark
Cllr Matthew Bennett - Cabinet Member for Planning, Investment, New Homes	Florence Eshalomi - AM for Lambeth and Southwark

Cllr Paul Gadsby - Cabinet Member for Housing	Neil Coyle - MP for Bermondsey and Old Southwark
Kate Hoey - MP for Vauxhall	

*Engagement with Community Groups*

4.5.12 As a result of the scale of the scheme, the Applicant pursued private meetings with all of the community groups shown in the table below. Only the Walworth Society requested a presentation and Q&A session to discuss the proposals and the Applicant presented to their membership. The Applicant also held meetings with the Renfrew Road Residents’ Association and the Water Tower Residents’ Association.

Engaged Community Groups
Elephant and Castle Partnership
Kennington Association
Kennington Park Estate Residents
Kennington, Oval and Vauxhall Forum
Stop the Blocks
The Friends of Kennington Park
The Vauxhall Society
The Walworth Society
Vauxhall One (BID)
VGERTA
Waterloo Action Centre
We are Waterloo/Waterloo Community Development Group (BID)

4.5.13 Throughout the progression of the proposals, local action group, Stop the Blocks group, was formed. The Applicant participated in their public meeting on 8<sup>th</sup> April 2019 to answer questions from the local community.

*Engagement with Residents Associations*

4.5.14 From the early stages of the consultation period, the applicant has invited nearby Residents’ Associations to a private meeting so they can receive feedback from the surrounding community on their proposals. The Applicant held two meetings with both the Renfrew Road and the Water Tower Development Residents’ Associations and also modified the plans in order to directly respond to their comments and concerns.

*Response*

4.5.15 There have been several issues that have been consistently raised at all of the public consultation events. These include preservation of The Cinema Museum, height, affordable housing and pedestrian access. Some of these issues have been addressed by the applicant from the beginning of the consultation process, including retaining The Cinema Museum on site, delivering 50% affordable housing and increasing public accessibility. However, a preference for lower rise buildings (as opposed to a tower) was referenced by some attendees as their preferred design solution. In response, a low-rise development (6 / 7 storeys) was

drawn and tested by the Applicant but it became clear that this solution had a notably greater adverse impact on both neighbouring properties and within the development site. These adverse impacts included daylight, sunlight and overshadowing as well as impact on privacy and overlooking.

4.5.16 A full table of responses is included in the SCI.

## **Planning Policy Context**

### **Introduction**

5.1.1 Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise in accordance with Section 38(6) of the Planning & Compulsory Purchase Act 2004.

5.1.2 The statutory development plan comprises the London Borough of Lambeth Local Plan (2015), Lambeth Council Proposals Map and the London Plan (2016). The Lambeth Local Plan is currently under review, and the Draft Revised Local Plan was put out to consultation in late 2019, with a proposed adoption date of Quarter two, 2021. The Draft New London Plan (Minor Suggested Changes) is currently undergoing its EIP. While this is technically of limited weight, as the first London Plan reflecting the current Mayor's policies, the GLA will place considerable importance on its implementation.

5.1.3 Other policy documents that are material planning considerations in the determination of this application includes: the National Planning Policy Framework 2018 (NPPF), National Planning Policy Guidance (NPPG), the London Plan Supplementary Planning Guidance (SPG), and the London Borough of Lambeth Supplementary Planning Documents (SPD).

5.1.4 The planning policy relevant to the consideration of the application therefore comprises three levels of policy – national, regional and local. The three tiers of policy are introduced within this chapter and a detailed assessment of the proposed development against the relevant policy is provided in Section 6.

### **National Policy**

5.2.1 The National Planning Policy Framework (NPPF) sets out the Government's economic, environmental, and social planning policies; it identifies that the purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF advises that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development. The NPPF encourages engagement in pre-application discussions, consultation and generally front-loading the planning application process. It also sets out that in determining planning applications, local planning authorities should apply the presumption in favour of sustainable development.

5.2.2 The NPPF has not changed the statutory status of the development plan as the starting point for decision making; however, it constitutes guidance for local planning authorities and decision-makers both in drawing up plans and is a material consideration in determining applications (NPPF paragraph 196).

5.2.3 Local planning authorities may give weight to relevant policies in emerging plans according to: a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given)

5.2.4 At the heart of the NPPF is a presumption in favour of sustainable development (para 11). Development proposals that accord with an up-to-date development plan should be approved without delay and applications for housing should be considered in the context of that presumption. Planning decisions should promote an effective use of land in meeting the need for homes, while safeguarding and improving the environment and ensuring safe and healthy living conditions (para 117).

5.2.5 Substantial weight is given to the value of using suitable brownfield land for homes (para 118). The NPPF promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing. For example, it supports opportunities to use the airspace above existing residential premises for new homes and encourages decision takers to allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene (para 118 c) to e)). There is particular emphasis on bringing forward land previously in public ownership:

*Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.*

5.2.6 Further, Local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs...particularly in areas of high housing demand.

5.2.7 The NPPF states that planning decisions should support development that makes efficient use of land (para 122), taking into account:

- the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- local market conditions and viability;
- the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- the importance of securing well-designed, attractive and healthy places.

5.2.8 The NPPF places particular importance on planning policies and decisions avoiding homes being built at low densities, ensuring that developments make optimal use of the potential of each site (para 123).

*Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances: a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate; b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).*

5.2.9 Development should create pedestrian priority accessible places that are safe, secure and attractive and allow for the efficient delivery of goods, and access by service and emergency vehicles (para 110). Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (par 109).

5.2.10 The NPPF places great emphasis on achieving well-designed places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities (para 124). Design quality should be considered throughout the evolution and assessment of individual proposals (para 128). Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, though where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development (para 130).

5.2.11 Development proposals that have the potential to affect heritage assets should describe the significance of assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance (para 189). In determining applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness

5.2.12 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

5.2.13 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (para 196). When determining planning applications, local planning authorities should consider the desirability of new development in making a positive contribution to local character and distinctiveness (para 192 c)).

5.2.14 When determining planning applications for renewable and low carbon development, local planning authorities should a) not require applicants to demonstrate the overall need for renewable or low carbon energy and b) approve the application if its impacts are (or can be made) acceptable (para 154).

5.2.15 Planning policies and decisions should ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.2.16 Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely

with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot

5.2.17 The Government has also published National Planning Practice Guidance (NPPG) which provides further detailed guidance on matters outlined in the NPPF.

## **Regional Policy**

*The London Plan (as amended and consolidated 2016)*

5.3.1 The Mayor's London Plan (2016) provides the strategic policy context and spatial development strategy for London. Each London borough's Local Plan needs to conform with the London Plan.

5.3.2 London's increasing population, changing demographics and growing economy are among the key issues facing London; this has informed the Plan's policies. The Plan sets out the Mayor's Vision for London, which includes, as its headline point, planning for substantial population growth ensuring London has the homes, jobs, services, infrastructure and opportunities that a growing and ever more diverse population requires.

The Mayor plans to achieve this vision in ways that do not worsen quality of life for London as a whole, which means making the best use of land that is currently vacant or underused.

5.3.3 All of the policies in the Draft London Plan are of strategic importance; however the policies within the London Plan which are considered particularly relevant to the proposed development on the Site are:

- Policy 2.9 – Inner London
- Policy 3.1 – Ensuring equal life chances for all
- Policy 3.3 – Increasing Housing Supply
- Policy 3.4 – Optimising Housing Potential
- Policy 3.5 – Quality and Design of Housing Developments
- Policy 3.6 – Children and Young People's Play and Informal Recreation Facilities
- Policy 3.7 – Large Residential Developments
- Policy 3.8 – Housing Choice
- Policy 3.9 – Mixed and Balanced Communities
- Policy 3.10 – Definition of Affordable Housing
- Policy 3.11 – Affordable Housing Targets
- Policy 3.12 – Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- Policy 3.13 – Affordable Housing Thresholds
- Policy 3.16 – Protection and enhancement of social infrastructure
- Policy 5.1 – Climate Change Mitigation
- Policy 5.2 – Minimising Carbon Dioxide Emissions
- Policy 5.3 – Sustainable Design and Construction
- Policy 5.5 – Decentralised Energy in Development Proposals

- Policy 5.7 – Renewable Energy
- Policy 5.13 – Sustainable Drainage
- Policy 5.21 – Contaminated Land
- Policy 5.22 – Hazardous Substances and Installations
- Policy 6.3 – Assessing Effects of Development on Transport Capacity
- Policy 6.13 – Parking
- Policy 7.1 – Building London’s Neighbourhoods and Communities
- Policy 7.2 – An Inclusive Environment
- Policy 7.3 – Designing Out Crime
- Policy 7.4 – Local Character
- Policy 7.5 – Public Realm
- Policy 7.6 – Architecture

5.3.4 The Mayor has also published supplementary planning guidance and strategies which elaborate on London Plan Policy. Those most relevant in consideration of the proposals are:

- Mayor’s Draft London Housing Strategy (September 2017)
- Affordable Housing and Viability SPG (August 2017)
- Housing SPG (March 2016)
- Social Infrastructure (May 2015)
- Sustainable Design and Construction (April 2014)
- Accessible London – Achieving an Inclusive Environment (October 2014)
- Shaping Neighbourhoods: Character and Context (June 2014)
- Shaping Neighbourhoods: Play and Informal Recreation (September 2012)
- London View Management Framework (March 2012)
- Affordable Housing and Viability SPG (August 2017)

5.3.5 The Mayor of London adopted a new Affordable Housing and Viability Supplementary Planning Guidance (SPG) in August 2017.

5.3.6 The SPG includes a new Threshold Approach to viability, which makes provision for a Fast-Track Route for planning applications which are not required to submit a viability assessment. The Fast-Track Route applies to applications that meet a 35% threshold (on habitable rooms). Such applications will not have to submit a viability assessment or be subject to review mechanisms provided an agreed level of progress is made within agreed timescales following the grant of planning permission.

5.3.7 The criteria for the Fast-Track Route is that applications must: deliver at least 35 per cent affordable housing on-site without public subsidy; be consistent with the relevant local affordable housing tenure split and meet other obligations and requirements to the satisfaction of the local planning authority and the Mayor where relevant; and have sought to increase the level of affordable housing beyond 35 per cent by accessing grant.

5.3.8 For public land, the SPG states that land that is surplus to public sector requirements typically has a low value in its current use, allowing higher levels of affordable housing to be delivered. For these reasons the Mayor has an expectation that residential proposals on

public land should deliver at least 50 per cent affordable housing to benefit from the Fast Track Route.

## *Draft New London Plan*

5.3.9 In November 2018, the Greater London Authority published their Draft London Plan. The plan was consulted upon in 2018, with the Draft Minor Suggested Changes published in August 2018. This is currently going through its Examination in Public (EIP). As the Plan is in the comparatively early stages of its development, material weight is limited as to the policies within it; however, the GLA will wish to see it applied. For the purpose of the EIP the latest iteration includes the minor suggested changes and this is the version referred to throughout this document, unless otherwise indicated.

5.3.10 The Draft London Plan is underpinned by the concept of ‘good growth’: this concept – growth that is socially and economically inclusive and environmentally sustainable – ensures that it is focused on sustainable development.

*“Good Growth is about working to re-balance development in London towards more genuinely affordable homes for working Londoners to buy and rent. And it’s about delivering a more socially integrated and sustainable city, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities. Good Growth is not about supporting growth at any cost, which for too long has been the priority, leaving many Londoners feeling excluded and contributing to a lack of community cohesion and social integration.”*

5.3.11 There are six concepts underpinning good growth: Building strong and inclusive communities, making the best use of land, creating a healthy city, delivering the homes Londoners need, growing a good economy, increasing efficiency and resilience.

5.3.12 All of the policies in the Draft London Plan are of strategic importance; however the policies within the London Plan which are considered particularly relevant to the proposed development on the Site are:

- Policy GG1 Building strong and inclusive communities
- Policy GG2 Making the best use of land
- Policy GG3 Creating a healthy city
- Policy GG4 Delivering the homes Londoners need
- Policy GG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD10 Strategic and local regeneration
- Policy D1 London’s form and characteristics
- Policy D2 Delivering good design
- Policy D3 Inclusive design
- Policy D4 Housing quality and standards
- Policy D5 Accessible housing
- Policy D6 Optimising density

- Policy D7 Public realm
- Policy D8 Tall buildings
- Policy D11 Fire safety
- Policy D13 Noise
- Policy H1 Increasing housing supply
- Policy H5 Delivering affordable housing
- Policy H6 Threshold approach to applications
- Policy H7 Affordable housing tenure
- Policy H12 Housing size mix
- Policy S4 Play and informal recreation
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G5 Urban greening
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy infrastructure
- Policy SI4 Managing heat risk
- Policy SI5 Water infrastructure
- Policy SI12 Flood risk management
- Policy SI13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.1 Residential parking
- Policy T7 Freight and Deliveries, servicing and construction

5.3.13 Of particular significance in comparison to the adopted London Plan is the removal of the density matrix as a tool of assessment of residential schemes:

*Development must make the most efficient use of land and be designed at the optimum density. The processes required... "Delivering good design" set out how a design-led approach will inform the evaluation of a site's context and help to identify its capacity for growth. Particular consideration should be given to the following evaluation criteria to determine optimal development density:*

- 1) *the site context, including surrounding built form, uses and character;*
- 2) *the site's connectivity and accessibility by walking, and cycling, and existing and planned public transport to jobs and services (including both PTAL and access to local services);*

3) *the capacity of surrounding infrastructure.*

*The higher the density of a development, the greater the level of scrutiny that is required of its design. For residential development it is particularly important to scrutinise the qualitative aspects of the development (policy D6)*

5.3.14 This then replaces the more prescriptive density matrix with a design based approach firmly linked to accessibility, location and infrastructure capacity.

5.3.15 In this context the key factors in understanding the residential capacity of a site involve: 1) demographic make-up and socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure.

5.3.16 These should then be used to establish the most appropriate forms of development for an area in terms of scale, height, density, layout and land uses, with the specific aim of ensuring the most efficient use of land so that development on all sites is optimised. The emphasis is then on optimisation and encouraging such, and this is returned to later in this document.

## **Lambeth Local Plan**

5.4.1 Local planning policies are contained within Lambeth's Local Development Framework (LDF), which comprises the Lambeth Local Plan (2015), the Local Plan Policies Map (2015) and saved policies of the Unitary Development Plan (2010) and the Core Strategy (2011).

### *Lambeth Local Plan (2015)*

5.4.2 The Lambeth Local Plan is the overarching document of the LDF and sets out planning policies for Lambeth to guide growth in housing and jobs, infrastructure delivery, place shaping and the quality of the built environment over fifteen years from 2015 to 2030. The Local Plan replaced the Core Strategy (2011) but retains the spatial strategy, vision and strategic objectives of the borough. It focuses on the key issues to be addressed, and includes a delivery strategy for achieving these objectives. The main strategic objectives of the Local Plan are to accommodate economic and housing growth across the borough.

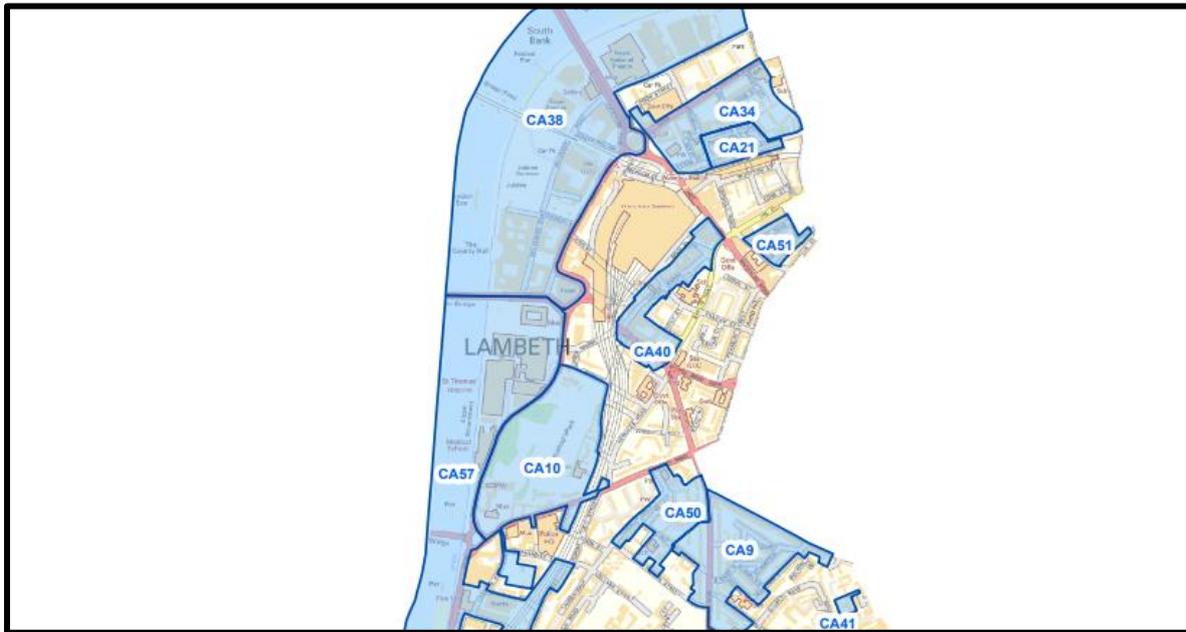
5.4.3 The Site is located in a number of key planning policy designations within the Local Plan for which there are Local Plan policies. These designations are an important part of the Site's context and have informed the proposed development.

5.4.4 These designations include:

- Conservation Areas, (Policy Q22)
- Views; (Policy Q25 Views)

## *Conservation Area*

5.4.5 The application site is partly in the Renfrew Road Conservation Area (CA41) although the main development area is outside of such. Other local conservation areas, Kennington Walcot and West Square are more distant from the application site.



## *Views*

5.4.6 The Site falls within, or on the border of, a number of local views.



## *Strategic Objectives*

5.4.7 The Local Plan sets out a number of strategic objectives to tackle spatial planning issues. Five relevant key themes are set out below and are considered particularly relevant to the proposals for the Site:

## *Strategic Objective A – Accommodating population growth*

5.4.8 This objective sets out LBL’s aim to increase the overall supply of housing by at least 17,925 additional dwellings, and increase the mix and quality of housing to address the need for all types of housing, including affordable housing and the needs of different groups in the community, as identified through LBL’s Strategic Housing Market Assessment (2011)

## *Strategic Objective C – Tackling and adapting to climate change*

5.4.9 This objective aims to mitigate climate change, and also adapt to its effects. Lambeth Council promotes the reduction of carbon emissions by minimising the need to travel and maximising energy efficiency, decentralised energy and renewable energy generation in buildings and area regeneration schemes. Also, safeguard and increase biodiversity through co-ordinated implementation of the Lambeth Biodiversity Action Plan and enable Lambeth to adapt to the effects of climate change, including drought and flood risk, through the design of the built environment, urban greening, and sustainable urban drainage.

## *Strategic Objective D – Providing essential infrastructure*

5.4.10 This objective recognises that essential infrastructure is needed in order to achieve future housing growth, economic development and environmental sustainability. Lambeth Council encourages essential physical, social and green infrastructure to support population and economic growth, essentially development in a highly sustainable locations that would promote travel by public transport, and would promote cycling and walking by the creation of new routes and the provision of cycle storage facilities. Lambeth Council also encourages contributions to the improvement of health and wellbeing by delivering new community facilities, and also encourages the reduction of waste through sustainable waste management contributing to the delivery of Lambeth Council’s Sustainable Waste Management Strategy.

## *Strategic Objective E - Promoting community cohesion and safe, liveable neighbourhoods*

5.4.11 Lambeth Council’s key priority is to maintain and develop safe, liveable neighbourhoods. Lambeth encourages the development of sustainable neighbourhoods with a high quality, liveable residential environments, respect for local amenity, good access to local services and transport, and mixed populations. New developments should provide a safe environment where crime is designed out.

## *Strategic Objective F – Creating and maintaining attractive, distinctive places*

5.4.12 This objective aims to create and sustain distinctive local places through excellent design of buildings and the public realm essentially valuing heritage, identity, cultural assets, conservation and enhancement of the historic environment, supporting regeneration, and developing Lambeth’s strength in arts and culture.

5.4.13 The key Local Plan policies which are considered particularly relevant to the proposals for the Site include:

- Policy D2 – Presumption in favour of sustainable development
- Policy D3 – Infrastructure

- Policy D4 – Planning obligations
- Policy H1 – Maximising Housing Growth
- Policy H2 – Delivering Affordable Housing
- Policy H4 – Housing Mix in New Developments
- Policy H5 – Housing standards
- Policy S2 – New or improved community premises
- Policy T6 – Assessing impacts of development on transport capacity
- Policy T1 – Sustainable Travel
- Policy T2 – Walking
- Policy T3 –Cycling
- Policy T4(d) – Public transport infrastructure
- Policy T6 – Assessing impacts of development on transport capacity
- Policy T7 – Parking
- Policy T8 – Servicing
- Policy EN1 – Open Space
- Policy EN3 – Decentralised Energy
- Policy EN4 – Sustainable Design and Construction
- Policy EN5 – Flood Risk
- Policy EN6 – Sustainable drainage systems and water management
- Policy Q1 – Inclusive Environments
- Policy Q2 – Amenity
- Policy Q3 – Community Safety
- Policy Q5 – Local Distinctiveness
- Policy Q6 – Urban Design: Public Realm
- Policy Q7 – Urban Design: New Development
- Policy Q8 – Design quality: construction detailing
- Policy Q9 – Landscaping
- Policy Q10 – Trees
- Policy Q12 – Refuse/recycling Storage
- Policy Q13 – Cycle Storage
- Policy Q15 – Boundary treatments
- Policy Q18 – Historic environment strategy
- Policy Q20 – Statutory listed buildings
- Policy Q22 – Conservation areas
- Policy Q23 – Undesignated heritage assets: local heritage list
- Policy Q25 - Views
- Policy Q26 – Tall Buildings
- Policy PN8 – Oval and Kennington

## *Lambeth Local Plan Review*

5.4.14 In October 2017, LBL began a full review of the Local Plan. Lambeth’s Updated Local Plan, together with the London Plan and Neighbourhood Plans, once adopted, would set out

the planning policies for development in the borough up to 2035. Initial consultation on the issues for the partial review occurred until December 2017 and the Revised Lambeth Local Plan Proposed Submission Version was published for consultation in late 2018, with a post consultation version to be published in late 2019. This is programmed for adoption in quarter 2/3 of 2020/ 21 and will run behind the Mayor of London's timetable for adoption of the London Plan, to ensure the updated policies are consistent.

5.4.15 Paragraph 48 of the NPPF states:

*Local planning authorities may give weight to relevant policies in emerging plans according to: a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given); b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)*

5.4.16 As the Lambeth Local Plan Review is at a comparatively early stage, little weight can be attached to the policy changes, particularly given its relationship with the Draft New London Plan, which is also unadopted. However, consideration will be given to the evidence base, where appropriate, and where relevant, the policy positions are picked up here.

#### *Additional Supplementary Planning Documents (SPD)*

5.4.17 In addition to the Development Plan, LBL have also published several relevant Supplementary Planning Documents (SPD's). Those most relevant in consideration of the proposals is:

- Lambeth Development Viability SPD (October 2017)

#### *Lambeth Development Viability SPD (October 2017)*

5.4.18 The Lambeth Development Viability SPD, adopted on 9 October 2017, sets out LBL's approach to assessing development viability in planning proposals. This states that policy requires the submission of a financial appraisal if the proposed affordable housing provision is below the applicable target level of provision (i.e. 50% where public subsidy is available or 40% without public subsidy) or where the proportions of social and affordable rented and intermediate housing are not in accordance with policy. Developers are then required to supply viability information where necessary to demonstrate that a scheme is maximising affordable housing. The SPD goes on to conform with the GLA position stating that viability appraisals will not be required for applications that meet the criteria for 'Fast Track route' as set out in the Affordable Housing and Viability SPG (GLA).

## Assessment of the Proposal

### Introduction

6.1.1 As outlined in Section 2, the application seeks planning permission for the following development:

*Redevelopment of the former Woodlands and Masters House site retaining the Masters House and associated ancillary buildings; demolition of the former care home; the erection of a single tall building of 29 storeys and peripheral lower development of 3/ 4 storeys, to provide 258 residential units, together with servicing, disabled parking, cycle parking, landscaping, new public realm, a new vehicular and pedestrian access, and associated works.*

6.1.2 This section of the Planning Statement assesses the proposal against the policies of the Development Plan and other material considerations as described in Section 5. The main issues to be addressed in respect of this application are:

- Principle of Development
- Loss of C2 Use
- Preservation of Cultural Use
- Housing
- Optimising Density
- Backland Development
- Tall Buildings
- Views
- Heritage
- Affordable Housing
- Dwelling Mix
- Design
- Residential Amenity
- Daylight and Sunlight
- Dual Aspect
- Landscaping
- Children's Play
- Balconies
- Highways and Transport
- Access and Servicing
- Energy and Sustainability
- Lighting
- Flood Risk
- SUDS
- Archaeology
- Contamination
- Biodiversity

- Air Quality
- Noise and Vibration
- Wind Modelling
- Construction Management

## Principle of Development

6.2.1 At a national level, the National Planning Policy Framework (NPPF 2018) promotes a presumption in favour of sustainable development, through the effective use of land driven by a plan-led system, to ensure the delivery of sustainable economic, social and environmental benefits. The NPPF promotes the efficient use of land with high density, mixed-use development and encourages the use of previously developed, vacant and underutilised sites to maximise development potential.

6.2.2 The NPPF (paras 118 & 122) seeks the optimal use of brownfield land in balance with housing need, viability, local character and infrastructure. Policy 3.4 of the London Plan (2015) provides guidelines for appropriate residential densities dependent on location and access to public transport links. Given the site's excellent transport links (PTAL Score of 6a), it is expected that a residential development should achieve between 140 and 405 u/ha.

6.2.3 The Draft London Plan takes an approach that high-density, mixed-use places that make the best use of land, should be prioritised in Opportunity Areas, on brownfield land, and sites which are well-connected by existing or planned tube and rail stations, sites within and on the edge of town centres, and small sites (i.e. the Opportunity Area designation is just one of a suite of criteria by which to assess priority, rather than the only criteria). It is incumbent on Local Authorities to proactively explore the potential to intensify the use of land, to support additional homes and workspaces, promote higher density development, particularly on sites that are well-connected by public transport, walking and cycling.

6.2.4 Policy GG2 of the Draft London Plan (2018) encourages development that is well connected and on brownfield sites to be intensified to promote higher density developments in well located areas. The proposed redevelopment would better utilise the current site and include a net uplift in habitable rooms that is very well situated in relation to local transport networks.

6.2.5 The adopted Local Plan confirms the key principles as including:

- Optimise the use of land
- Integrate movement and land use
- Reinforce a sense of place
- Diversify and grow the economy
- Good design from the outset

6.2.6 Lambeth Local Plan Policy H1 states that the council will seek to maximise the supply of additional homes in the borough to meet and exceed the annual housing target for Lambeth as set out in the London Plan for the period 2015 to 2030 by:

- (i) working with relevant partners to take full advantage of opportunities to deliver sustainable new housing, and in particular maximise the delivery of affordable housing, including through estate renewal and regeneration strategies;
- (ii) supporting development proposals that provide a mix of housing types and tenures to meet current and future housing need and accord with applicable policies set out in the development plan; and
- (iii) seeking levels of residential density consistent with London Plan guidelines, having regard to the provision of other uses on the site, availability of local services, access to and capacity of public transport, urban design context, quality of design and impact on existing and future residents and the local environment

6.2.7 In this context, subject to other planning considerations, as a site that is adjacent to the CAZ and an Opportunity Area, on brownfield land, within 50 m of a Major Centre, with a PTAL of 6A/ 6B, the principle of a high density residential development is robustly supported by national, regional and local policy.

6.2.8 This position has been supported by the GLA both at in principle pre application stage and at detailed pre application stage:

*“The introduction of a significant amount of residential development is... supported in line with London Plan and draft London Plan policy.”*

## **Loss of C2 Use**

6.3.1 The Woodland Care Home, while being vacant, sits within use class C2 and is afforded in principle protection through policy. Adopted Lambeth Local Plan Policy H8 specifically relates to C2 housing, both in respect of its provision and where its loss is proposed as part of a redevelopment proposal, and protects existing C2 housing which meets identified specific community needs unless it can be demonstrated that either:

- the accommodation is no longer needed and the new accommodation will instead meet another identified priority local need; or
- the existing accommodation will be adequately re-provided to an equivalent or better standard on-site or elsewhere in the borough.

6.3.2 This position is continued through into the Local Plan Review.

6.3.3 The Draft London Plan acknowledges that the loss of social infrastructure can have a detrimental effect on a community, and where possible, boroughs should protect such facilities and uses, and where a development proposal leads to the loss of a facility, require a replacement that continues to meet the needs of the neighbourhood it serves. It goes further to state:

*Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:*

*1) identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related*

*commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies*

*2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes*

*3) regularly assess the need for health and social care facilities locally and sub regionally, addressing borough and CCG cross-boundary issues*

6.3.4 The loss of this health care facility pre dates this application, the buildings have not been in use since 2013, and are currently looked after by a security firm. Woodlands originally provided 38 places (28 for Lambeth residents) and was constructed in the 1990s by Lambeth Healthcare and transferred to South London and Maudsley NHS Trust (SLaM) in 1999. The accommodation provided no en suite facilities and the design pre dated NHS requirements for single sex accommodation.



6.3.5 There is a second SLaM NHS foundation care facility, Greenvale, in Streatham; this has historically provided 28 places as part of a stand-alone unit, and both of these facilities traditionally housed residents transferred from long-stay hospitals, along with people admitted on the following basis:

- Via acute in patient units, where it became apparent that a patient had longer term needs
- From care homes via acute distress, or behavioural symptoms of dementia
- Long term mental illness such as schizophrenia or bi-polar disorder
- Learning disability or alcohol related problems presenting as a crisis.

6.3.6 Many of these residents ended up in long term and indefinite placements, continuing after the original behaviours and symptoms had disappeared, a situation not commensurate with current medial practice.

6.3.7 In the last 15 years, national policy has driven a substantial change in the delivery of care to people with complex mental health needs, with an emphasis on independence and choice. Care is now more focused on person-centred treatment of dementia and functional mental illness and less reliant on pharmacological intervention. Care is no longer seen as

institutionalised in a hospital based environment, but better provided in the community and in a person's home, or place of residence. Clinical care is essentially planned and preventative rather than based on crises management, and is a three way dialogue with patient and relative, addressing current need and considering future care.

6.3.8 In response to national policy, then, Lambeth CCG has invested in local services to enable early detection and better planned and supportive person-centred care. Lambeth CCG have jointly commissioned a new 'Memory Service' with Southwark CCG, Kings Health Partners with SLaM as the lead provider established this service in 2010. The function of the service is to increase early diagnosis of dementia and provide support people with dementia and their carers in remaining independent; to commence cognitive enhancers working jointly with the patient's GP as part of shared care protocol, to work with other statutory and voluntary sector providers to prevent crisis, with ongoing care and support.

6.3.9 In this context, although there are increasing numbers of people with dementia, fewer people are presenting in crises requiring emergency admission. This is due in part to the early intervention work of the integrated Memory Service, but also due to the establishment of Community Mental Health Teams, diagnosing people with dementia at an earlier stage and working with relatives and carers to provide appropriate support and interventions to prevent crises.

6.3.10 Lambeth CCG has also supported the introduction of a Home Treatment Team for older adults that safely supports people with complex mental health problems and their families at home or their place of residence, during crises.

6.3.11 Lambeth CCG also makes 'quality' (CQUIN - Commissioning for Quality and Innovation) payments to local acute hospitals (Guy's and St Thomas' Hospitals and King's College Hospital) to support improved recognition and care to people with dementia and their carers and to ensure there is dedicated clinical knowledge available in the hospital to support best clinical care,

6.3.12 The previous approach to complex mental health issues, which effectively comprised a one size fits all 'care home' approach, has been replaced by a multi variable set of initiatives, built around patient and carer need. This range of preventive services has resulted in a reduced need for SCU admission for people with dementia and severe functional disorders (mood disorders and schizophrenia). Crises can often now be averted and patients can be treated through a range of options that includes either managed at home, in a care home or discharged directly from acute units, rather than having an additional stay in a SCU.

6.3.13 Lambeth currently sits in the top 10% nationally for early diagnosis of dementia and with the additional investment of support to GP practices in early detection, it is hoped to improve this further.

6.3.14 Many services elsewhere in the country have successfully moved to this model of care for people with dementia and the JCPMH, the APPG, the Alzheimer's Society, and Royal College of Psychiatrists and the British Psychological Society advocate community based treatments rather than long term institutional care.

6.3.15 The key principle behind these policies is to ensure that there is no net loss in service provision, and no reduction in health care facilities for residents. As the Draft New London Plan acknowledges such decisions are essentially fluid and change in accordance with best practice and improved understanding of clinical need. In practice then, the Draft New London Plan approach is closer to the realities of healthcare provision, in that national policy has driven substantial change in the delivery of care to people with complex mental health needs, with a move to an emphasis on independence and choice. As a result care is no longer based on institutionalisation in a hospital/ care home environment, but provided in the community, or a person's place of residence. This sits as part of an overall strategy of prevention and early intervention, resulting in a reduction in people presenting in crisis. As part of this overall approach to clinical need, a rigorous assessment was taken as to requirements and as to whether Woodlands should be kept open. As a result of this, within the context of an overall strategic healthcare package, Woodlands was consolidated with the Greenvale Unit in Streatham. At the time of the closure of Woodlands, only 12 beds were occupied, and the design and layout was substandard, pre dating current NHS requirements.

6.3.16 It is worth noting that this was always a cross borough facility, although its re-provision does remain within the borough. Within the context of the above policies, this will never have been a 'local' borough specific facility, and allocation will have been done on a sub-regional basis. Its closure and re-provision on the same basis therefore meets the tests of the relevant planning policies.

6.3.17 The loss of the Care Home, then, meets both of the Lambeth policy tests in that it is no longer needed; the healthcare problem which it was designed to address is being met through a mixture of alternative, more patient driven, strategies, and where necessary, a facility elsewhere in the borough, and the site is being brought forward as an identified priority local need.

6.3.19 Further, a case may be made for the use to have been abandoned. Case law has determined that abandonment may occur where there has been a deliberate intention to cease a use by reason of the premises having been left vacant for a considerable period or the buildings having deteriorated to the extent that their re-use would involve works that would be tantamount to a re-build. As these have not been in use since 2013, and at that point did not comply with NHS guidelines, while this case is not specifically being made here (as the relevant policy tests are being met), it still holds weight as a material planning consideration.

## **Preservation of Cultural Use**

6.4.1 Planning permission/01751/FUL grants consent for The Masters House, Dugard Way, Off Renfrew Road, and Kennington London for:

*"Conversion and change of use from hospital to a cinema museum, with ancillary car parking".*

6.4.2 This permission includes a condition limiting the use to a cinema museum and for no other use, including those within the same use class.

6.4.3 The condition on the original permission prevents this from being treated as a general D2 use, and therefore should its lease expire, and the building become vacant, it is difficult to see how the Cinema Museum use could be protected within planning policy. While the lease itself is not a planning issue, the ceasing of the use as a Cinema Museum is, and within the meaning of the condition, the only protected use would be an alternative Cinema Museum.

In the absence of a Cinema Museum, any development on the site could not be assessed against policies applying to a generalised D2 use and the local planning authority would find it very difficult to protect a planning sense. This would theoretically revert to its previous authorised use as a 'hospital', which again, could be easily argued to have been abandoned as a use, and unable to be reinstated without extensive modification to the building. In this context, from a policy position there is no protection for the use and no planning use should the existing use cease.

6.4.4 Notwithstanding this position, the Cinema Museum is a much loved facility, winning the Time Out Most Loved Local Culture Spot 2018, and it is a key priority for the development that it be integrated and a core component. The Museum has been on an, insecure, rolling one year lease historically, as a result of which it has been unable to have a secure future, or access funding. Consequently, while it is a culturally significant site, it is run on a volunteer basis, frequently not open, and the fabric of both the building and its contents deteriorating. There is no long, or medium term, programme for its survival.

6.4.5 It is proposed as part of this development that the Cinema Museum be placed on a permanent lease/ or other form of permanent solution, and these discussions have been occurring with the Cinema Museum and the GLA to ensure a suitable solution.

6.4.6 Placing the Museum on a secure footing is a policy key outcome for the GLA and LBL. The GLA pre app response (Feb 2019) states:

*The applicant's intention to offer a permanent home to the Cinema Museum within Woodlands House is strongly supported, as this would not only secure an active use for the Grade II listed building but would also ensure that the future of an important local cultural and community asset is secured. Protecting the Cinema Museum is a Mayoral priority, and GLA officers would want to see the museum securing a long lease with affordable rental levels and public accessibility (which would allow the museum to have enough exhibition space to support a long—term sustainable business model]. Discussions on the terms of the lease agreement are currently happening between the developer and the Cinema Museum. It would be helpful for GLA officers to understand the details of these terms. The terms of the agreement between the applicant and the museum should be secured through a planning obligation*

6.4.7 In this context putting the Museum on a permanent footing is a key policy outcome, a major public benefit, and its retention is a central to the development.

## Housing

6.5.1 London's desperate need for more homes is well established at all levels of policy. The first Strategic Objective (Strategic Objective A) of the Local Plan is to increase the overall supply of housing by at least 17,925 additional dwellings, and increase the mix and quality of housing to address the need for all types of housing, including affordable housing and the needs of different groups in the community.

6.5.2 The delivery of housing is at the centre of the NPPF

*To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay*

6.5.3 The Draft London Plan goes on to state:

*Providing a range of high quality, well-designed, accessible homes is important to delivering Good Growth, ensuring that London remains a mixed and inclusive place in which people have a choice about where to live. The failure to provide sufficient numbers of new homes to meet London's need for affordable, market and specialist housing has given rise to a range of negative social, economic and environmental consequences, including: worsening housing affordability issues, overcrowding, reduced labour market mobility, staff retention issues and longer commuting patterns*

6.5.4 Policy H1 of the adopted Local Plan states

*The council will seek to maximise the supply of additional homes in the borough to meet and exceed the annual housing target for Lambeth as set out in the London Plan for the period 2015 to 2030*

Planning Authority	Ten-year housing target	Annualised average
Kensington & Chelsea	4,880	488
Kingston	13,640	1,364
Lambeth	15,890	1,589
Lewisham	21,170	2,117
London Legacy Development Corporation	21,610	2,161
Merton	13,280	1,328
Newham	38,500	3,850
Old Oak Park Royal Development Corporation	13,670	1,367
Redbridge	19,790	1,979
Richmond	8,110	811
Southwark	25,540	2,554
Sutton	9,390	939
Tower Hamlets	35,110	3,511
Waltham Forest	17,940	1,794
Wandsworth	23,100	2,310
Westminster	10,100	1,010
<b>Total</b>	<b>649,350</b>	<b>64,935</b>

6.5.5 The Lambeth Local Plan Review has reviewed the housing targets within the borough in preparing a Housing Strategy (2017) and an updated Strategic Housing Market Assessment (2017). These documents form part of the Local Plan review evidence base and acknowledge that providing more homes available to households on a range of incomes and needs is a priority. While the Housing Strategy makes reference to the current London Plan housing target for Lambeth (1,559 new homes per year); it should be noted that the Draft London Plan has again re-assessed housing requirements across the City and has prescribed a 10 year monitoring target of 15,890 dwellings for Lambeth annualised as 1,589. The proposed revised Policy H1, in accordance with this approach, seeks to optimise housing delivery on all brownfield sites.

6.5.6 The proposed residential redevelopment of the site would be consistent with this objective and significantly contribute towards LBL meeting its housing targets, complying with policy H1, the London Plan and the Draft London Plan.

### Optimising Density

6.6.1 Density is never more than an indicator of the appropriateness of development and as such is acknowledged to be a blunt and imperfect tool. While the Draft London Plan no longer contains a density matrix, it does set out densities above which a higher level of scrutiny will be required, effectively establishing a level of reasonableness across a range of site typologies. This is broadly set around density thresholds of 1) 110 units per hectare in areas

of PTAL 0 to 1; or 2) 240 units per hectare in areas of PTAL 2 to 3; or 3) 405 units per hectare in areas of PTAL 4 to 6.

6.6.2 The Draft London Plan does go on to place significant importance on optimising density, particularly on brownfield sites:

*“boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary”*

*Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to: 1) the site context 2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL) 3) the capacity of surrounding infrastructure. Proposed residential development that does not demonstrably optimise*

6.6.3 Within the framework of the both key policy documents in process of revision, the Adopted Local Plan again prioritises high density development as being ‘essential’ linked to design:

*High-density development will continue to be an essential element in meeting Lambeth’s many needs over the next 15 years, and excellent design and management will be key to preventing problems that can be associated with high density, such as noise, disturbance, overlooking and poorly maintained shared areas*

6.6.4 It goes on to state that the approach to density should reflect the London Plan and that:

*“seeking levels of residential density consistent with London Plan guidelines, having regard to the provision of other uses on the site, availability of local services, access to and capacity of public transport, urban design context, quality of design and impact on existing and future residents and the local environment”*

6.6.5 The adopted approach then links explicitly to the adopted London Plan Density Matrix.

6.6.6 While bearing little weight, the draft Revised Local Plan alters the policy position to be consistent with the Draft London Plan:

*seeking to optimise levels of residential density in accordance with the design-led approach set out in London Plan policy...guidelines, having regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL); and the capacity and quality of provision of surrounding infrastructure*

6.6.7 The approach then moves away from a prescriptive density matrix and to a design based approach underpinned by a range of densities with a locational component, to inform what might be appropriate on any given site. This explicitly acknowledges density as being a secondary tool to good design. The GLA submission to the EIP interrogates this position, again stating the matrix to be something of a blunt tool, that even as existing provides only an indicative guideline of the potentiality of a site, and that it should not be applied mechanistically to constrain development potential where it can be demonstrated, owing to site-specific circumstances, that a higher (or lower) density is more appropriate.

6.6.8 As it stands, 50 per cent of approved developments since the publication of the 2004 London Plan, have been delivered at higher densities than the relevant indicative density ranges in the matrix; 35 per cent of development has been within the relevant density matrix range and 15 per cent below the bottom end of the relevant density range.

6.6.9 As neither the DLP nor the Draft Revised Local Plan have been adopted these positions hold limited weight; however this is a shift in emphasis rather than a full change in policy with the matrix still being used to inform design. It is therefore reasonable to test the proposed development against the density matrix as a jumping off point.

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)

Setting	Public Transport Accessibility Level (PTAL)	Setting	Public Transport Accessibility Level (PTAL)
	0 to 1	2 to 3	4 to 6
<b>Suburban</b>	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha
<b>3.8–4.6 hr/unit</b>	35–55 u/ha	35–65 u/ha	45–90 u/ha
<b>3.1–3.7 hr/unit</b>	40–65 u/ha	40–80 u/ha	55–115 u/ha
<b>2.7–3.0 hr/unit</b>	50–75 u/ha	50–95 u/ha	70–130 u/ha
<b>Urban</b>	150–250 hr/ha	200–450 hr/ha	200–700 hr/ha
<b>3.8–4.6 hr/unit</b>	35–65 u/ha	45–120 u/ha	45–185 u/ha
<b>3.1–3.7 hr/unit</b>	40–80 u/ha	55–145 u/ha	55–225 u/ha
<b>2.7–3.0 hr/unit</b>	50–95 u/ha	70–170 u/ha	70–260 u/ha
<b>Central</b>	150–300 hr/ha	300–650 hr/ha	650–1100 hr/ha
<b>3.8–4.6 hr/unit</b>	35–80 u/ha	65–170 u/ha	140–290 u/ha
<b>3.1–3.7 hr/unit</b>	40–100 u/ha	80–210 u/ha	175–355 u/ha
<b>2.7–3.0 hr/unit</b>	50–110 u/hr	100–240 u/ha	215–405 u/ha

6.6.10 As referred to earlier in this statement, the matrix assesses urban typologies on a scale of central to suburban and references them against accessibility:

- central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.
- urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and

typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes

- Suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

6.6.11 For the purpose of the exercise it is necessary to establish the character of the area, and it should be axiomatic that the character of an 'area' is not determined by the character of a single street; by definition the term 'area' encompassing a broader and less easily definable geographic space. However for clarity, the character areas clearly infer both 'character' and 'area' as being a broad concepts, the definitions of which are perhaps synonymous with 'neighbourhood' and encompass a series of typologies. It is acknowledged that the site has low density two/ three storey housing immediately on three sides; however this is not representative of, or comprise, the 'character' of the area. Dante Road is characterised by four storey student blocks along the eastern side, before the Uncle building at 44 storeys; the Bellway Homes development is varied, but five storeys immediately adjacent to the site; Renfrew Road has a range of typologies ranging from three to six storeys; the residential block to the immediate south of the Kennington Lane is ten storeys; the residential blocks to the immediate west along Kennington Lane (further out from E&C) are fifteen storeys.

6.6.12 As a site bounding the CAZ and the OAPF and within 50 m of a Major Town Centre, this is clearly a 'central' site, and the appropriate benchmark guidelines for density flow from this, not just within the context of the London Plan definitions, but also from the feel of its character, the visual language and the lived experience, with a range of blocks and point blocks visible in any direction. In this context the appropriate benchmark against which the development might be tested, for the quality of its design, and what optimal might be, is 215 – 405 uha.

6.6.13 For the purpose of site calculation, the GLA Housing SPG (2017) states that density should not be defined in a static way in relation to the character of the surroundings area, without considering: the potential for large sites to define their own characteristics in terms of setting and densities; and for new development to be successfully integrated into its immediate context through considerate design.

6.6.14 This site in particular is mixed use in nature without specifically fitting within any of the traditional typologies of density calculation. The London Plan, then, defines density in terms of net residential site area (the red line boundary including the proposed homes, non-residential uses in mixed-use buildings, ancillary uses, car and cycle parking areas and proposed internal access roads. It generally includes proposed on-site open spaces (including publicly accessible spaces), gardens and children's play areas) and allows for a bespoke approach to complex sites - where schemes have a substantial proportion of non-residential uses, for example more than 30% - 35%, the density matrix can usefully be complemented by plot ratio in addition to calculating density.

6.6.15 Lambeth Policy T1 states that development that generates a significant number of trips will be required to be located in an area with an appropriate level of public transport accessibility and where public transport capacity can accommodate the proposed increase in number of trips, or where capacity can be increased to an appropriate level. Separate to the above, as a locational policy, this appears to be the sole policy that specifically links appropriate levels of development to the transport network. As would be expected, there are no locational policy requirements that differentiate, within highly public accessible sites, to link density and quantum to a specific relationship with the hierarchy of the road network. Any such approach, would, in effect link density to road network access and be contrary to the provisions of the Local Plan, the London Plan and the Draft London Plan. While the proposed development is car free, the principle applies – the location of any site in relation to public transport is a key policy requirement; the relationship of any site to the road network, as a hierarchical system, is not.

## **Backland Development**

6.7.1 The possibility of this being treated as a backland site has been raised. At present, while the adopted Local Plan provides a policy position on ‘garden development and backland sites’, and defines previously developed backland sites as “*outbuildings, garage blocks etc*”, it makes no further attempt to define the term. The Draft Revised Lambeth Plan (2018) excises this policy reference, but adds in:

*“The presence of existing development in back gardens or previously developed rear sites should not automatically be seen as justification for further development as the cumulative effect of such development may be unacceptable; especially in conservation areas where spatial openness may be a positive characteristic”*

6.7.2 The Draft London Plan Minor Suggested Changes, makes no reference to backland sites, and it is reasonable to infer from this that the approach to such sites is rolled into the policy position on ‘small sites’, which clearly encompasses backland and garden development. In this context the usual planning definition of back land development is:

*“Development of ‘landlocked’ sites behind existing buildings, such as rear gardens and private open space, usually within predominantly residential areas. Such sites often have no street frontages.”* (Planning Portal Glossary of Planning Terms)

6.7.3 The site, subject of this development, is a sizable site, comprising the best part of an urban block, with an access road running the length of it; it currently contains the Cinema Museum and the SLAM care home. It is not landlocked, and does not comprise anything that could reasonably be encompassed by the description “*outbuildings, garage blocks etc* “. The fact that Dugard Way, as it enters the site, doesn’t contain any residential properties, does not make this a ‘*rear site*’ and in fact the Bellway development affordable block fronts onto the site at the southern end.

6.7.4 The coupling of ‘back garden sites’ and ‘back-land’ sites into the same policy, further, makes clear the purpose and intent of the policy, and therefore the type of site and planning issue it is designed to address; small sites that are essentially landlocked, which would have

been traditionally hard to develop, which would only be coming forward now in the context of a changing market and a planning presumption in favour of residential development, and would be subject of applications for two or three units.

6.7.5 This site is large enough to be master planned and is only 'back land' in the sense that every site is at the back of something. Indeed, while the planning history of the site is limited, the planning approach to the Cinema Museum and the previously developed SLAM facility have never been that this is a back-land site and planning decisions around their future have never been within this context.

## **Tall Buildings**

6.8.1 The principle of tall buildings in accessible locations is encouraged in both the London Plan and the Draft London Plan. The adopted London Plan states that tall buildings should be generally limited to sites in the Central Activity Zone, opportunity areas, of intensification or town centres that have good access to public transport, subject to other test against recognised planning interests and the provision of other planning benefits, and the adopted Local Plan sits within this framework, in its assessment of appropriate locations for tall buildings.

6.8.2 The issue of tall buildings is inextricably linked to optimisation and density, with one being the physical expression of the other, subject to design and testing. So:

*“those involved in planning and development must: Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach”.*

and:

*“boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:*

*a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary...Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:*

*1) the site context*

*2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)*

*3) the capacity of surrounding infrastructure. Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused."*

6.8.3 The general approach involves ensuring that views are assessed and that development take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm.

6.8.4 Draft New London Plan Policy D8 sets out the new criteria for tall building development:

*"Tall buildings should only be developed in sustainable locations that are identified in Development Plans - By following the processes required in parts A, B and C of Policy D2 Delivering good design."*

6.8.5 This is a change in emphasis that has come forward through the minor suggested changes, and has been the source of much discussion at the EIP. While in accordance with the NPPF the approach is currently of limited weight. Mayoral Note M41 to the EIP makes it clear that the policy should be rigorously applied to determine the location of tall buildings, so as not to unduly restrict their location, but to provide a joint approach to ensure that development on all sites is optimised.

*"Thus, through the implementation of Policy D2 A-C, potential suitable location for tall buildings can be identified. Then by following Policy D8 B1-3, boroughs can determine if these locations are appropriate for tall buildings and, if they are, what height of building would be appropriate"*

6.8.6 In this context the key factors in understanding the residential capacity and building height, in accordance with the Draft London Plan involves:

- demographic make-up and socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)
- housing type and tenure
- urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)
- transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned)
- air quality and noise levels
- open space networks, green infrastructure, and water bodies
- historical evolution and heritage assets (including an assessment of their significance and contribution to local character)
- topography and hydrology
- land availability
- existing and emerging development plan designations

- existing and future uses and demand for new development, including housing requirements and social infrastructure.

6.8.7 These criteria should then be used to establish the most appropriate forms of development for an area in terms of scale, height, density, layout and land uses, with the specific aim of ensuring the most efficient use of land so that development on all sites is optimised. The emphasis is then on optimisation and encouraging such.

6.8.8 The draft London Plan also acknowledges that consideration should be given to:

*“Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding”*

6.8.9 The Adopted Local Plan sets out areas in which tall buildings are inappropriate - Lambeth Policy Q26 states that proposals for tall buildings will be *supported* where:

- they are not located within areas identified as inappropriate for tall buildings;
- there is no adverse impact on the significance of strategic or local views or heritage assets including their settings;

6.8.10 As the site is not within an area defined as ‘inappropriate for tall buildings’ in the Local Plan, there is de facto support for the principle of a tall building on the site. The Local plan goes further, acknowledging that there can be positive benefits to tall buildings:

*Tall buildings are one form of high-density development that can be appropriate for some uses and in some locations, again subject to excellent design, protection of strategic views, good public transport accessibility and consideration of the impact on the surrounding area. They can also provide more opportunities for the creation of space between buildings than is possible through lower level development involving extensive site coverage. Tall buildings can also contribute to place-shaping by providing landmarks and defining gateways*

6.8.11 The proposed development maximises the use of space, acts as a landmark, and serves to improve permeability in the area. This position is reinforced by the location of the site directly adjacent to both the Southwark borough boundary and the Elephant and Castle OAPF boundary. While this is not reflected in Lambeth Policy, there are clearly cross borough issues around the context of tall buildings within the immediate environment, and which are encouraged (and approved) on nearby sites through the Elephant and Castle OAPF.

6.8.12 The Lambeth Draft Local Plan Review, alters the onus of the approach, positioning support for tall buildings as conditional on being within specifically identified areas, while allowing flexibility to grant exceptions where the applicant can demonstrate acceptability:

*a) Proposals for tall buildings will be supported where:*

*i) they are located within areas identified as appropriate for tall buildings in Annex 11;*

*ii) there is no unacceptable impact on the significance of strategic or local views or heritage assets including their settings;*

*iii) design excellence is achieved (in terms of form, and silhouette);*

*iv) the proposal makes a positive contribution to the townscape and skyline either individually to form a distinctive landmark or as a contribution to a group;*

*v) it is of the highest standards of architecture, detailing and materials; and*

*vi) it adequately addresses the criteria in London Plan policy D8C and does not have an unacceptably harmful impact on its surroundings including microclimate, wind turbulence, noise, reflected glare, aviation (including the safeguarded zones around Heathrow Airport and Battersea Heliport, and the helipad at King's College Hospital), navigation and electronic communication telecommunication or broadcast interference; and vii) it can be shown that site can accommodate the quantum of development proposed in terms of meeting acceptable standards of access, accessibility, and servicing for the uses proposed.*

*c) Where tall buildings come forward outside the areas identified in Annex 11, the onus will be on the applicant to show the appropriateness of the site for a tall building and that points (a) (ii), (iii), (iv), (v) and (vii) are met along with all other relevant planning policies. In addition:*

*i) where proposed near existing tall building groups, proposals should follow the established principles of the group composition such as stepping down in height around cluster edges;*

*ii) proposals for tall buildings will only be considered acceptable in established, low-rise residential neighbourhoods where they are part of a comprehensive scheme which integrates well with the locality.*

6.8.13 The purpose of this policy is to tie in with the Draft London Plan Minor Modifications, and at present holds little weight. However, it should be noted that the Annex 11 referred to, covers geographically specific tall building approaches to Waterloo, Vauxhall and Brixton, while relying on the Lambeth Tall Building Study (2014) as the base evidence. There is nothing new, then, in the evidence base that justifies this shift in emphasis, and the Annex itself purely states that:

*“The Lambeth Tall Buildings Study (September 2014) and the Brixton Tall Buildings Study (2014) were written to provide an evidence base to the Local Plan 2015. The revised maps contained here are the result of further building height studies undertaken for Brixton, Vauxhall and Waterloo in 2018. “*

6.8.14 This explicitly suggests that the additional evidence is limited to Waterloo, Vauxhall and Brixton, and sits within the Tall Building Study (2014), and we can see no evidence as to how the change in policy has been assessed in relation to the Draft London Plan criteria in coherent way, rather than the existing position being adapted and reversed without justification or reference to further evidence.

6.8.15 The appropriate approach, as established by the GLA, would be to assess the entire approach according to the key criteria for tall building sites. These are a combination of borough wide and site specific, and it is reasonable to assume that there is no disagreement that the demographic base of the area, as assessed through the SHMA and evidence base, shows a requirement for housing at appropriate densities, and that this is reflected in the broader policy positions on accessible inner London sites. As is understandable in a policy constructed to address the determination of tall building sites London wide, the criteria are broad and largely apply to how a suburban site might, or might not, fit within the policy framework. For an inner London site, directly adjacent to the CAZ, the issues largely centre around urban context and a detailed assessment of the appropriateness of the particulars of *this* tall building on *this* site.

6.8.16 Nonetheless the Draft Local Plan Review does acknowledge a broader approach in criteria c) - Where tall buildings come forward outside the areas identified in Annex 11, the onus will be on the applicant to show the appropriateness of the site for a tall building with regard to views, heritage, design and townscape, and these are all assessed as party of this submission.

6.8.17 As above, Lambeth Policy T1 states that development that generates a significant number of trips will be required to be located in an area with an appropriate level of public transport accessibility and where public transport capacity can accommodate the proposed increase in number of trips, or where capacity can be increased to an appropriate level. Separate to the above, as a locational policy, this appears to be the sole policy that specifically links appropriate levels of development to the transport network. As would be expected, there are no locational policy requirements that differentiate, within highly public accessible sites, to link density and quantum to a specific relationship with the hierarchy of the road network. Any such approach, would, in effect link density to road network access and be contrary to the provisions of the Local Plan, the London Plan and the Draft London Plan. While the proposed development is car free, the principle applies – the location of any site in relation to public transport is a key policy requirement; the relationship of any site to the road network, as a hierarchical system, is not.

6.8.18 The thrust all of this policy framework, both adopted and unadopted, is to establish a policy hierarchy starting with an ‘in principle’ position as to whether a site is suitable for a tall building and then moving on to a more detailed assessment of the specifics of the site. As a highly accessible site in a central area adjacent to the CAZ and within 50 m of a Major Centre, the site is clearly appropriate *in principle* for a high density tall building, subject to being tested against the other policy positions.

6.8.20 The character of the area as discussed above is mixed but central - Dante Road is characterised by four storey student blocks along the eastern side, before the ‘Uncle’ building at 44 storeys; the Bellway Homes development is varied, but five storeys immediately adjacent to the site; Renfrew Road has a range of typologies ranging from three to six storeys; the residential block to the immediate south of the Kennington Lane is ten storeys; the residential blocks to the immediate west along Kennington Lane (further out from E&C) are fifteen storeys.

6.8.21 In this context the proposed location meets all the relevant tests established by the policy for such a location. Given the purpose of the policy change, it is significant that there has been consistent support from the GLA for a tall building on this site:

*As the site is on the periphery of the Opportunity Area and Elephant and Castle major town centre, a tall building of exemplary design could relate appropriately to the existing and emerging context of tall buildings around Elephant and Castle. However, the height of the building would need to be fully tested in terms of its localised impact on heritage assets and wider townscape views (this is further detailed in the heritage section of this report), and demonstrate exemplary design in terms of architecture, quality of the amenity space and residential quality (this is further developed in the urban design section of this report) to be acceptable. Subject to this being demonstrated, officers would be supportive of the principle of a tall building on this site. (GLA Feb 2019)*

6.8.22 Subject to the detailed modelling of proposed development the principle of a tall building is clearly acceptable, and been accepted by the LPA as the appropriate way of addressing the site in the pre application process.

## Views

6.9.1 In accordance with London Plan guidance and in light of the site's location a Heritage Townscape and Visual Impact Assessment (HTVIA) has been submitted with the planning application which assess a range of view. This has been scoped with the LPA and assessed against the following:

- National Planning Policy Framework (2018) and Planning Practice Guidance (2014)
- The Lambeth Local Plan (September 2015)
- Lambeth Tall Building Study (2014)
- Lambeth Local Views Study (Final – July 2014)
- Elephant and Castle Opportunity Area, Supplementary Planning Document/Opportunity Area Planning Framework (March 2012)
- The Southwark Plan (July 2007)

6.9.2 The Site was reviewed against the London Views Management Framework (LVMF) 2012 and does not sit within any of the 13 protected vistas, as set out in the guidance. However, it does sit within the 'field of view' of the following designated views:

- London Panorama from Assessment Point 4A.1: Primrose Hill to St Paul's (11)
- River Prospect from Assessment Point 15A.2: Waterloo Bridge looking upstream from the Westminster bank (12)
- River Prospect from Assessment Point 17A.2: Hungerford Footbridge looking upstream from the Westminster bank (13)
- River Prospect from Assessment Point 18A.3: Westminster Bridge looking upstream from the Westminster bank (14)
- River Prospect from Assessment Point 20A: Victoria Embankment between Westminster and Hungerford Bridges (15)

6.9.3 The Site falls within several local view corridors as defined in the Lambeth Local Views Study (2012). The composition and character of these views are protected within the Lambeth Local Plan (2015) Policy Q25:

- Millbank at gateway into triangular garden south of Lambeth Bridge (9)
- View SE and SSE along Westminster Bridge Road to Lincoln Tower (10)
- View North from Brockwell Park to the city (A)
- View North from Gipsy Hill (B)
- View NNE from Norwood Park to the city (C)

6.9.4 In discussion with the LPA it was established that the view from Victoria Gardens across Lambeth Palace was particularly important in the preservation of the silhouette. Other important undesignated views were agreed with the LPA and were subject to assessment.

6.9.5 A townscape and visual assessment has been undertaken based on site survey and analysis and submitted with the application and includes:

- A review of relevant policy and guidance;
- Identification of the baseline quality and characteristics of the local townscape character and local views and identification of key visual receptors and representative viewpoints; and,
- Assessment of the impact of the proposed development on townscape character and key views.

6.9.6 The Site is located partly within Renfrew Road Conservation Area, and there are other Conservation Areas located within 500m of the Site including Kennington Park Road Conservation Area (Southwark); Kennington Conservation Area (Lambeth); Walcot Conservation Area (Lambeth); Elliott's Row Conservation Area (Southwark); and West Square Conservation Area (Southwark). Key issues arising from the review of policy and guidance documents of relevance to the Site were:

- Renfrew Road Conservation Area Statement 2007 – the Conservation Area is a heritage asset of importance to the character of this area of Lambeth. The Site falls partly within the Conservation Area, and the proposed development will affect views from within the wider designation;
- Elephant and Castle Supplementary Planning Document (SPD) and Opportunity Area Planning Framework (OAPF)- The Site is located outside of this Opportunity Area, but would play a role in the relationship of tall buildings within the area and surrounding townscape and provide a transitional feature between the height of buildings in the Opportunity Area and the wider townscape; and
- Other Conservation Area Appraisals within 500m of the Site- the Site falls close to several conservation areas, both within the boroughs of Lambeth and Southwark. The proposed development would be likely to indirectly affect the character and views within these various designations.

6.9.7 The assessment of townscape context identified that the northern nursing home section of the Site itself currently detracts from the character and quality of the surrounding

townscape; the Cinema Museum provides positive contributions to the visual and townscape character of the area, but the ability to perceive this feature is limited due to the lack of access into the Site or through movement. The townscape character of the north of the Site has therefore been identified as being of Low-Medium Sensitivity (TCA 2 – Mid 20th Century Residential Area) with the southern area, which forms part of Renfrew Road Conservation Area being of High-Medium Sensitivity (TCA 3 – Terraced residential streets).

6.9.8 A Zone of Theoretical Visibility (ZTV) for the proposed development was produced which illustrated the maximum extent of area from which the proposed development was likely to be visible. This was used to identify key visual receptors and key views with potential to be affected by the proposed development and to inform the selection of representative views. It was noted that the Site falls within the viewing corridors of 5 LVMF views, and 2 Lambeth Local Views Study (2014) views.

6.9.9 Key visual receptors with existing views towards the Site were identified. These included:

- Pedestrians and road users within surrounding streets: Renfrew Road; Kennington Park Road (A3); Elephant and Castle Walworth Road interchange; Kennington Lane/Kennington Road junction; Elephant and Castle gyratory; and Hayles Street;
- Pedestrians, road users and open space users within surrounding squares: Walcot Square; West Square; St Mary's Garden; and Victoria Tower Gardens (Westminster);
- Open Space users within surrounding open spaces: Geraldine Mary Harmsworth Park and visitors to the Imperial War Museum Grounds

6.9.10 In agreement with the LPA eighteen representative viewpoints were identified to reflect these receptors and an assessment made of the character and quality of the existing view from these viewpoints.

6.9.11 The assessment of townscape impacts identified that the proposed development would result in generally neutral effects on townscape character due to the redevelopment of vacant land within the north of the Site, which is accompanied by new public realm spaces and a pedestrian route through the Site. Potentially negative impacts would include indirect effects to the more sensitive townscape character areas around the Site, through the introduction of new built form of a substantial scale and massing in an area which currently comprises of lower density built form.

6.9.12 The impact of the proposed development on the surrounding townscape character areas was assessed as:

- TCA 1 – Major town centre - Elephant and Castle – Beneficial Effect of Low Magnitude
- TCA 2 – Mid 20th Century Residential Area – Neutral Effect of High Magnitude
- TCA 3 – Terraced residential streets - Adverse Effect of Low-Negligible Magnitude
- TCA 4 – Parkland - Imperial War Museum grounds – Neutral Effect of Medium Magnitude

6.9.13 The principal townscape area from which the proposed development would be visible is the short distance views within the local town squares at West Square, Walcot Square, St

Mary's Gardens, as well as local streets aligned to the Site (including Renfrew Road and Hayles Street). Beyond this, the development would appear in the background of views to varying degrees of visibility.

6.9.14 Mature vegetation in the squares and open spaces would screen large parts of the development; the visibility of the proposed development would also be limited to views of the tower itself, with the lower Block A elements being largely screened from the wider townscape by the density of built form around the Site.

6.9.15 Lambeth specifically identified the view from Westminster at Victoria Gardens to be of particular importance as there is the introduction of new built form to the background of views towards Lambeth Palace. A series of sequential views were taken from this open space, which demonstrate that this view is already heavily altered by development within the Elephant and Castle Opportunity Area, and critically the proposed development falls behind the buildings of Lambeth Palace, at a point where the silhouette of this building is already aligned with the silhouette of the UNCLE building. The proposed development would therefore have very limited effect on the already altered perception of the palace structures.

6.9.16 The proposed development would have low to negligible effects on the LVMF views; where visible, the proposed development would constitute a small addition to the views, and would not noticeably alter the character of the view.

6.9.17 A further assessment of these issues is included below.

## **Heritage**

6.10.1 A full Heritage Assessment has been submitted with the application. This statement provides an appropriate and proportionate description of the significance (and also any contribution of the setting) of the heritage assets that would likely be affected by the proposed development at the application Site. The analysis establishes a robust baseline that has then been used to inform the overall scheme design through the pre-application process, and also upon which to assess the heritage impacts of proposed change. Accordingly, it is recognised that the Site and its surroundings include a number of individual and different heritage asset designations, which in many cases are also overlapping and interrelated physically, visually and historically as part of definable groups and or the wider townscape of this highly urban area.

6.10.2 The protection of heritage assets is a well-established planning principle through national, regional and local policy, and needs to be carefully addressed as part of the planning process, particularly the way that this policy priority interacts with other policy priorities around density, tall buildings and bringing forward accessible sites.

6.10.2 In considering proposed development affecting a conservation area, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty to pay special attention to the desirability of preserving or enhancing the area's character or appearance. A similarly worded duty under Section 66 of the Act requires special regard to be had to the desirability of preserving a listed building or its setting. Successive court judgments have re-affirmed the importance of these duties. Their application of these judgments to the

circumstances of an individual case means that “considerable and importance and weight” must be given to the desirability of preservation or enhancement in any balancing of the merits of a particular proposal.

6.10.3 National policy guidance set out in the NPPF confirms the great weight in favour of the conservation of “designated heritage assets”, such as conservation areas and listed buildings. The particular significance of any heritage assets likely to be affected by a development proposal should be identified and assessed, including any contribution made by their setting. Any harm should require clear and convincing justification. A balanced judgement should be made on the effects on any “non-designated heritage assets”, such as buildings on a local list. In effect, the NPPF sets up a sequential test for assessment:

a) When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. (Para 193)

b) Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. (Para 194)

Paragraph 193 establishes how impact on a heritage asset might be considered and assessed with great weight in this assessment being given to the assets conservation in that assessment; Paragraph 194 then establishes, having established that impact that this should require clear and convincing justification.

6.10.4 The concept of the *setting* of a conservation area is not enshrined in the legislation and does not attract the weight of statutory protection, although the NPPF advises that the setting of a heritage asset can contribute to its significance. Opportunities should be sought for new development within conservation areas and within the setting of heritage assets that would enhance or better reveal the significance of the heritage asset. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. However the corollary to this (i.e. that proposals that do not take such opportunities should be treated unfavourably) is not explicitly stated by the NPPF, and the NPPF does not introduce any separate test over and above the main test of balancing harm against benefits.

*“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”*  
(Paragraph 134).

6.10.5 The NPG specifically gives guidance on ‘public benefits’ in this context:

*Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the*

*proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.*

*Public benefits may include heritage benefits, such as:*

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation*

6.10.6 Paragraph 8 of the NPPF qualifies non-heritage public benefits as:

*There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:*

- *an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure*
- *a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being*
- *an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

6.10.7 The Draft London Plan ensures that views be assessed and that development take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm.

6.10.8 The guidance then, states that harm be assessed and public benefits be assessed and they be weighed against each other, with public benefits being defined in terms of heritage and non-heritage elements. There are two things that flow from this position:

- A reasonable and rigorous approach to 'harm'
- A reasonable and rigorous approach to 'public benefit'.



### Harm

6.10.9 The distinction between ‘harm’ and ‘substantial harm’ in heritage terms has long been a contentious issue, with little to define the terms prior to the publication of the National Planning Practice Guidance (PPG), supported by the conclusions reached by the Planning Inspectorate and Court of Appeal in recent decision making. The combination of these different sources allows a clear definition to be synthesised.

6.10.10 The PPG provides some clear guidance on where harm may be considered to be substantial, and this should be considered within the context of (and was, indeed, developed in the light of) recent appeal and high court decisions, referred to in more detail below. The PPG provides the following guidance on substantial harm:

*‘In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting. While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.’*

6.10.11 While this guidance is rather broad, the extent to which substantial harm can be considered to be a ‘high test’ has been confirmed within a number of legal decisions, most notably Bedford Borough Council v Secretary of State for Communities and Local Government

and NUON UK Ltd [2013] ('Nuon'), and the decision by the Secretary of State for Communities and Local Government relating to the Site known as Land at Chapel Lane, Wymondham, Norfolk ('Wymondham'). In the Nuon case, focusing on setting issues, the Inspector originally identified that, 'There is no specific guidance as to the level at which harm might become substantial but on a fair reading, it is clear that the author(s) must have regarded substantial harm as something approaching demolition or destruction.' ('Nuon' Judgement, para. 22) Conservation Area, 'substantial harm' can be identified as harm sufficient to challenge its statutory designation.

6.10.12 While it was queried whether this was setting too high a bar for substantial harm, Mr Justice Jay identified that the above statement, given that the harm under consideration was indirect, and based on setting, rather than physical intervention, the above quotation was clearly intended to be appended by the words 'to significance'. J Jay therefore concluded that:

*'What the inspector was saying was that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away. Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of nonphysical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced.'* ('Nuon' Judgement, para. 24-25)

6.10.13 As such, the Nuon judgement provides context for the NPG's identification that substantial harm will occur where an '*adverse impact seriously affects a key element of its special architectural or historic interest*'; such an adverse impact would have to impact upon a '*key element*' of the building's or conservation area's significance, such that the significance of the asset as a whole was '*either vitiated altogether or very much reduced*'.

6.10.14 Additionally, the Wymondham decision has provided further clarification of the meaning of substantial harm, and the '*draining away*' of significance. In this case, again focused on an impact upon the setting of a heritage asset (in this case, the Grade I listed Wymondham Abbey), it was identified by the Inspector that it was '*untenable to say the scheme would cause substantial harm to the significance of the Abbey*', and this was then upheld by the Secretary of State for Communities and Local Government. It was concluded that:

*'the scheme would not call into question the Grade 1 status of the building, and when in the immediate environs of the Abbey its special architectural and historic interest would be unaffected. I therefore do not share the Council's view that substantial harm would be caused to the setting of this listed building. Rather, the harm caused by the development in this regard would be less than substantial.'*

6.10.15 As such, it is quite clear that substantial harm is only relevant where harm will be caused to a '*key element*' of the building's or conservation area's significance, such that its significance is '*drained away*' to such an extent that its statutory designation should either be

reduced or removed. It can logically be concluded that while, in the case of the Grade I Wymondham Abbey, it might be considered appropriate to degrade the building's listing to Grade II\*, and to similarly treat other assets; in the case of a Grade II listed building or Conservation Area, 'substantial harm' can be identified as harm sufficient to challenge its statutory designation.

6.10.16 Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) The Setting of Heritage Assets sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets. This states:

*Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.*

6.10.17 The NPPF (2018) acknowledges that the setting of a heritage asset is not necessarily static, defining as:

*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*

6.10.18 The starting point for an assessment must be based on the need to understand the value of what is there at the moment i.e. the significance of the assets. The NPPF defines 'significance' as 'the value of a heritage asset to this and future generations because of its historic interest'. That interest may be archaeological, architectural, artistic or historic. The NPG goes on to state that the need to provide information is proportionate to the asset's importance and sufficient to understand the potential impact of the proposal on its significance. An assessment of harm can comprise the following:

- The impact on the significance of the asset;
- The seriousness of the impact;
- The importance of the asset;
- The nature of the proposal and the likely impact of those changes, if implemented; and
- Whether there are any suitable alternative solutions which cause less or no harm.

6.10.19 The NPG states that it is vital that the authority sets out the harm and public benefits very clearly and analyses those considerations to be able to come to an informed decision. The NPPF sets out how to analyse this, bearing in mind that heritage assets are irreplaceable, any harm needs clear and convincing justification, and there is a presumption in favour of sustainable development which is made up of three dimensions: economic, environmental and social.

6.10.20 The Heritage Assessment submitted with the application which gives a detailed analysis of the value and effect of the development on all heritage assets in a rigorous form; however it is indisputable that the existing setting of the Cinema Museum is poor within the site layout and built form. As existing the site sits partly within a conservation area (although the development as such sits outside the CA), contains a Grade 11 listed building in the form of the Cinema Museum, and is adjacent to the Water Tower, a further Grade 11 listed building. Despite this, the setting for the Cinema Museum, is acknowledged to be poor and the Renfrew Road CA Appraisal acknowledges the nursing home to be a negative contributor to the CA:

*To the North of the Master's House is a modern nursing home building of no architectural or historic interest.*

6.10.21 The appraisal concludes:

*However (the CA), it has a forlorn and neglected character due to the dereliction and vacancy of some buildings sites and the surrounding unsympathetic built environment. Opportunities for sympathetic re-use and redevelopment abound.*

6.10.22 In this context, any 'harm' would need to be assessed against the current situation and setting, and create a worse setting than currently exists. Harm, then can be reasonably assumed to accrue from further afield than the immediate setting, and the case that the development causes harm in this context has not been raised by the LPA or the GLA.

6.10.23 The Lambeth Tall Buildings Study (2014) acknowledges that a tall building does not necessarily demonstrate 'harm':

*Given the dense urban nature of the northern part of borough it is not unusual for existing tall building development to be visible from within conservation areas there... Visibility itself should not, in most cases, denote harm; form, materials, scale, etc. all need to be considerations. ..A balanced approach is required—the impact of existing or proposed tall development on the setting of the conservation is very much dependent on the quality of the tall building, its orientation and materials as well as the character of the conservation area.*

6.10.24 The HTVIA has been scoped and agreed with the LPA in advance, and it is acknowledged through views testing that 'less than substantial harm' would likely be caused to a number of heritage assets. For the purposes of this, the applicant has worked with the LPA to reduce 'harm' to the minimum so that there are no views in which it could be argued that the development is at the higher end of 'less than substantial harm'. In this context, the

relevant test becomes balancing the harm against public benefits. This is fully explored in the HTVIA submitted with this application.

## *Public Benefits*

6.0. 25 One of the key findings of the heritage impact assessment is that the application proposals could deliver a number of heritage (and public) benefits in national planning policy (NPPF) terms. For the purpose of this development, then the relevant public benefits are clear:

### *Securing the future of the Grade II Cinema Museum*

6.10.26 The Cinema Museum is currently run down and only intermittently open, guided tours of the museum are available most days but must be booked in advance as they're led by volunteers, and while it has an important collection of cinema memorabilia, the ability to preserve this and enable the public to view is very limited. This situation has specifically come about due to the particulars of the lease from SLAM, which has always been one year and renewed, a position which has prevented the Cinema Museum from accessing outside sources of funding, instead relying on private donors and public goodwill. The proposed development will place the Cinema Museum on a permanent footing, allowing it to fully access funding, upgrade the building and place itself on footing commensurate to its reputation. In this context there is a clear set of public benefits. This is a separate public benefit from the preservation of the Cinema Museum as grade 11 listed building, which will also accrue from this development.

### *Urban Design and Heritage*

6.10.27 CABI establishes seven principles of good design:

- Character - a place with its own identity
- Continuity and enclosure - where public and private spaces are clearly distinguished
- Quality of the public realm - a place with attractive and well-used outdoor areas
- Ease of movement - a place that is easy to get to and move through
- Legibility - a place that is easy to navigate
- Adaptability - a place that can change easily
- Diversity - a place with variety and choice

6.10.28 Further, the Mayor's Healthy Streets approach is based on ten indicators which described the experience of people using streets, with these indicators seen as essential for a healthy street environment:

- Pedestrians from all walks of life;
- People choose to walk, cycle and use public transport
- Easy to cross;
- Shade and Shelter;
- Places to stop and rest;
- Not too noisy;
- People feel safe;

- Things to see and do;
- People feel relaxed; and
- Clear air.

6.10.29 It is reasonable to state that, as existing, none of either the CABE design criteria, or the Mayoral Healthy Streets criteria, apply to the site, its layout, or its relationship to its urban setting in a meaningful way. It is notably a space that has no coherent urban character, divided between the former care home, and the Cinema Museum, with a poorly designed and laid out public realm, with no lighting, no through routes and an air of dilapidation and neglect. While, as addressed above, there is no sense in which this is a backland site within the meaning of the planning definition, there is a reason why the issue has been raised – this is a neglected site with no through route, and no coherent identity, no legibility, unsafe, and threatening. The opportunity exists through this application to embed the above principles into the site:

- Contributing to / supporting viable use of listed Master's House as Cinema Museum in the interests of long term conservation of this heritage asset. This is a key aim for the GLA and the Borough. The use currently has no status within planning legislation, having a restrictive condition, and the securing of the use for the long term future is a key public benefit.
- Securing viable future use of locally listed building group of Workhouse Porters' Lodges and Reception Building within the Site. While unlisted these are within the conservation area and part of the setting of the Master's House. At present they are vacant and semi derelict. The finding of a viable use, is a clear public benefit.
- Securing future maintenance of locally listed Workhouse Entrance Gates and Boundary Wall at south west edge of Site.
- Improvements to part of immediate setting of listed building Water Tower; creating landscape area and more attractive / functional space from where to appreciate the significance of this heritage asset. The entire setting of the Master's House and the broader Water Tower is substandard and provides no context for the buildings. The Masters House faces a badly surfaced service road, with a vacant tarmacked lot beside it, run down and overgrown.
- Improvements to immediate setting of the Master's House as a listed building through significant public realm improvements and new pedestrian links; creating a more legible and accessible urban context, directly related functional space and from where to better understand and appreciate the significance of this heritage asset. The resetting of this context and the creation of a through route, will create greater footfall opening the heritage assets to a wider
- This could be augmented with on-site heritage interpretation (model, information board, plaque, related public art etc.) to be installed as part of scheme on Site for the former workhouse use (all complex of statutory listed and locally listed buildings)
- The delivery of high quality architectural building design specifically related to its historical context and contributing to the visual attractiveness, functioning, inclusion safety and accessibility, of the Site and area through active place making. The site is

currently difficult to locate, inaccessible and provides no reason for anybody to access. The northern part of the site is intimidating and badly laid out - the quality of the public environment is low, and the access to the vacant care home poorly lit, and a negative contributor not just to the conservation area but to the basic principles of secure by design. The provision of a high quality architectural solution to this central site will contribute to the key NPPF principles, providing an appropriate setting for a heritage asset, and bringing into the public realm, in a way that is currently unachievable. The Cinema Museum, is currently perceived as something of a 'hidden gem'. Its hiddenness is not through choice, but through poor setting and environment, making it an unsettling place to visit. The structural reconnection of this site to its surrounding environment, so that other users may visit it, is a key public benefit, both for the Masters Houser and the wider urban setting.

- The delivery of high quality landscape design and planting as part of this considered place making exercise. The delivery of high quality landscape fits within both the quality of the overall design and establishment of clear public and private spaces, and the ability to create a permeable space in accordance with good design principles.
- The creation of a new pedestrian link between the site and surrounding area opens up the space and improves townscape permeability and movement.
- A high quality tall building acts as a positive visual marker to assist wayfinding and legibility within the wider townscape; drawing pedestrians to this new place and focus of activity, advertising the Cinema Museum (and its related heritage assets), reinforcing proposed new physical connections with local streets and spaces to the north, and providing a clear secure by design approach to the site and area.
- An improved setting to Masters House and use of materials sensitive to the historic context, with landscape design that evokes the heritage and workhouse history of the site through rich design detailing. A clear approach to cementing the character of the area, takes an existing undefined and poorly established part of central London and builds upon the key characteristics, creating and establishing a clear identity.
- The activated ground floor with play both creates clear spaces and recreational use in itself, and adds to the character of the site , as does the provision of access to and quality of local/doorstep play offer benefitting immediate context (policy H5)
- The existing Bellway development and its relationship with this site is poorly laid out and difficult to navigate. The creation of legible routes through the site, along with increased open space, enhances the setting to the existing Bellway residential development improving the approach to secure by design, and creating better, master planned, spaces.
- A clear hierarchy of space predominantly publicly accessible ensuring an improvement to the quality/quantum of outdoor amenity space that is pedestrian only (taking precedence over vehicular access and parking)
- Improved urban greening and biodiversity of the site through new tree and shrub planting Designing with existing trees and integrating them into the overall landscape strategy further benefitting the setting

- Improved biodiversity of open space that supports local habitats and creating green links. Creation of convenient/attractive access for pedestrians and cyclists.
- The site has been designed as car-free and has been designed to prevent vehicles from rat-running through the site through proposed bollards and landscaping. This therefore allows for a pleasant, landscaped public realm within the site. In addition, informal pedestrian and cycle routes will be created throughout the site increasing the permeability of the site.
- Inclusive access to the site is currently substandard, the new public realm has been designed to consider the needs of all pedestrians. This has been achieved by designing footways with an effective width to account for multiple pedestrians including those who are physically impaired and may require more space to move through the site. In addition, design consideration has been given to those using different methods of movement such as scooting or skateboarding.
- The design of the public realm within the site is smooth and flat to allow for easy navigation for those who may be physically impaired or older generations, reducing the risk of falling.
- The proposals will greatly improve the overall public space, creating a pleasant and well-connected environment.
- Tree planting and landscaping will be provided within the site creating shade for pedestrians and cyclists on hot and sunny days and also allow for sunlight during the winter months.
- The high-rise flats will also act as a barrier from high winds, therefore making the environment more pleasant to walk through in bad weather.
- The overall development and the local urban realm improvements has been designed with future pedestrians and cyclists at the forefront. The development proposes to be car free in line with planning policy, therefore reducing unnecessary motorised traffic

6.10.30 There are, then, substantial urban design and heritage public benefits accruing from the development. The harm, against which this is assessed, has been minimised within the view setting of the conservation areas, and, through a detailed analysis of the historic context, and setting; the development actively enhances the settings of the key heritage assets in the form of the Water Tower and the Masters House, both of which derive no benefit from their current settings. The placemaking benefits accruing from this development are substantial and fit in with the definition of public benefit with all of the above tests.

6.10.31 These are substantial public benefits and a key Mayoral priority, and sit clearly within the definition of public benefit as established by NPG, specifically meeting the following three tests:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation*

## *Social and Environmental*

6.10.32 Paragraph 8 of the NPPF specifically allows social benefits to be included in the weighting exercise. The proposed development provides 50% affordable housing. London Borough of Lambeth has recently updated its SHMA (2017) as part of the evidence base for the Local Plan Review.

6.10.33 For the purposes of the SHMA, a household is considered unable to afford market housing if they would either need to spend more than 3.5 times their gross household income to buy a property, or more than 30% or 40% of their income to rent a property.

6.10.34 Home ownership costs more than renting, therefore it is entry to the private rented sector that is considered the ability to afford market housing.

6.10.35 Affordable housing need over the plan period comprises backlog need plus newly arising need. The calculations in the SHMA show that, based on households spending 40% of their gross household income on rent, the need for affordable housing over the 20 year plan period is 1,047 net additional homes per year, while if households spend 30% of their gross household income on rent, 1,573 affordable homes are needed per year.

6.10.36 The SHMA also considers the relative affordability of different types of intermediate affordable housing products to Lambeth residents. The proposed development provides both social rented and shared ownership affordable products. Shared ownership schemes allow occupiers to buy a proportion of their property (usually between 25% and 75% of the full price) and pay rent on the remainder. There were very few shared ownership homes advertised at the time of the SHMA (June 2017) that can be accessed at less than the amount required to enter into the private rental market. Data from the GLA provides us with the median incomes of the 204 households that bought shared ownership homes over 2015-2016. There is relatively little difference between the median incomes of those purchasing through shared ownership, and the income required to access the lower quartile of the private rented market.

6.10.37 In line with national and regional policy, and paragraph 8 of the NPPF, the provision of housing is, in itself, a public benefit, and the provision of 50% affordable housing adds substantial additional weight by achieving and contributing to the three core aims of relevant social and environmental test:

- *an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure*
- *a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being*

- *an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

6.10.38 The proposed development will also landscape and provide additional ecological and biodiversity benefit to a largely developed brownfield site; providing clear environmental benefits.

6.10.39 The provision of 50% affordable housing is a clear public benefit within the meaning of the guidance. In addition the development provides improved connectivity within and around the Elephant and Castle, creates a high quality built environment, and brings forward an underused brownfield site, additionally the development will contribute to the local economy throughout the construction period, and through the multiplier effect of economic regeneration.

**Affordable Housing**

6.11.1 London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing. The Mayors’ Affordable Housing and Viability SPG establishes a minimum pan-London threshold level of 35% affordable housing (without grant) with a strategic target of 50%. The SPG approach is formalised within draft London Plan Policies HS, H6 and H7. Draft London Plan Policies H5 and H6 introduce a specific threshold level for development on public sector land where there is no portfolio agreement with the Mayor, which is set at 50% affordable housing. Lambeth’s Local Plan H2 sets a 50% affordable housing target where subsidy is available and 40% without public subsidy with a tenure mix of 70% of new affordable housing units as social and affordable rent and 30% as intermediate.

6.11.2 The policy also recognises that LBL will take into account the specific circumstances of the site and viability when considering the contribution towards affordable housing. It states a financial appraisal will be required if the affordable housing provision is less than the specified policy requirements or where the proportions of affordable rented and/or intermediate housing are not in accordance with policy which is consistent with London Plan Policy 3.12.

6.11.3 The proposed unit mix comprises:

Tenure	Units (% of total)	Habitable Rooms (% of total)
Private	145 (56%)	290 (50%)
Intermediate	89 (35%)	201 (35%)
Affordable Rent	24 (9%)	90 (15%)
<b>Total</b>	<b>258</b>	<b>581</b>

6.11.4 The proposed affordable contribution comprises:

Tenure	Habitable Rooms (% of total / % of affordable)
Affordable Rent	90 (15%/31%)
Intermediate	201 (35%/69%)
<b>Total</b>	<b>291 (50%)</b>

6.11.5 A full viability assessment is submitted with the application. This takes a rigorous approach to establishing Benchmark Land Value, and is clear about the underlying viability assumptions being tested. The scheme then, by habitable room, meets the headline target affordable contribution. This is then further rigorously tested against the tenure mix to demonstrate the maximum affordable provision is being provided at the relevant tenure mix.

6.11.6 The council will undertake an independent review of the viability of the scheme and this will be discussed with the council and the GLA during the application process. Any requirements for affordable housing provision and other planning obligations will be secured through a S.106 legal agreement which will be completed with the grant of planning permission.

### Dwelling Mix

6.12.1 The proposed development comprises the following Unit Mix:

	Unit	Total	Hab/Room	% Unit Mix
Affordable Rent	Studio	0	0	0.0%
	1B/2P	0	0	0.0%
	2B/3P	0	0	0.0%
	3B/5P	9	45	3.5%
Intermediate	Studio	0	0	0.0%
	1B/2P	66	132	25.6%
	2B/3P	23	69	8.9%
	2B/4P	0	0	0.0%
Private	Studio	27	27	10.5%
	1B/2P	91	182	35.3%
	2B/3P	27	81	10.5%
	2B/4P	0	0	0.0%
<b>TOTAL</b>		<b>258</b>	<b>581</b>	<b>100.00%</b>

6.12.2 The context is provided by Draft London Plan Policy H12 Housing size mix, which establishes a mix of unit sizes assessed against relevant criteria:

- *the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment and, where available, by evidence of local needs*
- *the requirement to deliver mixed and inclusive neighbourhoods*
- *the need to deliver a range of unit types at different price points across London*
- *the range of tenures in the scheme*
- *the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in urban locations which are closer to a town centre or station or with higher public transport access and connectivity*
- *the aim to optimise housing potential on sites*
- *the ability of new development to reduce pressure on conversion and, subdivision and amalgamation of existing stock*

- *the role of one and two bed units in freeing up family housing*

6.12.3 This specifically states that boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes. For low cost rent boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs.

*“Boroughs should not set policies or guidance that require set proportions of different-sized (in terms of number of bedrooms) market or intermediate units to be delivered. Such policies are inflexible, often not implemented effectively and generally do not reflect the optimum mix for a site taking account of all the factors...Moreover, they do not necessarily meet the identified need for which they are being required; for example, larger market units are often required by boroughs in order to meet the needs of families but many such units are instead occupied by sharers”*

6.12.4 Mayoral Note M28 Housing Size Mix produced for the EIP elaborates on this position,

*The supply of new market and intermediate homes must be responsive to market signals to deliver a range of housing sizes across London at different price points. Requiring the delivery of a fixed proportion of certain sized market or intermediate units without an understanding of a site’s specific characteristics would slow down delivery in instances where there is no, or very limited, demand for that product in that location and at that price point. Demand for larger market and intermediate units will be lower in locations where fewer people seek family housing or where the price of larger homes would limit the pool of potential buyers... First time buyers of both shared ownership and market homes with average incomes are typically unable to afford larger homes in many parts of London without significant deposits. For all of these reasons, prescriptive size mix requirements for market and intermediate homes would therefore have a negative impact upon the viability and deliverability of schemes. The emphasis on demand in the 2012 NPPF supports the position that policies should not set prescriptive dwelling mix requirements for market products*

6.12.5 The clear thrust of policy in the Draft London Plan (and its Minor Modifications) goes further than merely stating that boroughs should not set policies or guidance that require set proportions of different-sized market or intermediate units to be delivered, into fully justifying why - linked to affordability, demand, location, downsizing, and, that within the demographics of London, two bedroom units *are* a family units.

6.12.6 Local Plan Policy H4 states that the affordable housing element of residential developments should reflect the preferred borough-wide housing mix for affordable rented and intermediate housing as set out below:

- 1-bedroom units: not more than 20%
- 2-bedroom units: 20-50%
- 3-bedroom+ units: 40%

6.12.7 Lambeth's policy in relation to private housing is more subjective, with Policy H4 requiring a balanced mix including family sized accommodation. The policy does state that rigid application of these requirements may not be appropriate in all cases and that the council will have regard to individual site circumstances including location, site constraints, and the achievement of mixed and balanced communities. In all cases, proposals will be expected to demonstrate that the provision of family-sized units has been maximised.

6.12.8 This has been modified in the draft Local Plan to reflect the most recent SHMA (2017), and the Draft London Plan, so that a specific requirement only applies to low cost rented:

- 1 bedroom units not more than 25%
- 2 bedroom units 25 – 60%
- 3 bedroom units at least 35%

*“For market and intermediate housing, a balanced mix of unit sizes including family-sized accommodation should be provided.”*

6.12.9 The overall approach then, is to achieve a skew towards larger family units (two/ three bed) in the social rented accommodation, while assessing need, demand and cost, in the intermediate/ market accommodation. In the circumstances, while neither the Draft London Plan nor the Draft Local Plan are adopted, it reasonable to use their approach to assess the application.

6.12. 10 In the provision of low cost rented the proposed dwelling mix fully complies.

6.12. 11 It has been held at appeal (APP/N5660/A/11/2152613) that two bedroom units, are suitable for a family and can be treated as such. This is particularly the case in central sites. As above, the Draft London Plan builds on this to broadly include 2 bedroom units as family accommodation, and to acknowledge that in parts of London 3 bed units as an intermediate/ market product effectively don't work and have little demand.

6.12.12 The site is in Princes Ward. This has a high population density; the ward has a high number of household spaces, 85% of which are flats. Almost half - 47% - of households are social rented, and there is the lowest rate of private renting (20% of households). Home ownership is average for Lambeth at 27%. Nearly 40% of dwellings in council tax bands A or B, which is high. The Lambeth Joint Strategic Needs Assessment (2015) shows that Prince's Ward has a significantly lower than average proportion of 0 – 19 year olds and significantly higher 40 – 65 and 65+.

6.12.13 This suggests a lower proportion of projected demand for larger family accommodation in the ward, and this is borne out by the SHMA (2017). Overall the SHMA projections suggest that, by 2036, 24 percent of households in Lambeth will have one or more dependent child, within which there will be a 19.2 per cent increase in the number of households with one child, with a much smaller projected increase in the number of families with 2 or 3+ children. This underpins the demand for two bed units, with limited demand for 3 bedrooms and above, particularly when linked to market affordability.

6.12.14 The SHMA further picks up under-occupation rates as being much higher than overcrowding rates, Prince's ward specifically has one of the highest under occupation rates (as indicated by an excess of one bedroom or more). This suggests, as per the London Plan, that there is significant capacity for downsizing across Lambeth, but in the Princes ward in particular.

6.12.15 It is further identified that over 80% of Lambeth households are 3 person or below, and while this isn't broken down by ward, it reasonable to assume that, particularly in the intermediate and market sector, the vast majority of households containing greater than 3 people are in the southern, more suburban, part of the borough.

6.12. 16 The London Plan goes on to specifically link unit mix to market affordability:

*Given that the median gross annual household income is around £37,000, family sized homes particularly in Inner London, are likely to be affordable to only a small minority of households.*

6.12.17 It is within the context of all the above that the SHMA (2017) highlights the mix of different dwelling sizes required within the borough through an analysis of projected household growth, indicating that the highest proportion of market housing need relates to 2 bed and studio/1 bed units.

6.12.18 In terms of affordable housing, it is noted that the highest proportion of need not met, and highest number required, is for 2 bed units (86.7%). The proposed affordable housing mix which provides 57% affordable 2 bed units is therefore in line with the latest Strategic Housing Market Assessment.

In this context the proposed dwelling mix meets all the relevant policy tests.

## **Design**

6.13.1 The architectural design and massing responds to the Site's local and historic context and a full Design and Access Statement is included with the application. A range of options were explored as part of the approach to the site and the resultant scheme is based on a detailed analysis of the historic layout of the site, the surrounding urban typology, and a rigorous approach as to how the site might better achieve the aims and aspirations of an inner London site.

- A variety of alternative arrangements were explored early in the design process.
- A taller building in the centre of the site identified as the most appropriate solution striking an appropriate balance between optimising the development density and potential of the site whilst respecting the boundary conditions with neighbouring properties and heritage assets.
- The principle of a point building in the centre of the site was supported in principle at Lambeth Officer level, and by the GLA

- In order to determine the appropriate height VU.City analysis was undertaken by the Design Team and Lambeth Officers, together with an initial HTVIA Assessment presented to the Lambeth, the GLA and Historic England. A range of 10-35 storeys was tested.
- As part of the Visual Assessment analysis was undertaken on proportion and slenderness ratios, together with the impact of floor plate size (new homes provision), efficiency and the effect on height.
- The top of the building was articulated to make a positive contribution to the skyline, a step down was introduced and tested at a variety of heights. The taller element of the building was relocated in response to comments on the views from the Conservation Area, creating a physical step down in height and scale to the north / north west.
- The base of the building was articulated and amended to reinforce transition in scale and create a legible pedestrian route to the Cinema Museum.
- Initial proposals suggested a height of 35 storeys. Upon review of all the above analysis and design development the building has been reduced in height with the tallest element 29 storeys and the stepped element 24 storeys.

## **Residential Amenity**

6.14.1 The Draft London Plan and Mayors Design Guide SPD establish expectations for housing quality and amenity, and these standards are essentially replicated in the Lambeth Local Plan and Draft Local Plan revisions.

6.14.2 These have been embedded in the design process from the earliest stages and are fully explored in the DAS. Key issues which have been considered throughout the design development of the proposals include unit sizes, the minimising of single aspect units, adequate levels of privacy and sufficient levels of daylight and sunlight to habitable rooms.

6.14.3 Policy S4 of the DLP sets standards for informal play space, for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child.

## **Wheelchair Accessible Housing**

6.15.1 At least ten percent of all units within Block B are wheelchair adaptable and have been designed to meet Part M (4)3 standards. The wheelchair adaptable units are spread across both tenures with varying unit sizes to reflect the overall the mix and tenure of building. This constitutes 10% of the total number of dwellings in line with London Plan Standards.

6.15.2 The requirements, layouts and locations of the wheelchair user dwellings are outlined in the Design and Access Statement.

## Daylight and Sunlight

6.16.1 This assessment has been undertaken in accordance with the BRE document ‘*Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice*’ 2011 (the BRE Guidelines), which is the principal guidance on daylight, sunlight and overshadowing.

5.16.2 The BRE Guidelines offer advice on site layouts to provide good natural lighting within new developments and the safeguarding of daylight and sunlight within existing buildings. Due to its national application, this framework for designers, practitioners and planning officials is very much a ‘one size fits all’ approach and is applicable to a variety of built environments, which range from low rise market towns in the home counties, to urban locations, to areas where significant urban regeneration is taking place.

6.16.3 The BRE Guidelines repeatedly acknowledge the shortcoming of the ‘one size fits all approach’ and encourages the user, whether that be designers, consultants or planning officials to apply the guidelines in a manner that is appropriate for a particular situation. For example, in the introductory summary it states:

*“This guide as a comprehensive revision of the 1991 edition of site layout planning for daylight and sunlight. It is purely advisory and a numerical target value may be varied to meet the needs of the development and its location. Appendix F explains how this can be done in a logical way while retaining consistency with the British Standard Recommendations on interior lighting.”*

6.16.4 In Section 1: Introduction, at paragraph 1.6 it states:

*“the guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of the many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values. For example, in historic city centres or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.”*

Finally, in Appendix F it states at section F1:

*“Sections 2.1 and 2.2 and 2.3 give numerical target values in assessing how much light from the sky is blocked by obstructing buildings. These values are purely advisory and different targets may be used on special requirements of the proposed development or its location.”*

6.16.5 Therefore, it is clear that the numerical advice offered by the BRE is not mandatory and that a practical application of the target values is required as natural lighting is only one of many factors that should be considered.

*National Planning Policy Framework (2018)*

6.16.6 The recently updated National Planning Policy Framework 2018 ('NPPF') makes reference to the need for local authorities to adopt a flexible approach when considering daylight and sunlight impacts:

*"local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)." (page 37, 123,(c))*

*The Mayor of London - Housing Supplementary Planning Guidance (March 2016)*

6.16.7 The Mayor published a Supplementary Planning Guidance (SPG) on Housing in March 2016, which sets out the policy framework for development in London and provides guidance on strategic policies such as: housing supply, residential density, housing standards and build to rent developments. Kennington Stage Daylight, Sunlight and Overshadowing Report April 2019 Page 12

6.16.8 The Housing SPG suggests that the rigid application of the BRE Guidelines is not appropriate in higher density areas:

*"An appropriate degree of flexibility needs to be applied when using BRE Guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time." (1.3.45)*

6.16.9 It goes on to state:

*"The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm." (1.3.46)*

*Housing White Paper: Fixing Our Broken Housing Market (Department for Communities and Local Government, February 2017)*

6.16.10 This White Paper sets out how the Government seek to use land more efficiently for development. Paragraph A.69 of the Housing White Paper states that:

*"the Government intends to amend national planning guidance to highlight planning approaches that can be used to help support higher densities, and to set*

*out ways in which daylight considerations can be addressed in a pragmatic way that does not inhibit dense, high quality development.” (A69)*

6.16.11 It is evident that national and local planning policy seeks to acknowledge the need for greater flexibility when applying daylight and sunlight guidance, particularly in areas of designated growth and where housing demand is greater. By reviewing not only the relative change in daylight and sunlight levels following the implementation of a proposed development, but also the levels of daylight and sunlight that would be retained, it is our view that these provide a sound basis to determine whether the actual impact on amenity can be considered harmful and just as importantly whether the retained levels of amenity is relevant for the context within which the site is located.

6.16.12 The NPPF places particular importance on planning policies and decisions avoiding homes being built at low densities, ensuring that developments make optimal use of the potential of each site (para123) and to facilitate this states that

*“in this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.”*

6.16.13 In this context, the characteristics of the existing site are of fundamental importance in assessing daylight and sunlight effects. While being a sizeable, as existing the site is low-rise and in the most part, completely undeveloped. As a result, the majority of the existing levels of daylight and sunlight within the surrounding residential properties looking over the site are very high and more akin to what one would expect in a village environment as opposed to central London. The site is therefore somewhat unique in that regard.

6.16.14 It is almost always the case that when replacing largely undeveloped sites such as this with higher density developments, there will be daylight and sunlight reductions which exceed the national advice offered by the BRE Guidelines. A rigid application of the BRE Guidelines to this site would in our opinion be at odds with the approach adopted by local authorities across London, and indeed Lambeth, where it is recognised that a flexible approach is required, taking into account other factors such as the context within which the site is located along with housing demand etc, It would produce an unviable quantum of massing and prevent the delivery of much needed residential accommodation on this site.

6.16.15 We therefore believe it is appropriate to consider not only the relative change between the existing and proposed daylight and sunlight levels, but also examine the daylight and sunlight amenity that the neighbouring properties will retain with the development in place.

6.16.16 The results demonstrate that 585/827 (71%) of the windows assessed for VSC will adhere to the BRE Guidelines. In terms of NSL, 500/522 (96%) will adhere to the BRE criteria. Finally, 295/305 (97%) rooms will adhere to the BRE Guidelines for sunlight.

9.16.17 These results demonstrate a good level of compliance for a tall building in central London. The alterations in daylight mainly occur to windows that have unobstructed views across the site and so the breaches of guidance are not unusual in the circumstances. While

there are a number of properties surrounding the site that experience breaches in the BRE Guidelines for VSC the vast majority (60%) retain a VSC above 20%. This is not an uncommon quantum of skylight for properties adjacent to development sites in London, albeit, it is below the nationally applicable recommendations set out in the BRE Guidelines.

9.16.18 In addition, there are a number of properties surrounding the site that contain overhanging eaves meaning that the windows and rooms below are sensitive to changes in massing on the site and experience disproportionately large percentage reductions. In most cases these windows/rooms would either adhere to the BRE Guidelines or retain levels that we would consider to be very good for London. meaning that their own architectural features are partly to blame for some of the loss of daylight and sunlight amenity.

6.16.19 The recently updated NPPF 2018, as well as the Mayor of London's Housing SPG recognise the need for local authorities to adopt a flexible approach when considering daylight and sunlight effects to neighbouring properties where they would otherwise inhibit making efficient use of a site.

9.16.20 Daylight and sunlight is one of many planning considerations and should be reviewed in conjunction with the benefits that the development provides. In our opinion, whilst there are some breaches in guidance to many of the properties surrounding the site if rigidly applied, they generally retain a good level of daylight which is commensurate with a London development site.

## **Dual Aspect**

6.17.1 Draft London Plan Policy D4 states that applications should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D1 London's form and characteristics than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

### *The Lower Building*

6.17.2 This contains the affordable rent units for the proposal. The typical floor plate has eight units arranged around a single core with 50% of the units being dual aspect and zero north facing single aspect units. The building has an east to west orientation, meaning all of the units will receive direct sunlight.

### *The Point Building*

6.17.3 The taller building will contain a mixture of intermediate and private accommodation with a typical floor plate of nine units per floor. The building has been designed with the longer façades facing east and west to maximise sunlight and the shape of the floor plate allows for 6 of the units to be dual aspect, without any single aspect north facing units.

6.17.4 Policy H5 of Lambeth Local Plan states that dual aspect dwellings should be provided unless exceptional circumstances are demonstrated and this is carried forward into the Review.

6.17.5 A mix of single and dual aspect dwellings has been widely accepted on other schemes where there is appropriate design considerations (Key Bridge House, Tesco's Kennington Lane) where it can be shown that the number of dual aspect dwellings has been maximised.

## **Landscaping Strategy**

6.18.1 Policy Q9 of Lambeth Local Plan states that Development will be supported where landscaping:

- is fit for purpose and demonstrates that satisfactory provision has been made for future growth and aftercare;
- retains and enhances existing planting and landscape features of value and protects them during construction;
- protects and enhances existing designated habitats and creates new habitats/areas of nature conservation interest and biodiversity value;
- maximises opportunities for greening, such as through planting of trees and other soft landscaping;
- makes use of plant species that are in keeping with the character of the existing vegetation on the site and in the general area;
- takes into account established or potential pedestrian and cycle desire lines and suitably accommodates them; (
- provides strong boundary treatments, including trees and shrubs where appropriate
- avoids piecemeal treatments and leftover spaces;
- provides means of access routes and or parking areas which are compliant with highway safety requirements and minimum parking space standards;
- is attractive and well designed, taking a co-ordinated approach with any adjoining landscaping schemes; and
- Provides sustainable drainage and minimises surface run-off.

6.18.2 Details of the Landscaping Strategy are contained within the Landscape Design Statement produced by Farrah Huxley, which is submitted in support of the application. An overall strategy has been produced, which creates a number of areas to produce a coherent overall approach, underpinned by sound urban design principles, and linked into the other site wide strategies, including servicing and SuDS. The site is masterplanned with both private and shared residential gardens, character spaces responding to the heritage, servicing, and permeability needs of the site, along with a clear definition of private and public spaces and pedestrian legibility.

## **Private Amenity and Communal Amenity**

6.19.1 As set out in the submitted schedule of accommodation, some of the affordable rented accommodation will have access to private garden space. All residential accommodation has been modelled with access to amenity space (in the form of balconies) which meet the London Plan standards set out in the Housing SPG and Draft London Plan. The balconies are expressed as increased internal space, and this is explored below.

6.19.2 The shared amenity space is divided into character areas, comprising ‘residential back gardens’, ‘central court’, ‘Museum Court’, ‘Entrance Yard’, each with their own function, materials and planting schedule.

## Children’s Play

6.20.1 In calculating the amount of child play space, the GLA’s child play space calculator has been used to determine the quantum which is apportioned to under 5s, ages 5-11 and 12 plus; this take into consideration the tenure of the units.

6.20.2 The play strategy follows the approach outlined in the Mayor’s SPG which stresses “a new approach: from play areas to playable spaces”. This guidance also states:

*“where open space provision is genuinely playable, the open space may count towards the play space provision”.*

6.20.3 Lambeth Local Plan links across to the London Plan for the purposes of play space. Policy H5 of the London Plan SPG requires 10sqm dedicated play per child, with outdoor amenity space taking precedence over parking provision. The SPG requires:

- |                            |                   |
|----------------------------|-------------------|
| • Doorstep (under 5)       | 229m <sup>2</sup> |
| • Neighbourhood (5-11)     | 150m <sup>2</sup> |
| • Youth (12+)              | 107m <sup>2</sup> |
| • Total Dedicated Required | 486m <sup>2</sup> |

6.20.4 Following this ethos the entire public realm will be ‘playful’ - it is not the intention to provide a definite playground with equipment, fencing and safety surfacing. Rather areas of dedicated play for children under 5 and from 5 to 12+ years will be integrated within the main communal yard spaces with playable objects and spaces for incidental play threaded into the public realm.

6.20.5 Play features will be in the form of bespoke installations that assimilate the sites design language and built materials.

6.20.6 The site is within close proximity of St Mary’s Churchyard play area with 12+ play offer located within a 400m radius. This enables older children to easily access large areas of open space and age-specific play provision.

6.20.7 Aspects integrated into the public realm to encourage incidental play include:

- Shared surface ‘streets’ maximise open space so children can run about or play ball games
- Level changes will be highlighted by steps and low walls which stimulate physical play
- Safe walking and cycling routes
- Landscaping details and public art will contribute to the play offer
- Sensory and colourful planting with turfed areas and sensory shrub planting

6.20.9 Aims of the play strategy include:

- Provision of play offer to support local and neighbourhood play within the immediate neighbourhood
- Mixture of formal and incidental play and recreation opportunities for all ages
- Increasing the quantum and access to quality play and open space for the immediate neighbourhood

6.20.10 The following table sets out the required play space for the proposed mix and tenure:

Assessing child occupancy and play space requirements							
Size of your development:							
Number of FLATS							
	Studio	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Social rented/affordable	0	0	15	9		0	24
Intermediate	0	66	23	0		0	89
Market	27	91	27	0		0	145
<b>Total</b>	<b>27</b>	<b>157</b>	<b>65</b>	<b>9</b>		<b>0</b>	<b>258</b>

Number of HOUSES							
	1 bed	2 bed	3 bed	4 bed	5 bed	Total	
Social rented/affordable	0	0	0	0	0	0	
Intermediate	0	0	0	0	0	0	
Market	0	0	0	0	0	0	
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	

Proportion of children		
	Number of children	%
Under 5	19	48%
5 to 11	12	31%
12+	8	21%
<b>Total</b>	<b>40</b>	<b>100%</b>

Play space requirements		
GLA benchmark (sqm)*	Alternative local benchmark (sqm)**	Total (sqm play space) required
10		399.1
		0.0

\* GLA benchmark standard=minimum of 10sqm of dedicated play space per child  
 \*\* Borough's local benchmark

6.20.11 In this context the areas required by SPG comprise:

- Doorstep (under 5) 191 m2
- Neighbourhood (5-11) 123 m2
- Youth (12+) 84 m2
- Total Dedicated Required 399 m2

6.20.12 The proposed development, then, provides:

- Doorstep (under 5) 336 m2
- Neighbourhood (5-11) 128 m2
- Youth (12+) 208 m2
- Total Dedicated Provided 672 m2
- **Total multi-functional/Incidental (all ages) 1710 m2**

6.20.13 A design based approach has been taken to the provision of play space to ensure that it works to the benefit of the residents. Each age range has been approached with a design intent and a set of outputs to maximise the usability and flexibility of the play space:

6.20.14 Location of dedicated under 5's play will provide:

- Good natural surveillance
- High daylight/sunlight
- Spaces that offer places for parents and supervisors to sit and watch, have a coffee
- Spaces with tree planting for shade
- Spaces that have a sense of partial enclosure and do not conflict with main thoroughfares

Design intent:

- Bespoke play items that are part of a wider suite of site furniture and play elements that draw upon the concept of cinema and film

6.20.15 Location of dedicated 5-11 play will provide:

- A mixture of playful and sociable spaces
- Level changes and elements that provide opportunity for risk taking
- Opportunity for children to push themselves around comfort zones relating to risk
- Adjacency to 12+ play zone for children who can be challenged more (or within older age bracket)
- Elements of climbing, jumping so on - could be introduced through use of wall elements, undulations within the landscape

Design intent:

- Bespoke play items that are part of a wider suite of site furniture and play elements that draw upon the concept of cinema and film

6.20.16 Location of dedicated 12+ play will provide:

- Levels of risk and challenge
- Places to sit and socialise with a variety of ages
- Accessible to a range of ages
- An area of flexible space for ball games and other events
- Use of lighting so it is safe to use in the evening; acts as a meeting point
- Located centrally to the site away from boundaries to existing properties

Design intent:

- Bespoke play items that are part of a wider suite of site furniture and play elements that draw upon the concept of cinema and film
- Context/heritage sensitive; could have a public art element.

## Balconies Strategy

6.21.1 External amenity space in tall buildings is rarely well-used due to user preference and varying wind conditions at upper floors. There is an increasing preference by occupiers of these properties to have those amenity spaces enclosed, with openable windows, to give a greater perception of safety and comfort. It is therefore proposed that the amenity space is internalised in addition to the apartment area with both the amenity space and apartment to be provided to meet all relevant space standards.

6.21.2 Lambeth Local Plan (and revision) acknowledges that where it is demonstrated that site constraints make it impossible to provide private open space for all dwellings in flatted developments, the provision of additional internal living space equivalent to the amenity space requirement within a proportion of dwellings may be accepted.

6.21.3 The Draft London Plan is silent on the principle merely stating that:

*All dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony. The use of roof areas, including podiums, and courtyards for additional private or shared outside amenity or garden space is encouraged*

6.21.4 However the approach has been accepted elsewhere, where justified by design, and within the context of the space being additional to the internal living space and meeting the equivalent standard.

## Highways and Transport

6.22.1 The London Plan emphasises the importance of creating strong and sustainable transport infrastructure to allow convenient, universal access to jobs, opportunities and facilities. The Plan is accompanied by the Mayor's Transport Strategy (MTS) which sets six thematic goals for the provision of transport:

- Supporting economic development and population growth
- Enhancing the quality of life for all Londoners
- Improving safety and security of all Londoners
- Improving transport opportunities for all Londoners
- Reducing transport's contribution to climate change and improving its resilience
- Supporting delivery of the London 2012 Olympic and Paralympic Games and its legacy.

6.22.2 This has now been updated (March 2018) with particular focus on 'healthy streets'.

6.22.3 The aim of the approach is to establish a London where walking, cycling and green public transport become the most appealing and practical choices for many more journeys. In this context, development proposals should support and facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041 and all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling

routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

6.22.4 Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Policy T2 states:

*Development proposals should:*

*1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance.*

*2) reduce the dominance of vehicles on London's streets whether stationary or moving.*

*3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.*

6.22.5 Adopted Policy 6.1 of the London Plan outlines how the Mayor will work with stakeholders across the city to encourage a closer integration of the transport network. Developments which encourage patterns and reduce the need to travel will be supported. Furthermore, proposals which seek to reduce the reliance on the private car and utilise public transport facilities will be preferable. Proposals which generate a high number of trips around public transport nodes are recognised as a more sustainable approach to development within the city. Improvements to urban realm and increasing accessibility across and within new developments will be supported as they contribute to facilitating walking as a means of transport around the city.

6.22.6 The close co-ordination of land use and transport planning is crucial to delivering the sustainable goals outlined in the NPPF and supported at the London-wide and borough level.

6.22.7 Lambeth's Local Plan outlines how sustainable transport initiatives will be implemented across the borough. Policy T1 states that LBL will promote sustainable development within the borough with the aim of minimising the need to travel by car and thus reducing the reliance on the private car. LBL suggests a transport hierarchy which will be referred to when considering development proposals. The hierarchy, presented in declining order is shown below:

- Walking
- Cycling
- Buses
- Taxis and minicabs
- Motorcycles/scooters
- Freight transport
- Cars

6.22.8 This policy goes on to state that development that generates a significant number of trips will be required to be located in an area with an appropriate level of public transport accessibility and where public transport capacity can accommodate the proposed increase in

number of trips, or where capacity can be increased to an appropriate level. Separate to the generalised optimising density, as a locational policy, this appears to be the sole policy that specifically links appropriate levels of development to the transport network. As would be expected, there are no locational policy requirements that differentiate *within* highly public accessible sites to link density and quantum to a specific relationship with the hierarchy of the road network. Any such approach, would, in effect link to density to road network access and be contrary to the provisions of the Local Plan, the London Plan and the Draft London Plan.

6.22.9 The Draft Local Plan Review essentially takes the approach forward, incorporating Healthy Streets.

6.22.10 The proposed development will be car-free. This is in accordance with the adopted London Plan parking standards, which states that “...all developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit”.

6.22.11 Based on these standards and given the accessibility of the site (PTAL 6a/6b) it is considered appropriate for the development to be car-free.

6.22.12 In accordance with the emerging draft London Plan standards, the development will provide 9 Blue Badge spaces; 4 of these spaces will be accessed via Dante Road whilst the other 5 spaces will be accessed via Renfrew Road. In addition, a Parking Management Plan will be included as part of the Framework Travel Plan. This will set out how the Blue Badge parking spaces will be managed and controlled.

6.22.13 The management team of the development will ensure Blue Badge permits are displayed clearly within vehicles parked within these 9 Blue Badge spaces, ensuring these spaces are used in accordance with regulations.

6.22.14 With regard to cycle parking, the development will accord with the draft London Plan parking standard, which are summarised below:

Land Use		Long-stay		Short-stay	
		Standard	Requirement	Standard	Requirement
C3-C4 Dwellings	Studio	1 space per unit	27	1 space per 40 units	9
	1-bed	1.5 spaces per unit	236		
	2+ bed	2 spaces per unit	148		
		<b>TOTAL</b>	<b>411</b>	<b>TOTAL</b>	<b>9</b>

6.22.15 Based on these standards, the proposed development is required to provide a minimum of 411 long-stay cycle parking spaces and a minimum of 9 short-stay spaces and these are provided.

6.22.16 The long-stay cycle parking spaces will be sheltered and secure and will be located within the ground floor of the proposed buildings. The short-stay spaces will be located throughout the site and will be provided in the form of Sheffield stands.

6.22.17 A full Transport Assessment has been produced by Vectos, including a road safety audit and trip generation analysis.

### *Travel Plan*

6.22.18 A Travel Plan has been submitted with the application; this will include a welcome pack and the following:

6.22.19 New residents will be provided with a Welcome Pack containing information on public transport services close to the site and other measures for encouraging use of non-car modes of travel.

- A summarised version of the Travel Plan Statement document, that sets out the purpose and benefits etc;
- Timetables and route maps for public transport, particularly London Underground;
- Contact numbers and web details for the TfL Journey Planner, National Rail Enquiries, and journey planning apps, such as Citymapper;
- Local taxi company details;
- Local Car Club information;
- Cycling and walking maps for the local area;
- Web details for any community travel sites and community forum sites;
- Web and other contact details for major retailers offering home shopping facilities; and
- Contact details for Car Sharing schemes.

6.22.20 The TPC will also seek to ensure that pedestrian routes to / from the site are appropriately maintained and residents are aware of strategic routes to key destinations, and promote the health benefits of walking and explore the possibility of using such schemes as '10,000 steps a day campaign.' Residents will be provided with information and advice concerning safe cycle routes to the site.

6.22.21 Up-to-date details of bus and rail services, including route information and service frequencies, will be provided as part of the resident Welcome Packs. National Rail and TfL Journey Planner websites and enquiry phone numbers will be advertised through all relevant means. In addition, apps such as Citymapper will be advertised. Contact details for local taxi operators will be available within Welcome Packs. The TPC will liaise with LBL and TfL to ensure that issues periodically raised by residents are considered.

6.22.22 The proposed development will be car-free. This is in accordance with the adopted London Plan parking standards, which states that "...all developments in areas of good public

transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit”.

## Access and Servicing

6.23.1 Policy Q12 of the Council’s Local Plan seeks to ensure that adequate refuse and recycling storage is provided for developments. It goes on to say the in new-build schemes refuse storage areas should:

- be fully integrated into the building and placed close to the main entrance for ease of use; or be separate - located well away from residential accommodation to avoid harm to amenity and outlook;
- have a water supply to allow for wash down;
- be naturally ventilated; preferably with robust metal framed louvered doors; and
- Where necessary, especially where the storage is integrated within the building, mechanical extraction should be provided in order to effectively deal with odour.

6.23.2 Policy EN7 deals with Sustainable Waste Management which sets out the Council’s commitment to supporting the approach to drive waste management up the waste hierarchy in accordance with national and regional policy targets.

6.23.3 Policy T8 deals with servicing and waste collection requirements for new developments stating that: *‘Servicing, including waste collection facilities, must be provided on-site and vehicles must be able to pull clear of the public highway without causing obstruction, unless it is clearly demonstrated that it cannot be accommodated and adequate justification is provided for this.’*

6.23.4 A Waste management Strategy has been submitted with the application, prepared by TPP.

6.23.5 The required waste storage provision has been established based on waste generation rates set out within Lambeth’s Waste Guidance document. For the private tower, a local waste room is provided for the residents to deposit their waste. The waste store will have sufficient capacity for one day’s worth of waste. A managed strategy will be adopted whereby on-site management will transfer full containers at the end of each day to the main refuse collection store. Additionally, general waste will be compacted in 1,100 litre Eurobins by on-site management before collection. No compaction is proposed for recyclable waste which will be stored and collected in 1,280l Eurobins.

6.23.6 For the affordable apartments, one refuse store will be provided for residents to deposit their waste and for collection by LBL waste operatives. The store will have capacity for a week’s worth of storage with no management or compaction required.

6.23.7 Additionally, a dedicated bulky storage area is provided within each of the refuse stores for residents to place their redundant bulky goods. This service is provided by the Council at a charge.

6.23.8 Refuse collection will take place wholly within the proposed development site. A refuse vehicle will be able to stop within 10m of the collection stores and enter and exit the development in forward gear. General and recyclable waste will be collected on a weekly basis.

## **Energy and Sustainability**

6.24.1 A full Energy Assessment, carried out by Griffiths Evans has been submitted with the application. The principles of the energy strategy have been developed in consultation with LBL and the GLA and adopt the Local Plan and London Plan policy hierarchy: be lean, be clean, be green. The overriding objective in the formulation of the strategy has been to maximise the reductions in CO2 emissions through the application of this hierarchy with a cost-effective, viable and technically appropriate approach.

6.24.2 In line with the latest guidance from the GLA the design will maximise improvements on the Building Regulations through the application of energy reduction (Be Lean) measures. In order to reduce the energy demand for the building, the design team will consider the following.

### *High Performance Building Fabric*

6.24.3 The development will as a minimum meet the building envelope thermal performance requirements as set out by the UK Building regulations 2013 and will explore ways in which these can be improved. The improved thermal performance of the building will be the primary driver in reducing heat loss from the building.

6.25.4 As well as exceeding the Building Regulations minimum requirements for thermal insulation (U-Values and thermal bridge Y-Values) we are also exploring the limits of air tightness that may be realistically achieved during construction.

### *Building Thermal Mass*

6.24.5 The SAP calculation are being developed on the basis that the building having a concrete frame with stud party walls and an insulated aluminium cladding for the external walls.

### *Passive Solar Heating and Overheating Control*

6.24.6 The building fabric design is being optimised by striking a balance between harnessing solar gains to reduce winter time heating loads whilst also providing adequate shading during the summer to mitigate the risk of overheating.

### *Lighting*

6.24.7 Lighting plays an important role in the level of carbon emissions from a building, and therefore the design team will look at lighting designs that use energy more efficiently. This will include the use of LED technology wherever feasible.

### *Mechanical Systems*

6.24.8 High quality and energy efficient mechanical plant will be an influential factor in the reduction of primary energy consumption and carbon emissions. Further, the mechanical systems will be designed to consume as little energy as possible, this will be achieved by:

- Accurate sizing of plant to avoid over-sized plant operating inefficiently at part loads.
- Zoning of heating and ventilation systems.
- Air to air heat recovery in ventilation systems where practical.
- Enhanced thermal Insulation heating systems.
- Minimising ventilation and hydraulic system conduit run lengths.
- Selecting fans to achieve the best Specific Fan Power achievable for a given system.
- Using a viable volume flow control strategy for heating systems using inverter speed controllers for the pumps.

### *Domestic Hot Water System*

6.24.9 Hot water shall be generated using instantaneous plate heat exchangers which produce hot water at the point of use rather than storage systems which are susceptible to heat losses from the storage vessels. The primary heating source shall be the same high efficiency plant used for the central, space heating system.

### *Automatic Controls and Energy Management Systems*

6.24.10 The centralised heating and hot water plant will utilise automatic controls which schedule the operation of the plant as well optimise control for maximum energy efficiency, with the following control strategies proposed:

- Outside air temperature compensating control of the central heating system flow temperature to minimise heat losses during the summer low demand period. This strategy also assists with controlling heat gains to the corridors to help mitigate overheating risks.
- Variable speed control of circulating pumps to minimise energy by matching system demand patterns and turning down pump speeds during periods of load heating demand.

6.24.11 Electrical and gas energy use for all the central plant and buildings landlord/common areas shall be sub-metered in accordance with the requirements of The Building Regulation. Automatic Meter Reading systems will be applied where practical to allow ease of monitoring and to flag unusual consumption patterns.

6.24.12 At an apartment level, smart meters shall be provided to display real time and historic electricity usage to the occupant. Smart heating controls which allow the occupant to schedule different temperature set points for each heating zone via or wall controller or remotely from the apartment using a smart phone.

6.24.13 Throughout the design development the cooling hierarchy defined in Policy 5.9 of The London Plan is being followed to control summertime overheating within the apartments and corridors.

6.24.14 This process of optimising the design is being carried out through the application of dynamic thermal modelling with the results being measured against the CIBSE metric - TM59 Design methodology for the assessment of overheating risk in homes. The as designed performance of the apartments shall also be reported against Criterion 3 of Part L1A of the Building Regulations.

## **Lighting**

6.25.1 The policy desire to provide better lighting for the pedestrian environment runs through Lambeth Local Plan, as part of a general approach to security and better design, and further runs through the GLA healthy streets approach:

*“Positive design solutions such as good natural surveillance, well placed entrances, clear circulation routes, good lighting and secure boundaries are encouraged”*

6.25.2 An Artificial Lighting Strategy has been prepared by Lumineer Studio to support the planning application, which provides a detailed lighting study to illustrate the external lighting intended for the scheme to be compliant with the relevant British Standards and CIBSE recommendations for illuminating exterior spaces. The study takes into consideration the ‘Safe by Design’ document, assuring good visibility is maintained throughout the site and any changes of levels are identified, and the local surroundings to ensure a lighting scheme which does not exceed the permissible light pollution and addresses areas of sensitivity.

6.25.3 A masterplanned approach has been taken starting from a movement and entrances appraisal, to evaluate how the space is used and to then define a programme of illumination. This strategy is then built up from a movement diagram, defining the pedestrian routes through the site and showing them to be divided into two categories, the main route that crosses the site from Northeast to South and other secondary routes that are mainly used by residents. This is then built into the lighting strategy, where lighting elements are utilised to create different character spaces.

6.25.5 The proposed lighting strategy, will create a safe and secure environment and assist the visitor through the site, connecting the entrances by highlighting the main route and proposing low level luminaires at areas which are intended for mainly residents’ use. The lighting at the main pedestrian area will promote safe and managed after dark use of the space for social gatherings and create a sense of a community.

## **Flood Risk**

6.26.1 The application site is located entirely within Flood Zone 3 (High probability). However, the extent of Flood Zone 3 does not take account of existing flood defences. The application site benefits from flood defences which protect against direct tidal flooding from the River Thames during events with up to a 1 in 1,000 (0.1%) annual probability. Therefore, after consideration of existing defence assets, the actual tidal and fluvial flood risk at the application site is currently equivalent to that typically associated with Flood Zone 1.

6.26.2 The closest watercourse is the River Thames, approximately 1.1km to the west of the site. The Thames Water sewer records indicate a foul sewer running from east to west along

the southern boundary of the site in Dugard Way. This connects into a combined sewer around the access of the site and continues into Renfrew Road. A second Thames Water combined sewer runs across Dante Road near the north-east of the site.

6.26.3 A full Flood Risk Assessment has been submitted with the application, which has been conducted in accordance with the requirements of the NPPF.

- The online EA flood map shows the development site is in Flood Zone 3 and benefits from flood defences. In line with the NPPF, the site can be categorised as “More Vulnerable”.
- The site benefits from flood defences, which are currently at 5.41m and to allow for future defence raising to a level of 6.35m for years 2065 and 2100.
- The surface water drainage network will be designed to accommodate all storm events up to the 1 in 100-year storm event (plus 40% climate change).
- The private drainage network will have non-return valves on any outfall to the public sewer to prevent backflows.
- The SFRA locates the site in an area with increased potential for elevated groundwater. Groundwater monitoring will be required to investigate the risk of flooding from groundwater.
- It is noted that a basement is proposed on this development. Flood resilience measures will need to be implemented to prevent flood waters entering the basement.
- Flood mitigation measures will need to be in place to ensure that flood waters will not enter the property in the design flood event.
- The risk of flooding from surface water is generally considered low for this site, with the north-western area of the site considered high risk. The proposed development will include SuDS features to reduce the impermeable area and manage levels to direct flows away from buildings.
- The risk of flooding from reservoirs is low.

6.26.4 Based on the information provided by the EA and SFRA, the site has a low, or suitably managed, probability of suffering from any form of flooding.

## **SUDS**

6.27.1 A Drainage Strategy has been submitted with the application. Policy EN6 of Lambeth Local Plan states that development proposals should implement sustainable water management and demonstrate that there will be a net decrease in both the volume and rate of run-off leaving the site by incorporating sustainable drainage systems (SuDS) in line with the London Plan drainage hierarchy and National SuDS Standards to maximise amenity and biodiversity benefits and improve the quality of water discharges.

6.27.2 The conclusions to be drawn from this report are as follows:

- For the flood risk aspects of this site, see the FRA ref 068556-CUR-00-00-RP-C-00002

- The existing drainage to The Cinema Museum is to be retained. Other existing onsite drainage is to be abandoned. Further investigations are required to establish the extent of the existing network and connections.
- Two potential outfalls to Thames Water Sewers have been identified; one in Dugard Way and one in Dante Road. Asset records shows levels for Dante Road, but not Dugard Way. Hence, a CCTV survey will be required to confirm invert levels.
- It is proposed to outfall via gravity to Dante Road. Separate surface and foul water networks will be retained on site, which will combine in a final manhole and one outfall to the public sewer.
- 258 residential units are proposed; at this stage, assumptions of an average of 2 bathrooms per unit have been made, with a split of 1 bath/1 shower – TBC as the design progresses.
- A Thames Water pre-development enquiry has been submitted to determine if the sewer has capacity. Thames Water responded that there was sufficient capacity for foul and that surface water was to be restricted to 3.5l/s. Due to an increase in residential units Thames Water have been contacted again for confirmation and a response has not yet been received.
- Groundwater monitoring will need to be carried out.
- It has been assumed that the external areas are hard-paved for calculations and no permeable paving is to be considered.
- The proposed drainage network has been sized considering the 1 in 100 years storm event with a 40% allowance for climate change.
- The proposed surface water network will be restricted to 3.5l/s. To achieve this discharge rate an attenuation volume of between 394m<sup>3</sup> will be provided. This volume will be achieved through the use of sub base storage and attenuation tank.
- If the proposed network cannot discharge to the public sewer via gravity, a 24 hour emergency storage volume will be required as specified in building regulations.
- Pump station and its associated 24 hour emergency volume will be required for the foul flows from the basement as per building regulations.

## Archaeology

6.29.1 The site is not within an archaeological priority area as defined with Lambeth Local Plan, and the site has been in use and widely developed as part of the hospital complex since at least the 1800s. An archaeological Desk-Based Assessment has been prepared by WYG in support of a planning application for the proposed redevelopment of the former Woodlands and Masters House site in Lambeth, London. Research was carried out using data received from the Greater London Historic Environment Record, archival materials and a site survey. It has concluded that the development site is situated within an area of archaeological potential, in particular for the Roman, Medieval and Industrial periods, although it is acknowledged that previous development within the site boundary is likely to have truncated any in situ archaeological remains from earlier periods. As such, it is concluded that a programme of archaeological monitoring following demolition and during groundworks would be appropriate to facilitate development. This can be secured via an appropriately worded condition.

## Contamination

6.30.1 A Preliminary Site Assessment (PSA) has been carried out by Curtins. According to Borehole data, Artificial deposits (Made Ground) are present across the site area, in line with historical developments. Existing ground investigations are available to cross reference.

6.30.2 Superficial deposits are recorded on-site. The Kempton Park Gravel strata comprises sand, gravel local lenses of silt, clay or peat. The bedrock geology comprises the London Clay Formation that is typically characterised by poorly laminated, blue-grey or grey-brown, slightly calcareous, silty to very silty clay, with some layers of sandy clay.

6.30.3 With reference to the history of the site and immediate surrounding area, the qualitative risk assessment (QRA) determined an overall Moderate to Low level of risk associated with the proposed development. The risk presented to the development from ground gases is assessed as Moderate to Low at this stage and primarily controlled by potential gases from any Made ground deposit across the site.

## Biodiversity

6.31.1 The revised NPPF was issued on 24th July 2018 and currently supplements government Circular 06/2005, *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*.

6.31.2 Circular 06/2005 states that the presence of protected species is a material consideration in the planning process. Paragraph 170 of the NPPF also states that '*Planning policies and decisions should contribute to and enhance the natural environment by:*

- *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)*
- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland*
- *maintaining the character of the undeveloped coast, while improving public access to it where appropriate*
- *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*
- *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

6.31.3 When determining planning applications, local planning authorities should apply the following principles:

- *if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity*

6.31.4 A full ecological and biodiversity assessment has been submitted with the application (carried out by WYG). This concludes that there is very limited biodiversity on the site, however care should be taken to ensure protection of bats and nesting birds. It is recommended that the proposed planting should incorporate native species berry producing species which will provide nesting and foraging capacity for common bird species and local BAP species.

## **Arboricultural Assessment**

6.32.1 A full Arboricultural Survey and Report has been carried out.

6.32.2 There is no removal of Category A trees although fifteen category B trees, thirty category C trees, one category U tree and two category C groups will be removed to facilitate the proposed development.

6.32.3 Given the site the number of tree removals is the inevitable result of the unmanaged proliferation of trees particularly to the rear of the health care unit combined with problematic existing ground levels. Despite the number of trees being removed, the majority of these are of a young to early mature age class and solid mitigation with a soft landscaping scheme has been provided that includes tree planting in sustainable locations, to make a long term contribution to the local treescape.

6.32.3 The proposed development also involves construction of a new boundary brick wall within the root protection areas of five retained trees on the northern boundary. This will be constructed sensitively as described in the report with an Arboricultural method statement to enable the trees to be retained. Existing hard standing will also be replaced within the root protection area of one tree to the south of the cinema museum. This will occur sensitively within the root protection area.

6.32.4 Based on the above assessment, trees recommended for retention in this report can be protected during the construction period and successfully integrated into the site post development.

## **Air Quality**

6.33.1 A full AQA has been submitted with the application. The entire of Lambeth is within an Air Quality Management Area in relation to a breach of nitrogen dioxide (annual mean and hourly mean) and particulate matters (daily mean and annual mean) objectives as specified in the Air Quality Regulations 2000. Although transport is not the only sector responsible for contributing to poor air quality, Lambeth's Air Quality Report 2009 indicated that levels of nitrogen dioxide and fine particles are likely to continue to fail government targets, and these are best tackled by reducing the use of motorised transport and using cleaner and more efficient fuels for transport.

6.33.2 During the demolition and construction works, there is the potential that emissions of dust arising from the application site could result in a loss of amenity at nearby existing residential properties. However with the implementation of suitable mitigation measures, which would be set out within a Construction Management Plan (CMP) and Construction Method Statements to be agreed with LBL, it is anticipated that dust effects could be mitigated to at worst to be temporary, direct slight adverse at existing and future on-site receptors.

6.33.3 The assessment of the effect of emissions from traffic associated with the scheme, has determined that the maximum predicted increase in the annual average NO<sub>2</sub> concentration at any modelled existing receptor is 0.01 µg/m<sup>3</sup> at 9 Dante Road (R1) and 40 Renfrew Road (R8). All modelled proposed receptors are predicted to be below the annual mean AQO for NO<sub>2</sub>, and therefore no additional mitigation measures will be required. All proposed receptors predict NO<sub>2</sub> concentrations of below 60 µg/m<sup>3</sup> in all scenarios. Therefore, it is unlikely for any exceedances of the short-term NO<sub>2</sub> AQO to occur as outlined in LAQM TG16 technical guidance.

6.33.4 The maximum predicted increase in the annual average PM<sub>10</sub> and PM<sub>2.5</sub> concentrations at all modelled existing receptors is predicted to be <0.01 µg/m<sup>3</sup>.

6.33.5 The assessment of the impact description of the effects of the proposed development with respect to NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> exposure is determined to be 'negligible' for all receptors.

### *Cumulative Impact Assessment from Traffic Emissions and Energy Centre Emissions*

6.33.6 Cumulative impact assessment considered the impacts of emissions from the three Hoval boilers associated with the scheme and the emissions from traffic. The assessment has determined that the maximum predicted increase in the annual average NO<sub>2</sub> concentration from the boiler emissions at any modelled existing receptor is 0.43 µg/m<sup>3</sup> at 9 Dante Road (R1).

6.33.7 The long-term predicted environmental concentrations of NO<sub>2</sub> at some of the existing receptor locations are above the relevant AQO due to the high background concentration levels. However, the increase of the predicted contributions of long-term NO<sub>2</sub> are all less than 1% of the AQO and the impact are determined to be 'negligible' at all existing sensitive receptors.

6.33.8 All modelled proposed receptors are predicted to be below the annual mean AQO for NO<sub>2</sub>, and therefore no additional mitigation measures will be required. The assessment of the effect of emissions from the three Hoval boilers associated with the scheme, have determined that the maximum predicted increase in the short-term NO<sub>2</sub> concentration at any modelled existing receptor is 5.19 µg/m<sup>3</sup> at 9 Dante Road (R1). All modelled existing and proposed receptors are predicted to be below the Short Term NO<sub>2</sub> AQO of 200 µg/m<sup>3</sup>.

### *Air Quality Neutral Assessment*

6.33.9 The Air Quality Neutral calculations have determined that the proposed development will meet both the Building Emissions Benchmark and Transport Emissions Benchmark. Therefore, the proposed development can be determined to be Air Quality Neutral in terms of both Building and Transport Emissions and further offsetting will not be required.

6.33.10 The proposed development will meet the London policy requirements to be at least air quality neutral for both Building and Transport Emissions.

### **Noise and Vibration**

6.33.1 A full acoustic assessment has been carried out by Sharp Redmore.

6.33.2 The objective of the assessment has been to consider the development site in relation to the existing sound and vibration environment in accordance with relevant national and local planning policy guidance. The NPPF (2019) includes:

*preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;*

Sound sources primarily being road traffic on the surrounding road network, and potential sound (re-radiated) and vibration from the Northern Line of the London Underground system passing beneath the development site.

6.33.4 Surveys have established the background sound and vibration climate at the development site. The survey results have then been assessed with respect to the relevant local and national planning policies and relevant British and International standards. A 3-dimensional sound model has also been developed to show predicted façade sound levels across the proposed residential buildings scheme developed to date.

6.33.5 It is considered that the site can be developed for residential end use with an appropriate building envelope sound insulation performance and ventilation strategy to meet relevant internal habitable room, and external amenity space sound level criteria.

## **Wind Assessment**

6.34.1 Policy Q2 of Lambeth Local Plan requires that wind effects be modelled to ensure that appropriate residential amenity standards are addressed. The construction of new buildings and, in particular tall buildings, has the potential to cause adverse wind conditions including turbulence and funnelling effects. This is due to the fact that buildings can deflect high-speed winds from high-levels down to pedestrian levels. This movement of air can lead to potentially adverse effects on pedestrian comfort and safety.

6.34.2 A full wind assessment has been submitted with the application. The results of the assessment demonstrate that during conditions representing the highest monitored approaching wind speed conditions, inclusive of the mitigation measures in the latest design layout, maximum wind speeds are expected to be below the lower safety criteria threshold at the majority of locations assessed around the development site. Whilst there is predicted to be a slight exceedance of the lower safety criteria threshold in the area to the west of Block B, the highest predicted resulting wind speeds are below the higher safety criteria threshold and are expected to occur infrequently, therefore being considered acceptable in this context.

## **Construction Management**

6.35.1 A framework Construction Environmental Management Plan has been submitted with the application. This includes details of monitoring and mitigation measures to control the potential environmental impacts during the construction phase. It also includes procedures for handling and investigating complaints.

## **Sustainability**

6.36.1 A Sustainability Assessment has been submitted with the application, prepared by Greengage. This sustainability statement shows that the proposals for the redevelopment at Kennington Stage are meeting key policy objectives, responding to local needs and requirements, and conforming to best practice sustainability criteria applicable to this development.

6.36.2 In all sustainability aspects, the proposed development satisfies policy objectives by optimising sustainability through the incorporation of best practice design, construction and operational measures. Some of the key features highlighted in this sustainability statement include:

- Commitment to building design in accordance with the principles of the energy hierarchy and best practice in sustainable design;
- Incorporation of sustainable transport measures, such as cycle storage facilities and consideration of travel planning for the proposed development to further enhance the accessibility of an existing well-connected site for sustainable transport options;

- The application of materials efficiency, waste hierarchy, life cycle environmental impact and responsible sourcing principles in the design, specification and construction process for the proposed development;
- Incorporation of water efficiency measures in design and an extensive sustainable drainage strategy;
- Commitment to ensuring all forms of pollution are minimised in design and construction;
- Commitment to positively enhancing the site biodiversity and consideration of incorporating ecological enhancement measures, such as green and native species planting;
- Commitment to designing for occupant wellbeing, including consideration of potential for overheating and adaptability for future projected climate change scenarios; and
- Commitment to creating a sustainable community, with local services, walkability and landscaped public realm areas

## Planning Obligations

7.1.1 The Town and Country Planning Act 1990 (as amended) provides measures within section 106 that allow developers to enter into a planning obligation to provide services and facilities connected with the proposed development. Para 56 of the NPPF states that:

Planning obligations should only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.
- Similar provisions are also referred to in the Community Infrastructure Levy 2010 (as amended) (Regulation 122)

7.1.2 The applicant is willing to enter into a section 106 legal agreement with the LBL to offer suitable mitigation measures where the relevant policy tests have been met . The Applicants will seek to agree the wording of the agreement during the course of the application; it is anticipated that the following are likely to come forward as S.106 heads of terms and these will be discussed in further detail as part of the submission process:

- On site affordable housing
- Carbon Offset Contribution
- Employment and Skills
- Local Procurement
- Permit free parking
- Car Club Membership
- Travel Plan
- Servicing/deliveries
- Legal and Monitoring Costs

## Parties

- Anthology Kennington Stage Limited (Company registration No: 11165855) as owner of the application site (title number TGL85338).
- GLA Land and Property Limited (Company registration No: 7911046) as chargee (charge dated 5 December 2018).

## CIL

7.2.1 A CIL form has been submitted with the application. The Lambeth Regulation 123 list comprises:

- Education Facilities: The provision, improvement, replacement, operation or maintenance of new and existing public education facilities (excluding, identified primary school site provision to be secured through planning obligations \*)
- Community facilities: The provision, improvement, replacement, operation or maintenance of new and existing community facilities including Health Care Facilities Library Facilities
- Indoor Sport & Leisure Facilities (defined as publically owned or controlled leisure centres, sports halls and game courts, swimming pools)
- Cultural Facilities (defined as publically owned or controlled theatres, cultural /arts centres, including the Southbank Centre)
- Recycling facilities
- Community or Youth facilities.
- Public Realm Improvements: The provision, improvement, replacement, operation or maintenance of specific public realm projects in Town Centre or area based public realm streetscape schemes/programmes, and improvements and maintenance of existing parks and public open space.
- Transport: The provision, improvement, replacement, operation or maintenance of strategic public transport initiatives (excluding site specific transport interchange schemes), programmed highway and traffic management improvements (Lambeth and TFL), sustainable transport initiatives including cycling and pedestrian routes)

## Conclusion

8.1. The NPPF sets out that the clear purpose of planning is to help achieve sustainable development and support growth, and that development that is sustainable should go ahead without delay, and in order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny but making things happen.

8.2 The application site is currently underused, semi vacant, brownfield, and in a highly accessible location (PTAL 6A/B) adjacent to the Elephant and Castle Opportunity Area and the CAZ boundary. The Development Plan as expressed in the London Plan, Draft London Plan and Lambeth Local Plan is clear that such sites in such locations are appropriate in principle for the location of tall buildings. The proposed development meets all the relevant tests for

the principle of the location of a tall building and is exactly the kind of site that national, regional and local policy wishes to see brought forward.

8.3 The site is adjacent to a conservation area and has been commented on by both the GLA and Historic England (as part of the GLA pre app process). There has been agreement through this pre application process that the direction of the design is appropriate, with a central 'point block' and lower perimeter blocks. The question that has come through the pre application process has been *what* tower and at *what* height? In this context, the planning assessment falls into four key areas:

- 1) Does the tower element meet the relevant tests with regard to the setting of heritage assets?
- 2) Does the development meet the relevant tests with regard to the effect on adjacent residential amenity?
- 3) Does the development meet the relevant policy requirements with regard to play space, servicing, transport (i.e. is the development able to self-serve, without being reliant on other infrastructure)?
- 4) Does the development meet its social and, economic and environmental responsibilities?

8.4 Does the tower element meet the relevant tests with regard to the setting of heritage assets? The approach to the heritage assets has been assessed and it has been agreed that the development would lead to 'less than substantial harm' with, in reality, 'harm' being restricted to limited views from limited locations, and at the lower end of the assessment. In the context of planning policy and national guidance, 'less than substantial harm' is specifically addressed as an 'in balance' issue, weighing the public benefits of the proposal, against any perceived harm to a heritage asset; to balance the 'harm' against the '*public benefit and the securing of the optimal viable use*'. The submission takes a rigorous approach to assessing harm in accordance with the relevant guidance, and only having done this, assesses the public benefits. The harm then, is limited and specific, while the public benefits, in providing a high quality design, reconfiguring the substandard setting of the Cinema Museum, creating a more permeable neighbourhood, increasing accessibility, providing 50% affordable housing, substantial urban design benefits, and bringing back into use a brownfield site, is substantial and quantifiable. The proposed development clearly meets the requirements of the test. London necessarily involves the successful co-existence of heritage assets with major re-development. Elephant and Castle/ Kennington is clearly an area of the city with strong heritage interest; however, the area is undergoing transformational change, in line with the London Plan/ Draft London Plan aspirations, and the need for accessible centre sites to contribute to London's urgent housing requirements. There will inevitably be a tension between the imperative for higher densities and the need to conserve heritage value. However, the proposed development is of high quality design and will enhance the conservation area through quality detailing, enhanced landscaping and improved access.

8.5 Does the development meet the relevant tests with regard to the effect on adjacent residential amenity? The application has been accompanied by a full suite of assessment documents, including daylight and sunlight, landscaping, design and access, transport, waste and servicing, and the development is capable of being accommodated on the site, without causing any undue detriment to surrounding residential amenity – separation distances are generous, there are no detrimental wind effects, and daylight and sunlight effects are acceptable within the context of inner London and not focussed in the height of the building.

8.6 In this context, the proposed height of the central point block has been tested against all relevant planning policy requirements. It is recognised that Daylight and Sunlight are legitimate planning concerns and these have been fully addressed. Any significant effect on the light levels falls within the lower floors of the proposed development, and thereby any development that meets any reasonable aspiration on the site will have a comparable effect.

8.7 Does the development meet the relevant policy requirements with regard to play space, servicing, transport (i.e. is the development able to self-service, without being reliant on other infrastructure)? The development is completely able to self-service, meeting all the housing, open space and play space standards and creating an entirely compliant scheme. Further, this has been fully architected and the approach endorsed by the GLA.

8.8 Does the development meet its social, economic and environmental responsibilities? The application provides 50% affordable housing and is substantiated with a rigorous viability assessment, which the LPA is able to interrogate. The development meets in full the energy requirements of the Draft London Plan, and takes an existing brownfield site of no ecological or biodiversity merit, and landscapes in a manner that contributes to both. As existing the site is inaccessible and intimidating; the development opens this up, in accordance, with CABE, Mayoral and Secure by Design principles.

8.9 The concrete, assessable, elements of the proposed development, then, all meet the relevant planning policy requirements, and the quantum of development can be shown to be appropriate for a development of this kind in this location. Any doubts around the appropriateness of the development lie in a more subjective, un-assessable non-planning realm, and should form no part of the assessment. Planning Policy is adopted and exists in order to guide and assess development and provide rigour and certainty as to how this is carried out; where a development meets the relevant guidance and policies, it is clear that it should go ahead without delay.

8.11 This proposal is in accordance with national and local policies and as such, in terms of the overall planning balance, there are clear and compelling reasons to justify the granting of planning permission and there are no overriding material considerations that weigh against the granting of planning permission. Accordingly, we conclude that there are sound planning grounds to grant planning permission.

Appendix 1 GLA Pre App

Appendix 2 SLaM Marketing Submission.

## Appendix 1

GREATER **LONDON** AUTHORITY

Development, Enterprise and Environment

**Donald Considine**  
**Tp bennett LLP**  
One America Street  
London  
SE1 ONE

**Our ref: GLA/4963/HS01**  
**Date: 21 May 2019**

Dear Mr Considine,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008**

**Woodland and Masters Site**  
**London Borough of Lambeth**  
**Our reference: GLA/4963**

Further to the pre-planning application meeting held on 24 April 2019, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely,



**John Finlayson**  
**Head of Development Management**

cc Lucinda Turner, Tfl



## Woodlands and Masters Site

in the London Borough of Lambeth

### The proposal

Redevelopment of the site to deliver a residential-led scheme with the retention of the Cinema Museum.

### The applicant

The applicant is **Anthology**, the architect is **Rolfe Judd** and the agent is **tp bennett**

### Context

- 1 On 24 April 2019 a follow up pre-planning application meeting was held at City Hall.
- 2 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application
- 3 This advice should be read in conjunction with that previously issued on 6 February 2019.

### Summary of meeting discussion

4 Following a presentation of the updates to the proposed scheme by the applicant team, meeting discussions covered strategic issues with respect to the principle of development, urban design and energy. GLA officer advice in respect of these matters is set out within the sections that follow.

### Principle of development

#### Cinema Museum

- 5 An update was sought by GLA officers on the engagement to date of the applicant with the Cinema Museum.
- 6 The applicant underlined their commitment to supporting the future of the Cinema Museum at the meeting. This is welcomed and GLA officers would want to be satisfied that the final arrangement in terms of the lease arrangement and running of the Cinema Museum are robustly secured as part of any future planning application to secure the future of the Cinema Museum.
- 7 A meeting between GLA cultural and housing officers, the applicant and the Cinema Museum will be arranged to take this forward and agree on acceptable terms for all parties.

## Urban Design

### Proposed tower

8 The applicant presented illustrations of the full appearance of the tower for the first time. A building up to 29 storeys with two distinct elements is proposed. The two elements of the tower are distinguishable but relate to one another which is welcomed in terms of the architectural composition. However, given the sensitive site context, which contains nearby heritage assets, an immediate context of lower prevailing building height and a tight relationship with neighbouring buildings, further modulation of the building elements and elevational treatments to reduce the apparent bulk of the building should be explored in order to reduce the impact of the overall height on views and heritage assets. The impact of the development on Lambeth Council's selected local views should be tested by the applicant in any future application. The Sepia tone of the detailed design is preferred to the initial black tone as it appears less dominant in the architectural surroundings.

9 The full length of the tower appears closer to houses on Castlebrook Close (to the north). The dramatic step up in scale between these two storey buildings and the tower must be carefully managed through ensuring sensitive proximities and elevational treatments. The aerial view from the south provided at the meeting is useful. A view from the north should also be provided to help clarify how the building height and mass relates to its immediate context and at lower levels.

### Site layout

10 The north east to south west pedestrian connection works well across the site, tying into surrounding sites, and providing more space and presence to the area under and around the tower.

11 The north east site entrance has been improved with increased footway and reconfigured cycle storage to the north corner (previously this lined the northern boundary of the site, further restricting the residential garden space around the tower). The north and west resident yards/access route to dwellings now reads as a more private space, away from the main diagonal route.

12 Play areas appear generally acceptable apart from the under 5 doorstep play within the simple pedestrian square. This area does not appear well placed or defended with the uses that surround it, including car parking, cycle, waste and refuse points, and vehicular access.

### Block A

13 The above described layout and uses that are incorporated into block A group together to form an inactive frontage to the public realm. Careful detailing of materiality can help this, but it should first be considered if the massing and building lines can be neater. The residential entrance is prominent, which is encouraged, but it does not have an active relationship with the south elevation and the under-5 play space/public square.

14 The extension of single storey rear mass to block A creates restricted space for the proposed trees and vegetation to form a buffer to Renfrew Road and garden space is also lost by this arrangement. Access and maintenance may also be more difficult with the trees planted, as such a boundary is needed to soften the introduction of the building here. The applicant should explore moving the building line back in this location to address these issues.

15 To improve the relationship of block A to Renfrew Road the building is proposed at 3 storeys to the rear, stepping up away from Renfrew Road. The building line would be 20 metres from the original line of houses (not including extensions). This distance can be acceptable where other elements are developed, e.g. the hit and miss brick work and inset layout for balconies would help to improve privacy conditions on the boundary with these neighbours.

16 Advice provided on heritage in the pre-application report of 6 February 2019 still stands.

## **Energy**

17 The updated GLA Energy Assessment Guidance provides details on the information that should be provided within the energy assessment to be submitted at stage 1. See link for the latest guidance published in October 2018: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

18 The following targets are in effect for all Stage 1 schemes received by the Mayor as set out in the guidance:

- Residential – Net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations.

19 The applicant proposes to achieve at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations; this is welcomed.

20 The carbon emission figures should be reported against a Part L 2013 baseline. Carbon emissions for domestic and non-domestic elements of the development should be presented separately.

21 From January 2019, and until central Government updates Part L with the latest carbon emission factors, applicants are encouraged to use the SAP 10 emission factors for referable applications when estimating CO2 emission performance against London Plan policies. The applicant has provided an assessment of CO2 emissions using both SAP 10 and SAP 2012 emissions factors; this is welcomed. A spreadsheet has been provided for this purpose and the applicant should submit this alongside their application. Applicants will still need to provide an assessment of CO2 performance using SAP 2012 emission factors to enable a comparison to be made. Applicants proposing to only use SAP 2012 emission factors will need to provide a justification for this.

### **Be Lean Demand Reduction**

22 The applicant should commit to meeting Part L 2013 by efficiency measures alone as a minimum. Applicants should note the new draft London Plan Energy Efficiency targets which set out the GLA's expectation for levels of improvement achievable for new developments:

- o Residential – 10% improvement on 2013 Building Regulations from energy efficiency

23 The applicant suggests that they are expecting to achieve an improvement on 2013 Building Regulations from energy efficiency of approximately 6%; they should demonstrate that they have fully exploited the opportunities for energy efficiency measures.

24 The applicant is proposing to exceed the default thermal bridging value assumed in Building Regulations, which is welcomed. They should demonstrate that the proposed thermal bridging assumption is achievable with the proposed concrete frame construction with aluminium cladding.

25 Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

26 Information on the development's total energy demand (MWh/year) for each building use and the total Part L Fabric Energy Efficiency Standard (FEES) should be reported.

## Cooling and Overheating

27 The domestic overheating checklist, included in the Energy Assessment Guidance, should be completed at pre-application stage and used to identify potential overheating risk and passive responses early in the design process.

28 The applicant proposes a significant number of single aspect dwellings due to the site constraints – this number should be minimised, and the applicant should consider that single aspect dwellings may require additional passive measures compared to dual aspect dwellings.

29 Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the Cooling Hierarchy. Dynamic overheating modelling in line with CIBSE Guidance is recommended (TM59 and TM49 for residential and TM52 and TM49 for non-residential). The applicant is undertaking dynamic overheating modelling of apartments in line with TM59, which is welcomed.

30 The area weighted average (MJ/m<sup>2</sup>) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional.

## Be Clean Heating Infrastructure

31 The applicant suggests that the site is remote from any existing heat networks, however this will need to be demonstrated. The applicant should investigate opportunities for connection to nearby existing or planned district heating (DH) networks, including SELCHP, SBEG and VNEB. Evidence of communication with the relevant parties (i.e. stakeholders, local authority energy officers) should be provided, and include confirmation or otherwise from the network operator that the network has the capacity to serve the new development, of the connection distance, and if feasible with supporting estimates of the CO<sub>2</sub> emission factor, installation cost and timescales for connection. Connection to district heating should be prioritised.

32 The site should be served by a single energy centre and the applicant should commit to providing a site wide heating network where all buildings/uses on site will be connected; relevant drawings/schematics for the energy centre and the site-wide network should be provided.

33 The applicant should provide information confirming that the development is future proofed for connection to wider district networks now or in the future.

34 Should CHP be proposed, applicant will be expected to provide sufficient information to justify its use and ensure that the carbon and air quality impact is minimised. See Appendix 3 of the Energy Assessment Guidance (October 2018) for further details. It should be noted that gas-engine CHP is not supported for small/medium developments. The applicant has proposed two options:

- Central gas boilers and CHP – this is not supported
- Central Air Source Heat Pumps (ASHPs) and gas boilers – this is welcomed; see Be Green section for further comments.

## Be Green Renewable Energy

35 The GLA expects all major development proposals to maximise on-site renewable energy generation. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy.

36 The applicant intends to install Solar PV, which is welcomed; this should be maximised. A plan showing the proposed location of the installation should be provided and the applicant should demonstrate that the roof's potential has been maximised for the installation.

37 The applicant is encouraged to pursue the central Air Source Heat Pumps (ASHPs) and gas boilers strategy and they should assess this as part of the Be Green element of the energy hierarchy. Their main concern with this strategy is a perception this might lead to a higher cost of energy for occupants. The available evidence and our wider experience suggests the operational cost difference between CHP and heat pumps will not be significant if the scheme is well designed, built, commissioned and operated. For more information on heat pump strategies and related impacts, the applicant is encouraged to review: [https://www.london.gov.uk/sites/default/files/low\\_carbon\\_heat\\_-\\_heat\\_pumps\\_in\\_london\\_.pdf](https://www.london.gov.uk/sites/default/files/low_carbon_heat_-_heat_pumps_in_london_.pdf)

### Carbon Offsetting

38 Applicants are expected to maximise carbon emission reductions on-site. Where it is clearly demonstrated that no further carbon savings can be achieved but the site still falls short of the carbon reduction targets, applicants are required to make a cash-in-lieu contribution to the relevant boroughs' carbon offset fund using the boroughs' carbon offset price.

39 Energy strategies should provide a calculation of the shortfall in carbon emissions and evidence of discussions with the borough agreeing the offsetting approach.

### Monitoring

40 The energy strategy should include information on how the building's energy performance will be monitored post-construction to enable occupants to monitor and reduce their energy use.

### **Conclusion**

41 The proposal is generally supported, however this is subject to securing the future of the Cinema Museum, exploring further modulation of the tower elements to reduce the apparent bulk of the building, and further detail testing in terms of the impact of the development proposal on heritage assets and the existing and future residents' amenity. The applicant is encouraged to continue to engage with the Council to address these issues.

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for further information, contact the GLA Planning Team:

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GREATER **LONDON** AUTHORITY

Development, Enterprise and Environment

**Donald Considine**  
**Tp bennett LLP**  
One America Street  
London  
SE1 ONE

**Our ref:** GLA/4963/H5  
**Date:** 6 February 2019

Dear Mr Considine,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008**

**Woodland and Masters Site**  
**London Borough of Lambeth**  
**Our reference: GLA/4963**

Further to the pre-planning application meeting held on 9 January 2019, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely,



**John Finlayson**  
Head of Development Management

cc Lucinda Turner, TfL



## Woodlands and Masters Site

in the London Borough of Lambeth

### The proposal

Redevelopment of the site to deliver a residential-led scheme with 292 homes and retain the Cinema Museum.

### The applicant

The applicant is **Anthology**, the architect is **Rolfe Judd** and the agent is **tp bennett**.

### Context

1 On 19 November 2018 a request was received for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 9 January 2019 a pre-planning application meeting was held at City Hall with the following attendees:

GLA - Hermine Sanson, Principal Strategic Planner (Case Officer)  
Lyndon Fothergill, Team Leader  
Sabrina Lee, Urban Design  
Jonathan Schifferes, Housing  
Ed Bayes, Culture  
Andrew Hiley, Transport for London

Applicant - Adam Gaymer, Anthology  
Neil Sams, Anthology  
Andrew Long, Rolfe Judd  
Charles Graham, Rolfe Judd  
Suzanne Coucher, fha  
Donald Considine, tp bennett

2 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

### Site description

3 The 0.7 hectare site is bounded by Renfrew Road to the west and Dugard Way (an internal road which forms part of the site) to the south and west. To the south are residential blocks within the Bellway redevelopment of part of the former hospital site, and houses on Castlebrook Road (with land owned by L&Q) and Dante Road form the northern and eastern boundaries. The site forms the remaining part of the former Lambeth Hospital site and is currently occupied by Woodlands – a former nursing home and Master's House – a two storey Grade II listed building. Masters House is currently occupied by the Cinema Museum on a rolling lease. The site was owned until recently by the NHS.

4 There are two locally listed lodges at the entrance gates into the site from Dugard Way, and the water tower to the former Lambeth Workhouse is also a Grade II listed structure. Part of the site is within the Renfrew Road Conservation Area, and there are further listed structures and buildings close by to the south of the site, including the former fire station and the former Lambeth Magistrates Court.

5 The site is on the eastern boundary of the London Borough of Lambeth and adjoins the London Borough of Southwark, which also marks the boundary with the Elephant and Castle Opportunity Area and the Central Activities Zone (CAZ).

6 The site lies away from the Transport for London Road Network (TLRN), for which TfL is the highway authority. It has a very high public transport accessibility (PTAL 6a/6b, the highest level), and is near Elephant and Castle interchange. The Thameslink upgrade has recently been substantially completed so the station now has a more frequent and higher capacity service with 12 trains per hour to/from central London in the peaks. London Underground (LU) are progressing a project to increase capacity of the Elephant and Castle Northern Line ticket hall (NLTH) and replace the lifts with escalators, to be delivered as part of the shopping centre redevelopment that has recently received planning permission.

## Site history

7 The site has no strategic history.

## Details of the proposal

8 The redevelopment of this site would involve the retention of Masters House to form permanent premises for the Cinema Museum, and the redevelopment of the Woodlands House site to provide buildings between 3 and 35 storeys for residential use. A total of 306 homes is proposed.

## Strategic planning issues and relevant policies and guidance

9 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Lambeth Council's Local Plan (2015), and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

10 The following are relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance.
- Draft New London Plan showing Minor Suggested Changes (13 August 2018)
- In August 2017 the Mayor published his Affordable Housing and Viability SPG.

11 The relevant issues and corresponding policies are as follows:

- Culture *London Plan;*
- Heath facilities *London Plan;*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Affordable housing *London Plan; Housing SPG, Affordable Housing & Viability SPG;*
- Density *London Plan; Housing SPG;*
- Urban design *London Plan;*
- Inclusive access *London Plan; Mayor's Environment Strategy;*
- Air Quality *London Plan; the Mayor's Air Quality Strategy;*

- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy.*

## **Summary of meeting discussion**

12 Meeting discussions covered strategic issues with respect to the principle of development, housing and affordable housing, urban and inclusive design, climate change and transport. Further strategic planning issues are set out below, for reference.

13 GLA officers welcome the opportunity to review the scheme at this early stage and would encourage further discussion as the proposal is developed in more detail.

## **Principle of development**

16 The sites lies on the edge of the Elephant and Castle Opportunity Area, the Central Activities Zone (CAZ) and Elephant and Castle major town centre.

### Health facility

17 London Plan Policies 3.16, 3.17 and London Plan Policy S1 resist the loss of social infrastructure in an area of defined need unless there are realistic proposals for re-provision or the loss is part of a wider public service transformation plan, which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services.

18 It is understood from the meeting that the former Woodlands nursing home ceased to operate in 2013 and is now vacant following its relocation in an improved facility in Denmark Hill. In accordance with draft London Plan Policy S1 (part F and para. 5.1.6), where social infrastructure providers are undertaking an agreed programme of social infrastructure re-provision or service reconfiguration, losses of social infrastructure from redundant sites may be acceptable. As such, the GLA would expect any application to be accompanied by a statement from the NHS setting out why the nursing home is redundant and how the closure of the facility fits into its wider strategy for healthcare provision, and confirm details of the re-provision.

### Cinema museum

19 London Plan Policy 4.6 and draft London Plan Policy HC5 protect existing cultural venues and facilities.

20 The applicant's intention to offer a permanent home to the Cinema Museum within Woodlands House is strongly supported, as this would not only secure an active use for the Grade II listed building but would also ensure that the future of an important local cultural and community asset is secured. Protecting the Cinema Museum is a Mayoral priority, and GLA officers would want to see the museum securing a long lease with affordable rental levels and public accessibility (which would allow the museum to have enough exhibition space to support a long-term sustainable business model). Discussions on the terms of the lease agreement are currently happening between the developer and the Cinema Museum. It would be helpful for GLA officers to understand the details of these terms. The terms of the agreement between the applicant and the museum should be secured through a planning obligation.

### Housing

21 The proposal to deliver 306 residential units will contribute towards the delivery of London's housing requirements and the Council's minimum target in line with London Plan Policy 3.3 and draft

London Plan Policy H1. This is supported. As the site is public land, the GLA will expect the redeveloped site to deliver its full potential in terms of its affordable housing provision, as outlined further below.

## Summary

22 Given the site's location on the edge of an opportunity area and a major town centre and the strategic support for enhanced cultural provision and additional homes, the principle of the redevelopment of this site is strongly supported.

## Housing

23 The outline element of the scheme proposes 306 residential units.

### Affordable housing

24 London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing. The Mayor's Affordable Housing and Viability SPG establishes a minimum pan-London threshold level of 35% affordable housing (without grant) with a strategic target of 50%. The SPG approach is formalised within draft London Plan Policies H5, H6 and H7. Draft London Plan Policies H5 and H6 introduce a specific threshold level for development on public sector land where there is no portfolio agreement with the Mayor, which is set at 50% affordable housing. Lambeth's Local Plan sets a 50% affordable housing target where subsidy is available and 40% without public subsidy with a tenure mix of 70% of new affordable housing units as social and affordable rent and 30% as intermediate provision.

25 The applicant advised at the meeting that the future application would seek to achieve 50% affordable housing by habitable rooms with the help of public subsidies. The proposed tenure split would be 69% shared ownership, 31% London Affordable Rent, which the applicant advised does not comply with Lambeth's preferred tenure split.

26 The applicant is advised that in line with draft London Plan Policy H7 where 50 per cent affordable housing is delivered on public land, the tenure of additional affordable homes above the 35% is flexible. However, at least 35% of housing should follow the Mayor's preferred tenure split of a minimum 30% low cost rent, a minimum 30% intermediate and the remaining 40% determined by the borough in accordance with its own local need.

27 Whilst it is welcomed that the applicant will seek to deliver 50% affordable housing, given that this will not be achieved without the use of grant and will not be a policy compliant tenure, the application will not be eligible for the Fast Track Route and will require independent viability testing and late stage review mechanisms.

28 For schemes that offer less than the 50% threshold without grant, or that propose a non-policy compliant tenure split, a viability appraisal must be submitted to support the proposed scheme. This should be rigorously tested by the Council and its independent consultants, with all key appraisal inputs scrutinised, including: benchmark land value; developer profit margin (relative to scheme risk); build costs; assumptions regarding rental levels, income thresholds and, sales values, other incomes generated by the scheme, in addition to testing grant funding scenarios and alternative tenure mixes. Both the submitted appraisal, and the findings of the independent review, must be shared with the GLA who will work with the Council to robustly scrutinise the viability. In accordance with the Mayor's Affordable Housing and Viability SPG and draft London Plan policy, an early stage and late stage review will be required.

29 The Council will be required to publish the financial viability assessment including any review, in accordance with the Affordable Housing SPG and Policy H6 of the draft London Plan to ensure transparency of information.

#### *Affordability of the products*

30 The Mayor has made clear that he wants all new affordable homes to be genuinely affordable. As part of any future planning application, the applicant should demonstrate that the proposed London Shared Ownership and London Affordable Rent products are genuinely affordable in accordance with the Mayor's qualifying income levels set out in his Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report.

31 London Shared Ownership is defined in the Housing Strategy as based on the national shared ownership model with extra assurances for Londoners over service charges. Homes must be demonstrated as being genuinely affordable to households with incomes under £90,000 (Policy 4.1.C.i). The Mayor has published a Shared Ownership Charter for Service Charges, with signatories setting out their commitment to work together to standardise approaches to service charges. The principles of the charter – transparency, affordability and approach to design – must be applied to all shared ownership homes funded through the Mayor's Homes for Londoners 2016-2021 Affordable Housing Programme.

- [https://www.london.gov.uk/sites/default/files/so\\_charter\\_for\\_service\\_charges\\_-\\_final\\_.pdf](https://www.london.gov.uk/sites/default/files/so_charter_for_service_charges_-_final_.pdf)
- [https://www.london.gov.uk/sites/default/files/2018\\_lhs\\_london\\_housing\\_strategy.pdf](https://www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf)

32 Affordability thresholds for all tenures will need to be secured in the section 106 agreement attached to any permission.

33 The applicant advised at the meeting that discussions had started with Registered Providers (RPs) on the acquisition of the completed homes and affordable housing provision. The applicant also advised that the proposed configuration of the blocks limited the number of affordable rented homes that could be provided and that the affordable rented units could only be accommodated in the stand alone mews block. Whilst the early engagement with the RPs is welcomed, GLA officers do not accept the applicant's justification for the capping of the affordable rented homes provision and would want to know which RPs the applicant has engaged with thus far. GLA officers would be content to broker introductions to RPs that would be willing to manage rented units within a high-rise development containing homes of other tenures.

#### Grant

34 In addition to maximising the delivery of affordable housing, draft London Plan Policy H4 expects all schemes to make the most efficient use of available resources. The applicant advised at the meeting that public subsidies would be sought to increase the affordable housing offer and reach 50%. This is welcomed and the applicant is advised to engage with the GLA housing team as early as possible to explore opportunities for grant funding. Further information on grant funding is provided in the GLA Affordable Homes Programme 2016-2021 Funding Guidance available on the GLA website. Any future S106 agreement should set out the proportion of affordable housing viable with and without grant.

35 It should also be noted that the applicant benefited from a loan on commercial terms which covers land acquisition and development costs for the purpose of accelerating delivery of new homes. This £22m loan facility was agreed by GLA Land and Property Limited through Director's Decision 2305. The first tranche has been drawn down to help with the land acquisition. The second tranche to cover the development costs is contingent on attaining planning permission.

## Housing mix

36 London Plan Policy 3.8 and draft London Plan H12 promote a range of unit sizes in new developments. Policy H4 of Lambeth Local Plan expects affordable housing element of residential developments to reflect the preferred borough-wide housing mix for social/affordable rented and intermediate housing, which is no more than 20% of 1 bedroom units, 20-50% of 2 bedroom units and 40% of 3 bedroom units. For market housing, the policy requires a balanced mix of unit sizes, including family-sized accommodation.

37 The proposal is for a range of 1, 2 and 3 bedroom dwellings. The mix of different unit sizes is supported. The applicant is encouraged to maximise the number of affordable rented family units to satisfy needs in Lambeth and across London in accordance with the policies of the London Plan and draft London Plan.

## Children's play space

38 Children and young people need free, inclusive, accessible and safe spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan encourages development proposals that include housing to make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the draft London Plan states that residential developments should incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child.

39 The applicant has applied the methodology within the Mayor's Play and Informal Recreation SPG and calculated that 510 sq.m. of dedicated play space is required on site. It is proposed that 615 sq.m. of dedicated play space is provided on site with 1,491 sq.m. of multifunctional/incidental play. The applicant also indicated St Mary's Churchyard play area offers off-site provision for 12+ within 400 metres radius of the site.

40 The design and access statement submitted with any application should include a landscaping and play space strategy which demonstrates that the needs of children of all ages are met in terms of quality of provision, size of the play space and distance to the play space in line with the SPG. As set out in the urban design section of this report, it is GLA officers' opinion that some of the proposed play spaces are overshadowed or lack overlooking, and it is suggested that the proposed central play area for the 12+ be extended to the north west (towards the lower residential building) to cater for more age groups.

## Urban design

41 In relation to design, the applicant set out the constraints that affect the site planning, the site's context, and urban design principles it has adopted as part of the initial design work. The design principles in chapter seven of the London Plan and Chapter 3 of the draft London Plan requires all developments to achieve a high standard of design which responds to local character, enhances the public realm and includes architecture of the highest quality that defines the area and makes a positive contribution to the streetscape and cityscape.

42 The London Plan and draft London Plan also both require developments to make the most efficient use of land and to optimise density, using an assessment of site context and a design-led approach to determine site capacity.

43 The density of the scheme is currently unknown. Given the location of the site on the edge of the Elephant and Castle Opportunity Area, the potential improved transport facilities and the optimisation of land use, a high density development could be supported on this site, however, the applicant should demonstrate that it has followed a design-led approach to determine the optimal development density of the site.

44 In line with draft London Plan Policy D2, the applicant should undertake design reviews and GLA officers would welcome the submission of any written advice and any resulting design amendments as part of the planning submission.

#### Site layout

45 Two new routes are proposed to improve the permeability of the site, one to the north east and one to the north west. Whilst this is welcomed, the quality of the access to the north east should be improved with clearer footways that are safe, more legible and large enough for pedestrian movements of c.300 units. As currently presented the main walking route towards the tower entrance appears to run over the carriageway or areas reserved for vehicles. There is also a concern that the required vehicle movements/turning circles may compromise the functionality of the north east entrance as a pedestrian entrance and general ground floor outdoor space. The potential opening up of the north west access (bordering the L&Q land) to the site could be useful and reduce pressure on the north east entrance. The applicant is advised to continue communication with surrounding site owners (e.g. Bellway and L&Q sites) to propose layout and designs that complement each other.

46 The proposal shows a series of shared surfaces, play spaces, multifunctional/incidental spaces, private gardens, public spaces. Whilst the provision of amenity space for residents and open space for visitors is welcomed, there should be a clearer definition between the public and private spaces and the pedestrian routes across the site. The applicant provided clarification on the location of the boundary fences around the water tower public open space, which belongs to the residents of the nearby Bellway development. These boundary fences that cannot be removed will impact on the use and perception of the residential space (including the quality of the under 5 play area south east of the tower). For the proposed amenity space to be more cohesive and beneficial, and the play spaces to be more inviting and safe, it is suggested that the proposed play area at the centre of the site for the 12+ be extended north west (towards the lower residential building) and to other age groups to create a larger play area for all age groups, which will be safer to play in terms of overlooking, segregated from traffic, and where it will be legitimate for children to play.

47 A day light and sunlight study should be completed to ensure the height and massing of the tower does not create excessive overshadowing to the ground floor residential public realm.

#### Height and massing

48 The scheme involves a single tall building of up to 34 storeys with a low rise (4 storey) mews block.

49 The applicant submitted an initial VU city model showing the development in the context of the wider Elephant and Castle Opportunity Area and the town centre development. As the site is on the periphery of the Opportunity Area and Elephant and Castle major town centre, a tall building of exemplary design could relate appropriately to the existing and emerging context of tall buildings around Elephant and Castle. However, the height of the building would need to be fully tested in terms of its localised impact on heritage assets and wider townscape views (this is further detailed in the heritage section of this report), and demonstrate exemplary design in terms of architecture, quality of the amenity space and residential quality (this is further developed in the urban design section of this report) to be acceptable. Subject to this being demonstrated, officers would be supportive of the principle of a tall building on this site.

50 The proposed approach to massing appears logical, striking an appropriate balance between optimising the development density and potential of the site whilst respecting the boundary conditions with neighbouring properties and heritage assets. Detailed designs for the proposals should demonstrate how the tall building will exhibit exemplary architecture, how the proposed buildings will

relate to adjacent sites (for instance the need to preserve amenity to the adjacent residential units on Renfew Road) and how development at ground floor level provides for high quality, activated public realm which acts as an appropriately high quality setting for the listed buildings on the site.

### Residential quality

51 The residential accommodation consists of four storey mews blocks and a tower. Little information on the residential quality has been provided at this stage. From the submitted drawings the proposed mews blocks appear to be flats with approximately four units per core, which is welcomed. In line with London Plan and draft London Plan policies each core should be accessed directly from the public realm and residential units at street level should be provided with individual front doors. *North facing single aspect units in the tower or the mews blocks should be avoided and dual aspect units should be maximised.* The outlook of the residential units facing the rear of the Renfew Road dwellings should be carefully considered, including the incorporation of balconies/private amenity space for the units. It is suggested that the mass at the top of the mews block be stepped back to improve the relation to Renfew Road houses.

### Appearance

52 Although limited information on the architecture and appearance of the buildings was submitted at this stage, the narrative for the design of the tower element, which is based on a film strip concept and relates to the site heritage is positive. The proposed use of bricks for the mews block is welcomed. Officers would welcome further detail on the proposed materials and architecture of the scheme, as the proposals are developed further.

### Heritage

53 As mentioned earlier in this report, the site partially sits in a Conservation Area and contains a number of listed buildings. There are also listed buildings in the vicinity of the site.

54 In line with the NPPF, London Plan Policy and draft London Plan Policy the applicant should undertake an assessment of the heritage significance of the site, including the setting of the existing listed buildings and identifying key views of those buildings originating from within and outside of the site. This will help establish a baseline on which to evaluate the impact of the proposals and any proposed heritage benefits, including any proposed enhancements to the existing buildings, their setting or surroundings.

55 A series of local and strategic views looking at the impact of the proposed tall building on the wider townscape were presented to GLA officers after the pre-application meeting. It is understood that the applicant is still in discussion with the Lambeth Council in relation to the viewing locations in order to ensure that the given views best represent the impacts of the proposals on the historic environment.

56 With regards to the strategic views, the proposed development would fall within a number of LVMF views, including the Panorama from Primrose Hill and some River Prospects views from Waterloo, Hungerford and Westminster Bridge and Victoria Embankment. The applicant presented to officers its proposals in the context of these wider LVMF views. In these views, the proposals are either screened from view or will have a negligible impact, but all views will need to be fully verified.

57 With regards to the more local views and in the views originating from Elephant and Castle and the Walworth Road (O1 and O2), the proposals are seen very much in the context of this highly urban environment and existing/consented tall buildings. As such, the proposals are not considered to cause any harm to heritage assets in those views.

58 In views originating from the Georgian conservation areas to the north and west of the site, the proposed tall building has the potential to create a degree of visual impact, due to the relatively low scale of the buildings, the orientation of the roadways and the composition of the townscape around open public squares, which affords long views of the buildings surrounding the squares. In the meeting, the applicant acknowledged the need to provide a winter view for West Square to further illustrate the impact of the proposals. As currently illustrated in view 03, the proposed tall building (and most of the buildings on the opposite side of the square) are currently screened by vegetation and in the summer months it is therefore likely that the proposals would be largely screened from view.

59 However, Walcot Square is more open in nature and the grade II listed Georgian terraces surrounding the square are largely visible. The top section of the listed water tower adjacent to the application site is also visible in views looking east and is seen against clear sky, enabling its distinctive form to be discerned. The applicant has illustrated two views from Walcot Square – views 04 and 04A. Both of these views show that the proposed tall building would be seen in the context of existing and consented tall buildings in the Elephant and Castle area. However, due to the relatively close proximity of the proposed tall building to the viewer, it would appear as a much larger and taller feature on the skyline and in the view looking east (04) it would fall in the backdrop setting to the water tower, thereby removing the clear sky behind the water tower and making its form more difficult to discern in this view. It is currently GLA officers' view that the proposals could result in a degree of harm to the setting of Walcot Square Conservation Area, the listed buildings in Walcot Square and the listed water tower. This harm could be 'less than substantial' in policy terms. The applicant is strongly encouraged to engage in further discussions with the local authority to look at mitigating this harm (either thorough design or revisions to the scale of the proposed tall building) and providing appropriate public benefits to help balance any resulting harm to the historic environment.

60 View 05 illustrates the impact of the proposals on the gardens outside the Imperial War Museum. The proposed tall building would appear on the skyline in the backdrop context of the gardens and the conservation area buildings to the south of the gardens. This view may cause some harm, however, given the emerging context of tall buildings on the west side of this view, it is GLA officers' view that any harm could be minor. Concerns are however raised on the impact of the proposed tall building on the approach to the Imperial War Museum on Lambeth Road. This view/s should be considered further and the applicant should demonstrate that the proposed tall building will not break the silhouette of the museum frontage in this sequence of views. Such an impact could be considered to cause a degree of harm and would need to be assessed further.

61 Further work is still being undertaken in relation to the impacts on local conservation areas, including Kennington Park Road. It is recommended that this work is progressed and further analysis is undertaken on potential impacts, including views along Hayles Street, which appears to align directly with the site.

62 The proposed arrangement of development on the site could be beneficial to heritage assets by optimising the development quantum (with the associated planning benefits in terms of affordable housing delivery and permanent provision of the community asset) whilst offering breathing space to the retained Masters House which would be surrounded by public space. Any future planning application should demonstrate how the proposals will enhance the conservation area and listed buildings as well as the public benefits of the scheme.

## **Inclusive design**

63 The applicant will need to ensure that the development meets the highest standards of accessibility and inclusion in accordance with London Plan 7.2 and draft London Plan Policy D3, which require design and access statements to explain how the principles of inclusive design, including the

specific needs of disabled people, have been addressed. Further information can be found in the Mayor's Accessible London: Achieving an Inclusive Environment SPG.

## Residential units

64 In line with the national housing standards, London Plan Policy 3.8 and draft London Plan Policy D5 outline that 90% of units should meet Building Regulation requirement M4(2) and the remaining 10% of units meet Building Regulation requirement M4(3). A plan should be submitted with any future planning application to identify the location of the 'wheelchair user' units to ensure that they are distributed across tenures to give disabled and older people similar choices to non-disabled people. GLA officers will advise the Council to secure this provision by way of planning condition as part of any future consultation on a planning application for this scheme.

65 The design of the landscaping and the public realm will be fundamental to how inclusive the development will be for many people and this should be given detailed consideration as the design is developed. The design and access statement should show how disabled people access and move through the zones of public space and each of their entrances safely, including details of levels, gradients, widths, surface materials of the routes/paths and seating proposed. Any shared surfaces, in particular at the north east entrance of the site, should include routes and areas where vehicles would not be able to enter to ensure safety for vulnerable pedestrians such as those who are blind or partially sighted. This should be demonstrated in any future planning application.

## Climate change

### Energy

66 Whilst not discussed in detail at the meeting, the applicant should refer to the updated GLA Energy Assessment Guidance. This provides details on the information that should be provided within the energy assessment to be submitted at stage 1. See link for the latest guidance published in October 2018: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

67 The following targets are in effect for all Stage 1 schemes received by the Mayor as set out in the guidance:

- Residential – Net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations.
- Non-residential – 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The zero carbon target will apply to non-domestic developments when the new London Plan is adopted (expected in late 2019).

68 The carbon emission figures should be reported against a Part L 2013 baseline. Carbon emissions for domestic and non-domestic elements of the development should be presented separately.

69 From January 2019, and until central Government updates Part L with the latest carbon emission factors, applicants are encouraged to use the SAP 10 emission factors for referable applications when estimating CO2 emission performance against London Plan policies. A spreadsheet has been provided for this purpose. Applicants will still need to provide an assessment of CO2 performance using SAP 2012 emission factors to enable a comparison to be made. Applicants proposing to only use SAP 2012 emission factors will need to provide a justification for this.

### *Be Lean Demand Reduction*

70 The applicant should commit to meeting Part L 2013 by efficiency measures alone as a minimum for both domestic and non-domestic elements separately. Applicants should note the new draft London Plan Energy Efficiency targets which set out the GLA's expectation for levels of improvement achievable for new developments:

- Residential – 10% improvement on 2013 Building Regulations from energy efficiency
- Non-residential – 15% improvement on 2013 Building Regulations from energy efficiency

71 Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

72 Information on the development's total energy demand (MWh/year) for each building use and the total Part L Fabric Energy Efficiency Standard (FEES) should be reported.

### *Cooling and Overheating*

73 The domestic overheating checklist, included in the Energy Assessment Guidance, should be completed at pre-application stage and used to identify potential overheating risk and passive responses early in the design process.

74 Any single aspect dwellings are likely to require additional passive measures compared to dual aspect dwellings, and should be minimised

75 Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the Cooling Hierarchy. Dynamic overheating modelling in line with CIBSE Guidance is recommended (TM59 and TM49 for residential and TM52 and TM49 for non-residential).

76 The area weighted average (MJ/m<sup>2</sup>) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional.

### *Be Clean Heating Infrastructure*

77 The applicant should investigate opportunities for connection to nearby existing or planned district heating (DH) networks. Evidence of communication with the relevant parties (i.e. stakeholders, local authority energy officers) should be provided.

78 The site should be served by a single energy centre and the applicant should commit to providing a site wide heating network where all buildings/uses on site will be connected; relevant drawings/schematics for the energy centre and the site-wide network should be provided.

79 The applicant should provide information confirming that the development is future proofed for connection to wider district networks now or in the future.

80 Should CHP be proposed, applicants will be expected to provide sufficient information to justify its use and ensure that the carbon and air quality impact is minimised. See Appendix 3 of the Energy Assessment Guidance (October 2018) for further details. It should be noted that gas-engine CHP is not supported for small/medium developments.

### *Be Green Renewable Energy*

81 The GLA expects all major development proposals to maximise on-site renewable energy generation. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy.

82 Solar PV should be maximised. A plan showing the proposed location of the installation should be provided and the applicant should demonstrate that the roof's potential has been maximised for the installation.

### *Carbon Offsetting*

83 Applicants are expected to maximise carbon emission reductions on-site. Where it is clearly demonstrated that no further carbon savings can be achieved but the site still falls short of the carbon reduction targets, applicants are required to make a cash-in-lieu contribution to the relevant boroughs' carbon offset fund using the boroughs' carbon offset price.

84 Energy strategies should provide a calculation of the shortfall in carbon emissions and evidence of discussions with the borough agreeing the offsetting approach.

### *Monitoring*

85 The energy strategy should include information on how the building's energy performance will be monitored post-construction to enable occupants to monitor and reduce their energy use.

### Flood risk

86 The site is Flood Zone 3 Defended and, under the NPPF, a Flood Risk Assessment (FRA) will need to accompany the application. Environment Agency mapping shows parts of the site to be at high risk of flooding from the surface water. Other forms of flooding may also present a risk. The FRA should assess all sources of flood risk in relation to London Plan Policy 5.12 and draft London Plan Policy SI.12. As the site is found to be at medium or high risk of flooding, the FRA should fully consider the need for flood resilience and emergency planning measures.

### Sustainable drainage

87 The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy 5.13 and draft London Plan policy SI.13. Where greenfield runoff rates are not feasible and robust justification is provided, a discharge rate of three times greenfield rate may be acceptable.

88 The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measures at the top of the drainage hierarchy set out in London Plan Policy 5.13 and draft London Plan Policy SI.13. Roofs and new public realm areas present an opportunity to integrate SuDS such as green and blue roofs, tree pits, bioretention and permeable paving into the landscape, providing amenity and water quality benefits.

### Water efficiency

89 The residential components of the development should achieve a water consumption of less than 105l/person/day, in line with London Plan policy 5.15 and draft London Plan Policy SI.5. Any non-residential components of the development should achieve the equivalent of an 'Excellent' rating on the water elements of BREEAM, in line with draft London Plan policy SI.5. Water reuse should be

considered for inclusion in the development to meet both water efficiency and sustainable drainage requirements.

### Urban greening

90 The proposal to improve urban greening by improving the quality of the pedestrian environment and the creation of new public spaces is strongly supported in line with London Plan Policy 5.10 and draft London Plan Policy G5. This should be assessed against the Urban Greening Factor model in Table 8.2 of the draft London Plan.

### Transport

91 Transport for London will require a robust Transport Assessment (TA) to be prepared as part of any planning submission in accordance with TfL's Transport Assessment Best Practice Guidance, which is moving to a 'Healthy Streets' based assessment.

92 The TA should contain a multi-modal trip generation assessment. Public transport trips generated by the development should be split by time of travel, mode and direction of travel. LU and bus trip generation should be further disaggregated. LU services should be split by line i.e. Bakerloo line and Northern line south and northbound, under the reasonable assumption that the large majority of LU trips are to/from Elephant and Castle. Kennington Station is more capacity constrained and residents should be encouraged to use Elephant and Castle, particularly after completion of the new Northern Line Ticket Hall (NLTH). Bus demand should be split by corridor, rather than individual routes.

93 Depending on the likely development impact, TfL may seek mitigation measures / contributions to maintain or enhance the surrounding transport network. Cumulative impacts will need to be considered, given the high level of development in the area, so a base line will need to be agreed.

94 Given the site's relatively 'illegibility' from the surrounding streets, an audit of pedestrian and cycle routes to and from the site to the main existing networks should be undertaken, with improvements identified, for example providing a 'level' walking route to/from Elephant and Castle by funding a raised table at the junction of Dante Road and Longville Road, to complement the recent improvements to Churchyard Row. The site would benefit from integration into the local Legible London sign network, which would benefit visitors to the Cinema Museum in particular. TfL will be able to advise further.

95 The development is proposed to be 'car free' with the exception of nine disabled Blue Badge (BB) car parking spaces, representing a 3% provision. This is a minimum level in draft London Plan policy terms, but is likely to be acceptable, given the site constraints and location near to a multi-modal interchange that will be greatly improved in terms of physical accessibility with the new NLTH project, recent northern roundabout removal and the shopping centre redevelopment. All Blue Badge spaces should have electric vehicle charging provision, given the small number.

96 As was mentioned at the meeting, vehicle tracking (BB and service vehicles) will need to be provided, and interaction with pedestrians and cyclists will need to be considered, as the main vehicle site access routes are also the main pedestrian access points and will therefore need safe separation. A lower number of BB spaces may be acceptable if there are clear benefits for pedestrians and cyclists. Depending on the assessment of servicing requirements, it may be appropriate to control delivery hours and on-site vehicle access where possible, to avoid peak pedestrian and cycle movements. The context for this is the Mayor's 'Vision Zero' accident reduction target.

97 Cycle parking should be provided in accordance with the draft London Plan minimum standards and the London Cycle Design Standards. Access to the site by bike will need to be considered in the TA, both in terms of building access - interaction with servicing vehicles and pedestrians in particular - as well as wider network connection as mentioned above. Adequate visitor cycle parking for the Museum will need to be provided.

98 Local expansion of Cycle Hire may be required, particularly as the site lies on the very edge of the hire area and given the presence of the Cinema Museum. Section 106 funding may be sought for this and TfL will be able to advise further.

99 A parking management plan (PMP) will be expected as per draft London Plan policy, explaining how BB spaces will be managed, and should also consider cycle parking. The BB spaces should only be for BB holders, and should not be made available for non BB holding drivers. The TA should provide an outline of the PMP.

100 As mentioned above, servicing, in particular the non-managed home deliveries, will need to be provided for without adverse impact on the public realm and pedestrian and cycle safety. The TA will need to provide further information on this, including vehicle tracking plots. An outline deliveries and servicing plan, for subsequent approval, should accompany the planning application. Restrictions on size of vehicle and times of on-site access may be appropriate in order to minimise adverse impacts on the public realm and pedestrian/cycle safety, in line with 'Vision Zero'.

101 An outline construction logistics plan (CLP), for subsequent approval and in line with TfL guidance should accompany the planning application. Construction traffic routing, measures to minimise vehicle movements and protection of pedestrian and cycle safety will be of particular interest, in the context of 'Vision Zero' and close proximity of the site to Cycle Superhighway 7. The applicant should engage with the Elephant and Castle Developers' Forum which is led by Southwark Council and TfL.

102 An outline travel plan should accompany the planning application, for subsequent approval. The travel plan should contain measures for 'peak spreading' of arrival and departures to reduce peak impacts on the Northern line and bus services (for example by providing crowding information), encouraging walking and cycling in particular (healthy modes), for example pool bikes and initial 3 year Cycle Hire membership for new residents (one fob per household), and managing personal deliveries (for example off-site Amazon lockers).

103 As was mentioned at the meeting, the site lies directly over an LU tunnel so LU Infrastructure Protection (LUIP) team will need to approve the construction methodology. A condition of any subsequent planning approval will be sought to this effect. The applicant should continue to liaise with LUIP as the designs progress and the construction methodology is refined.

104 Mayoral CIL (MCIL) will be payable at the rate of £60 per square metre following introduction of MCIL2 from 1st April 2019.

105 TfL provides its own pre-application advice service, further details on which can be found on the TfL website. The applicant is encouraged to take advantage of this service to discuss the issues raised in this report in more detail, particularly the car parking and servicing arrangements.

## **Conclusion**

106 GLA officers welcome the opportunity to engage with the applicant and strongly support the principle of the redevelopment of this site. Further work is however required in relation to urban design to demonstrate exemplary design. Further information should also be provided with regard to heritage, climate change and transport as discussed in this report, and further discussions with the

Council and the GLA are encouraged on affordable housing prior to submission. Officers would be content to review any design amendments or other detailed information, when it becomes available.

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for further information, contact the GLA Planning Team:  
**Hermine Sanson, Principal Strategic Planner (Case Officer)**  
020 7983 4290 email: [hermine.sanson@london.gov.uk](mailto:hermine.sanson@london.gov.uk)

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## Appendix 2

27<sup>th</sup> February 2018

### **To Whom It May Concern**

#### **Woodlands Nursing Home, Dugard Way, SE11 4TH – RELOCATION OF MHOAD SERVICES**

Please find below details regarding the relocation of the MHOAD services operated at Woodlands by the South London and Maudsley (SLAM) NHS Foundation Trust.

#### **Existing Use**

The facility was previously used as a nursing home for Lambeth and Southwark older adult residents with functional illness and dementia. However, the facility was closed in approximately 2013 and has remained vacant and surplus to the Trust's requirements ever since.

#### **Reasons for the Service Vacating**

In recent years the Mental Health of Older Adults and Dementia Clinical Academic Group (CAG), supported by commissioners, invested in a greater range of community based services in all boroughs which have had the impact of reducing admissions to CAG inpatient facilities. Accordingly the change in the culture of how mental health patients are treated has resulted in a decline in the need for acute and long term in-patient beds and, therefore, much reduced demand for buildings such as the Woodlands Nursing Home.

#### **Re-provision of the Service**

In consultation with the CCG and User Groups some of the Lambeth residents at Woodlands were transferred to Greenvale Nursing Home in Streatham, whilst Southwark residents were transferred to Ann Moss Domus in Rotherhithe. In addition, other patients were transferred to alternative providers in their respective communities where their needs were more suitably provided for.

#### **Impact on Services**

As it is almost five years since Woodlands was closed there will be no impact on residents who are referred to the Trust' service and no impact on staff.

Please feel free to contact me if you have any queries or would like to discuss further.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Vanessa Smith', written in a cursive style.

Vanessa Smith  
Service Director  
Telephone: 0203 228 1630

NHS Lambeth Clinical Commissioning Group and  
South London and Maudsley NHS Foundation Trust

Redesign in Older Adults Specialist Mental Health Continuing Care

## 1. Introduction

NHS Lambeth Clinical Commissioning Group (Lambeth CCG) and South London and Maudsley NHS Foundation Trust (SLaM) agreed a proposal to change specialist mental health continuing care. The proposal responds to the Quality, Innovation, Productivity and Prevention (QIPP) initiative established by the Department of Health to improve quality of care and make best use of health funds. The specialist mental health continuing care QIPP is included in Lambeth CCG's business plan for 2013/14 and forms part of the Lambeth CCG's Mental Health Improvement Programme.

This work has been carried out cognizant of Lambeth CCG's values of telling the truth, being fair and open, recognising responsibilities to service users and the wider public, and to act responsibly as a public sector organisation.

This report provides the Lambeth CCG Board with the rationale behind the specialist mental health continuing care QIPP proposal, and full details of the joint work that has supported the recommendation being presented to the Board for ratification.

## 2. Continuing healthcare

'NHS continuing healthcare' means a package of ongoing care that is arranged and funded solely by the NHS, where the individual has been found to have a 'primary health need' as described in the National Framework for NHS Continuing Healthcare and NHS-funded Nursing Care 2012 Revised<sup>1</sup>.

Once assessed as being eligible for NHS funded continuing care, it is the responsibility of a Clinical Commissioning Group (CCG) to commission either a residential placement or a home care package for the patient. Patients are reviewed initially after 3 months and annually thereafter. At review it may be evident that the patient's care needs have changed and therefore the care required may need to change which could include the place of care or the care package offered.

In 2012/13 Lambeth CCG made 120 residential placements. The majority of these (86%) were within private sector nursing homes – 60% in Lambeth, and 26% out of borough.

Lambeth CCG also commissioners continuing care beds from two local NHS providers. These are historic block contact arrangements with:-

- South London and Maudsley NHS Foundation Trust (SLaM) who run Greenvale and Woodlands Continuing Care Units
- Guy's and St Thomas' NHS Foundation Trust who run Minnie Kidd House

Very few CCGs directly commission NHS providers to provide NHS funded Continuing Healthcare, with the majority of these placements occurring within the private or voluntary sector.

<sup>1</sup><https://www.gov.uk/government/publications/national-framework-for-nhs-continuing-healthcare-and-nhs-funded-nursing-care>  
NHS Lambeth Clinical Commissioning Group (LCCG) and South London and Maudsley NHS Foundation Trust (SLaM) – redesign in older adults specialist mental health continuing care

The focus of this paper is on the QIPP initiative lead jointly by Lambeth CCG and SLaM. The following section provides a brief description of the current SLaM continuing care provision and activity levels.

## 2.1 SLaM specialist mental health continuing care

### *Woodlands*



This building provides 38 places (28 for Lambeth residents) in a stand-alone facility in Kennington close to the Elephant and Castle. The building was built in the 1990s by Lambeth Healthcare as part of the Tooting Bec closure and transferred to SLaM in 1999. It is the largest inpatient unit in SLaM and the design of the building provides 4 wings of between 9 and 10 beds each. There are no en-suite facilities as the design pre-dates NHS requirements for single sex accommodation. Gender segregation is therefore achieved by zoning the corridors and wings into male and female only areas. The remaining 10 beds are for continuing care patients placed by Southwark CCG.

There are currently 12 beds occupied.

### *Greenvale*



This building provides 28 places in a stand-alone facility in Streatham. The building was built in the 1990s by Lambeth Healthcare as part of the Tooting Bec closure and transferred to SLaM in 1999. The design of the building provides 3 corridors onto a central communal sitting and dining room with all the accommodation located on the ground floor. There are no en-suite facilities as the design pre-dates NHS requirements for

There are currently 23 beds occupied.

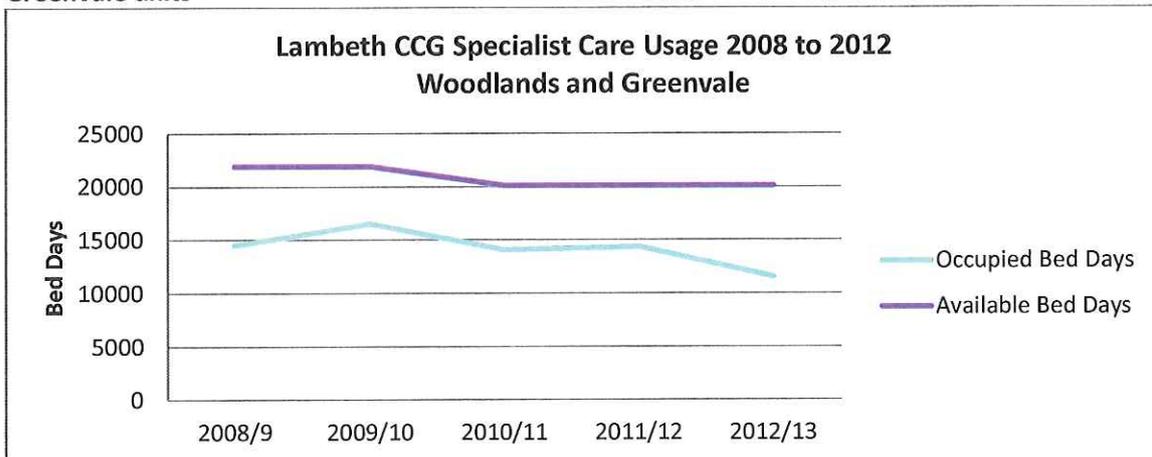
In addition to those residents originally transferred from long-stay hospitals, historically people have been admitted to the SCUs for the following reasons:

- admissions via the acute inpatient units, when it became apparent that a person has longer term needs
- admissions from care homes via acute inpatient units due to severe distress, or behavioural and psychological symptoms of dementia
- admission for people with long term mental illness such as schizophrenia and bipolar affective disorder with treatment resistant symptoms
- admissions for those with learning disability or alcohol related problems presenting in a crisis

Many of these admissions resulted in long term and often indefinite placements, continuing after the original behaviours and symptoms had disappeared. Currently there are a number of people in the SCUs with low or moderate psychiatric needs and often their primary problems are physical frailty, illness and dependency.

Over the past 5 years there has been a steady decline in the bed usage at both units – this is detailed in the table 1.

**Table 1: A comparison of available bed days and occupied bed days 2008-2013 at Woodlands and Greenvale units**



Both units have carried a number of vacant beds for some time and bed occupancy continued to fall. In 2012/13 Lambeth CCG de-commissioned 9 beds at Woodlands as part of the SLaM QIPP programme.

Discussions between the Mental Health of Older Adults and Dementia Academic Group (MHOA CAG) and commissioners on changes in demand for mental health continuing care services, the need to support and maintain good practice in Lambeth care homes for all people with dementia and challenging behavior, and the need to address financial challenges within the NHS concluded

NHS Lambeth Clinical Commissioning Group (LCCG) and South London and Maudsley NHS Foundation Trust (SLaM) – redesign in older adults specialist mental health continuing care

that these services should form part of the joint SLaM and Lambeth CCG QIPP programme for 2013/14.

## **2.2 Southwark CCG QIPP**

Southwark CCG is also undertaking a similar QIPP programme. Following the closure of Beckett House in 2011, Southwark CCG and SLaM have been placing patients in one of the wings at Woodlands, however Southwark CCG are now planning to focus their specialist continuing care provision solely in Southwark on the Anne Moss site. A reassessment programme similar to the one described below is currently being undertaken by SLaM and Southwark CCG which will result in patients being moved on from Woodlands either into Anne Moss or alternative provision.

## **3. Case for change**

### **3.1 Future Need**

The Lambeth Joint Strategic Needs Assessment (JSNA) for Older Adults (65 years and over) 2011/12 reports 8% (22,700) of Lambeth's total resident population (approx. 279,000) is aged 65+. Projections show the percentage of older people aged 65+ in Lambeth is set to increase from 2014-15 onwards growing to 10% (35,000) by 2033. The 65+ population is set to increase by up to 16.5% by 2025 and the 85+ population by 18%.

The JSNA further reports the actual number of people with dementia on a GP register as 895, however it is predicted the number of people with dementia is higher at approximately 1,500, and will increase exponentially with the ageing population. People with enduring mental illness are now living longer with quite often with a range of other long term conditions.

### **3.2 Clinical context and service redesign**

In the last 15 years, national policy has driven a substantial change in the delivery of care to people with complex mental health needs with an emphasis on independence and choice. Care is now more focused on person-centred treatment of dementia and functional mental illness, i.e. schizophrenia, bi-polar affective disorder and severe depression, and less reliant on pharmacological intervention. Care is no longer seen as institutionalised in a hospital based environment, but more likely to be provided in the community and in a person's home or place of residence. Clinical care is planned and preventative rather than addressing crises, and is a dialogue with patient and relative, both addressing current need and considering future care.

In response to national policy, Lambeth CCG has invested in local services to enable early detection, better planned and supportive person-centred care.

Lambeth CCG have jointly commissioned a new memory service with Southwark CCG. Kings Health Partners with SLaM as the lead provider established this service in 2010. The function of the service is to increase early diagnosis of dementia and provide support people with dementia and their carers in planning to remaining independent; to commence cognitive enhancers working jointly with the patient's GP as part of shared care protocol, to work with other statutory and voluntary sector providers to prevent crisis with ongoing care and support. Lambeth currently sits in the top 10% nationally for early diagnosis of dementia<sup>2</sup> and with the additional investment of support to GP practices in early detection, it is hoped to improve this further.

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<sup>2</sup> [www.dementiaprevalencecalculator.org.uk](http://www.dementiaprevalencecalculator.org.uk)  
NHS Lambeth Clinical Commissioning Group (LCCG) and South London and Maudsley NHS Foundation Trust (SLaM) – redesign in older adults specialist mental health continuing care

Although there are increasing numbers of people with dementia, fewer people are presenting in crises requiring emergency admission. This is due in part to the early intervention work of the integrated Memory Service previously mentioned but also Community Mental Health Teams, who are also diagnosing people with dementia at an earlier stage and working with relatives and carers to provide appropriate support and interventions to prevent crises.

Lambeth CCG has also supported the introduction of a pilot Home Treatment Team for older adults that safely support people with complex mental health problems and their families at home or their place of residence, during crises.

Lambeth CCG also makes 'quality' (CQUIN - Commissioning for Quality and Innovation) payments to local acute hospitals (Guy's and St Thomas' Hospitals and King's College Hospital) to support improved recognition and care to people with dementia and their carers and to ensure there is dedicated clinical knowledge available in the hospital to support best clinical care.

This range of preventive services has resulted in a reduced need for SCU admission for people with dementia and severe functional disorders (mood disorders and schizophrenia). Crises can often now be averted and patients can be either managed at home, in a care home or discharged directly from acute units, rather than having an additional stay in a SCU.

### 3.3 Development of Nursing Home Provision in Lambeth

There are currently 10 registered nursing homes in Lambeth providing approximately 600 beds. All have undergone CQC inspections within the past 12 months and all, except one, meet the required CQC standards. The home which does not meet the standards is currently embargoed and Lambeth CCG has not placed any patients there within the past 6 months.

The All Party Parliamentary Group (APPG) on dementia states *"A well supported care home could mean reduced use of antipsychotic drugs and avoidance of unnecessary hospital admissions, thus saving costs and improving quality of life"*.

The Joint Commissioning Panel for Mental Health (JCPMH) guidance for commissioners of dementia services (2011) states *"(Specialist mental health services)... will provide care home liaison on a proactive, in-reach basis to prevent inappropriate admissions to hospital. As well as this the service will provide education, training and coaching to care home staff to enable them to recognise, prevent and manage challenging behaviours more effectively"*.

Many services elsewhere in the country have successfully moved to this model of care for people with dementia<sup>3</sup>. The JCPMH, the APPG, the Alzheimer's Society, and Royal College of Psychiatrists and the British Psychological Society advocate community based treatments rather than long term institutional care.

Lambeth CCG commissions a range of support services to nursing homes in the borough – these include the Care Home Support Team and St Christopher's Hospice. Lambeth CCG also funds Local Enhanced Services at a value of £300,000 for primary care services which enables GPs to provide specific sessions in the homes.

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<sup>3</sup> Older persons mental health services in Lancashire, Nottinghamshire, the Isle of Wight, Reading, Hertfordshire, Richmond and Barking and Dagenham have all reduced bed numbers and set up services to support people in their own homes or care homes. NHS Lambeth Clinical Commissioning Group (LCCG) and South London and Maudsley NHS Foundation Trust (SLaM) – redesign in older adults specialist mental health continuing care

Support to care homes is also part of the Southwark and Lambeth Integrated Care Programme and Lambeth CCG recognises the need to work closely with care homes, health and social care providers and residents and their families to ensure the best quality care is given. An important part of this redesign work will be the development of additional support to care homes to enable care home staff to continue to look after people when their behaviour becomes more challenging, and to prevent unnecessary admissions to acute hospitals.

With the release of funds from the redesign of specialist mental health continuing care, Lambeth CCG will commission specialist mental health support to care homes that reflects the JCPMH need for a pro-active, in-reach service that provides education training and coaching to care home staff to better manage dementia and challenging behaviour. This will form part of a wider piece of work that Lambeth CCG will be undertaking jointly with Southwark CCG to provide a more integrated model of support to care homes with clearly identified improved outcomes for residents.

The remaining specialist mental health continuing care unit will provide focused and intensive care to those with complex mental health needs. There will be a higher level of skill in the staff providing care to residents, reflecting the specialist nature of the continuing care provision.

### 3.4 Financial rationale

Lambeth CCG currently contracts continuing care beds on a block contract, a lump sum payment to SLaM, however the number of actual occupied beds has been reducing with current occupancy across both units at 63%. This means Lambeth CCG is paying for beds no longer in use. The occupancy will continue to reduce as regular assessments become more systematic and patients move onto more suitable care settings.

The following modeling indicates:

- the proposed gross savings following consolidation to one site
- reduction to the gross savings of indicative cost of increased support to care home
- reduction to gross savings of the cost of NHS funded continuing care that is not specialist mental health, following assessment (re-provision)

Financial modeling	£cost*	£savings*
Savings following the closure of one unit and consolidation to one site		1,450,000
Increased support to Lambeth care homes	300,000	
Ongoing NHS funded continuing care for older people that is not specialist mental health, following assessment	400,000	
	<b>Net savings</b>	<b>750,000</b>

(\*Please note all figures are approximate)

## 4. Equality

### 4.1 Equality impact assessment

An Equality Impact Assessment (EIA) was carried out by SLaM in 2012 to assess the impact of implementation of the regular assessment as part of National Framework. The outcome indicated the service would support equality in and equity of service and no group would be disadvantaged.

An EIA will be carried out following consolidation of continuing care to one site and the introduction of support to care homes to demonstrate support to care homes has further improved quality and equality of care.

An EIA was carried out by SLaM in August 2013 as part of the redesign of continuing care, focusing on impact on staff. The EIA identified that this service redesign will impact on staff because the new team being created will require a different skill mix with a higher proportion of qualified staff than currently employed in the existing units. This will mean the unqualified staff, including catering staff, will be more affected. In mitigation SLaM will:

- Apply the Trusts Job Protection Policy and involve the unions to ensure representation is made for the affected staff groups
- Redeploy or TUPE staff where possible, exploring the possibility of engaging with other Kings Health Partners in this process
- Interview process will involve a member of the panel who is not part of Older Adult Services
- All staff will be supported through the Trust Job Protection Policy and staff will have automatic access to the London-wide re-deployment pool and supported by dedicated HR support
- Additional support offered to staff will be interview-preparation and master-classes

The following sections outline the various stages and processes used to determine which site is recommended to provide the service and has been divided into the following headings:-

- Patient needs assessment
- Governance
- Engagement with patients, families and other stakeholders
- Building assessment

## **5. Patient Needs Assessment**

### **5.1 Assessment process**

In accordance with National NHS Continuing Healthcare guidance, all patients assessed as eligible for full NHS funded healthcare must be assessed 3 months after initial assessment and annually thereafter. Assessments are carried out by the multidisciplinary team including nurses, doctors, therapists and psychologists and should involve family and carers or the patient advocate if there is no family involvement.

All patients will be reassessed and this process will be completed by the end of October 2013.

Following the reassessments the patient will fall into one of the following categories:-

- The patient remains eligible for NHS funded continuing healthcare and requires specialist mental health support and will remain in the SLaM unit with reassessment as per continuing care guidance as outlined above
- The patient remains eligible for NHS funded continuing healthcare but does not require specialist mental health support and be managed in another residential setting with reassessment as per continuing care guidance as outlined above
- The patient requires a further period of assessment
- The patient is assessed as no longer eligible NHS funded continuing healthcare and will require an alternative residential or home care package.

All the assessments and decisions are taken to the Lambeth Older People's Continuing Care panel for discussion and ratification.

## 5.2 Number of assessments

The following sets out the current position on patient reassessments in both the units:-

Number of beds	56
Number of patients requiring assessment (beds occupied)	35
Assessments underway	20
Assessments completed	15
Number of patients remaining in the unit following assessment (to date)	11
Number of patients transferring following assessment (to date)	4

## 5.3 Patient transfers

Information on nursing home provision has been provided by Lambeth CCG and a number of transferred have already taken place. SLaM have provided additional support to patients and families during this transition period which has included SLaM staff working with nursing home staff for a number of shifts to ensure smooth handover of care. SLaM staff will continue to work with nursing home staff and closely monitor the patients transferred and patients will also have access to other nursing home support as outlined in section 3.3.

## 6. Governance

### 6.1 Lambeth CCG and SLaM Joint Governance Group (JGG)

Following discussion between Lambeth CCG and SLaM regarding achieving the Quality, Improvement, Productivity and Prevention (QIPP) programme for continuing care, a Joint Governance Group (JGG) was established in March 2013 to provide oversight to achieving the following continuing care QIPP objectives:

- Consolidation of service to one of two specialist continuing care units in Lambeth
- Increased support to care homes to care for people with challenging behaviour
- QIPP savings of £750,000

The purpose of the JGG is a task and finish group to lead, agree and steer changes to services for people with dementia and severe challenging behaviour, and older patients meeting NHS continuing care criteria in Lambeth provided by South London and Maudsley NHS Foundation Trust, and the development of a behaviour support team for care homes in Lambeth. This includes making recommendations to Lambeth CCG board on the preferred site for the specialist unit.

The JGG is jointly chaired by Liz Clegg, Assistant Director, Older Adults and Client Groups, Lambeth CCG and David Norman Director of Service for Older Adults, SLaM. Membership consists of:

- Clinical leads – Dr. Daniel Harwood, Consultant Psychiatrist and Helen Kelsall, Inpatient and Specialist Care Service Manager, providing expert opinion regarding patient care, patient safety and staff relations
- Carer/family representatives – Susan Scarsbrook (Greenvale) and Marcia Davis (Woodlands), observing the meeting and providing carer/family view of assessment and scoring of both continuing care units
- Commissioning and programme management – Jennifer Burgess, Integrated Commissioning Manager Older Adults, Lambeth CCG; and Sharon Ravenscroft, Programme Manager, SLaM, providing and applying project planning, project management and service redesign

- Engagement - Nuala Conlan, Engagement, SLaM; Catherine Flynn, Engagement, Lambeth CCG; Kate Radcliffe, Communications, South London Commissioning Support Unit, providing interface with key stakeholders, press and support with communication

The JGG report regularly to the Lambeth Mental Health Improvement Board, Older Adults Clinical Advisory Group and SLaM contract monitoring group, and regularly update Lambeth CCG's Director of Integrated Care and the Board lead for Mental Health.

## **7. Engagement with carers/families, staff and other stakeholders**

The JGG prioritised early engagement with:

- Carers/families of residents
- Staff
- Scrutiny Committee, local MPs and Councillors
- Other interested stakeholders

One of the priorities for the engagement process was to explain the rationale for consolidation on one site, the decision making process that would be used to determine which the preferred site would be and how the final decision would be made.

### **7.1 Carer/family engagement**

Carer/family engagement started 14 and 16 May respectively at Woodlands and Greenvale. There have been eight meetings to date, and include Skype for a family member in the USA to join discussions. Notes are taken at the meetings and distributed to all carers/families for information.

JGG co-opted a carer/family representative from each unit to join the JGG as observers from July. The co-opted members then participated in the decision regarding weighting the criteria as part of AEDET. A sub-group was established to review both units and make a recommendation to the JGG, led and facilitated by an external consultant, and co-opted carer/family representatives were members of the sub-group.

Two submissions were received from individual carer/family members and the joint response from JGG was sent to all carer/families. Those individuals who had made submissions asked for further clarification and detail on some of the responses and this was provided direct to them via email and telephone.

All carers/families had contact information provided in notes and at meetings if they wished to raise individual concerns about the redesign process.

### **7.2 Staff engagement**

Regular staff meetings at both units started in June between senior management, Human Resources department, staff and Union representatives, regarding the proposed closure. A staff support group has been established, SLaM counselling service has been offered, and SLaM Chaplaincy service is also available to staff. A Question and Answer (Q&A) sheet was prepared for staff providing information on the process. Formal consultation with staff commenced on Friday 16 August 2013.

### 7.3 Other local stakeholders

The redesign proposal and process was discussed at the Older People's Partnership Board on 17 July with interested local stakeholders including Lambeth Pensioners Action Group (LampAG) and the Alzheimer's Society.

### 7.4 London Borough of Lambeth

The Local Authority Scrutiny Committee has been informed of this QIPP programme and a briefing was sent to Lambeth MPs and Councillors on 2 July 2013. To date no questions have been raised.

### 7.5 Media

One request for comment was received by SLaM from South London Press and a response was provided by the Communication Lead for South London Commissioning Support Unit on 2 July 2013. An article was published in the South London Press on the 4<sup>th</sup> July 2013. To date no further questions have been raised.

### 7.6 Feedback from engagement process

A number of concerns were raised at carer/family meetings. The key themes are summarised below along with responses.

#### ***Carers/families concerned that decision regarding which unit to close had already been made***

The JGG communicated the process to make a recommendation regarding which unit to close at carer/family meetings. Communication focused on the open process to objectively judge the two units (AEDET) for a recommendation. The process and scoring was presented at August carer/family meetings by the independent consultant involved.

Carer/family representatives were involved in both the weighting and scoring process.

#### ***Carer/families asked how their views are taken into account in decision process***

One carer/family representative from Greenvale and one from Woodlands were co-opted onto the JGG in July as observers. The two representatives participated in the weighing of each criteria within the AEDET, agreed additional Lambeth specific criteria based on feedback from both carer/family groups and participated in the assessment and scoring of both units as members of the sub-group.

#### ***Carers/families and Alzheimer's Society raised concerns about safety and care of people being transferred to another place of care as previous experiences of transfers were deemed poor***

SLaM have reassured carers and families at the regular meetings and confirmed to Alzheimer's Society that any moves will be carried out using guidance from National Framework for Older People, Department of Health 2001<sup>4</sup>, British Geriatric Society Best Practice Guidance for the Transfer of Care of Frail Older People for Community Health and Social Support, 2012<sup>5</sup> and recent learning from moving patients to other care settings.

Additionally, individual discussions with the Consultant Psychiatrist and psychological support to carer/family members have been offered.

<sup>4</sup> <https://www.gov.uk/government/publications/quality-standards-for-care-services-for-older-people>

<sup>5</sup> <http://www.bgs.org.uk/index.php/topresources/publicationfind/goodpractice/46-gpgdischarge>

NHS Lambeth Clinical Commissioning Group (LCCG) and South London and Maudsley NHS Foundation Trust (SLaM) – redesign in older adults specialist mental health continuing care

### ***Carers/families concerns regarding level of care in local care homes***

Lambeth CCG confirmed the level of additional support to local care homes already in place (enhanced GP service, Care Home Support Team) and clarified as part of the proposed consolidation to one site, that specialist mental health support to care homes is being established.

## **8. Building assessment**

### **8.1 Process in reaching the recommendation as to which building to use for continuing care**

The JGG agreed to use the DH Achieving Excellence Design Evaluation Toolkit (AEDET) to assess both units. AEDET is a national toolkit created by DH to assess buildings using weighted criteria across a number of fields, for example environment, engineering, use, access, space etc. Each criteria can then be scored. AEDET had been used in Lewisham for a similar exercise to determine the best physical environment for continuing care and was recommended to the JGG.

JGG also reviewed the Kings Fund Enhancing the Healing Environmental Assessment Tool and considered Alzheimer's Society Design for a Dementia Care Environment. It was agreed both these tools would support design ideas in the refurbishment phase. Additionally, Guy's and St Thomas' NHS Foundation Trust (GSTT) has received funding to improve the hospital environment for people with dementia and their carers and future refurbishment will incorporate learning from the GSTT improvement programme.

The AEDET weighting process to prioritise particular criteria was carried out on the 5<sup>th</sup> of July at the regular JGG meeting and included feedback from carer/family meetings as well as incorporating comments from the carer/family observers in attendance.

Additionally, Lambeth specific criteria were added based on carer/family feedback at meetings:

- Therapeutic space available - rooms for Namaste and groups
- Building location to main roads – safety of residents if they leave the building
- Ability to move freely through the unit, the 'flow' of communal space - if not rated elsewhere
- Local facilities close to the building - café/hairdresser/ shop
- Access to open green space external to the building
- The environment creates a sense of community

The JGG agreed a sub-group should be established to assess and score the two units using the agreed weighted criteria. It was decided the sub-group would be independently led by an external consultant and involve objective opinion. The sub-group would assess and score each unit against AEDET agreed criteria. The outcome of assessments would be reported to the JGG.

The sub-group membership consisted of:

- Julia Shelley, Independent Consultant, health and social care
- Dr Amanda Thompsell, Consultant Psychiatrist, SLaM
- Delores Williams, Modern Matron – Nursing expert (SLaM)
- Sarah Burleigh, Nursing Directorate – Executive nursing (SLaM)
- Bill Marsden, Estates expert (SLaM)
- Susan Scarsbrook, Carer representative, Greenvale
- Marcia Davis, Carer representative, Woodlands
- Sharon Ravenscroft, Programme Manager (SLaM) provided support to the sub-group

The sub-group met on 31<sup>st</sup> July and visited and reviewed both units using the AEDET.

## 8.2 Outcome of AEDET scoring exercise

Criteria	GREENVALE	WOODLANDS
Character and innovation	4.8	2.8
Form and materials	4.6	4.0
Staff and Patient environment	4.5	3.2
Performance	3.3	2.5
Engineering	2.7	2.0
Use	3.9	3.0
Access	5.0	4.0
Space	4.1	3.4
Additional Lambeth factors	4.7	3.6
<b>TOTAL (max 54)</b>	<b>37.6</b>	<b>28.5</b>

From a total available score of 54 Greenvale scored 70% and Woodlands scored 53%

The sub-group reported they felt the assessment tool and scoring system helped the group reach a clear conclusion. It was an interesting lesson in how much the physical environment impacts on the quality of life for residents and staff. The original narrative on the AEDET had been re-drafted by the independent consultant to make it more user-friendly and reduce the jargon and the sub-group agreed this made the process easier.

The sub-group reported it was an excellent mix of professionals and carer/family representatives and this aided a wide ranging discussion.

SLaM Finance Department provided indicative modeling of savings per building if closed. The modeling indicated a similar level of saving for each unit. Therefore building-related savings were not a consideration in the recommendation of which unit to close.

## 8.3 Endorsement of AEDET sub-group

The recommendation of the AEDET subgroup that the new service model should be developed on the Greenvale site was discussed and endorsed by the JGC at a meeting on the 2<sup>nd</sup> August 2013.

## 9.0 Recommendation

### Recommendation:

**Based on the outcome of the sub-group assessment of the two continuing care units, the Joint Governance Group recommends to the Lambeth Clinical Commissioning Board the de-commissioning (closing) of Woodlands Unit and consolidating specialist mental health continuing care services at the Greenvale unit.**

The recommendation of the JCG has been shared with the relatives groups at Greenvale and Woodlands in writing and in person at the latest round of relatives meetings on the 12<sup>th</sup> and 14<sup>th</sup> August 2013 and staff at the same time.

### 10. Next steps

Subject to Lambeth CCG board ratification of the recommendation, the JCG is proposing the following next steps:-

Action	Timeframe
Formal staff consultation and any necessary redundancies	August – November 2013
Planning and achieving the move of patients assessed as requiring specialist mental health continuing care from Woodlands to Greenvale	September – November 2013
Development of a service specification for Greenvale specialist mental health continuing care unit incorporating national guidance and evidence from best practice	September – December 2012
Development of the service specification for an integrated 'team to support care homes' incorporating national guidance and evidence from best practice	September – March 2014
Planning refurbishment of Greenvale	April 2014 on-going
Equality impact assessment of specialist mental health continuing care unit and specialist mental health support to care homes	April – June 2014

Report prepared by:-

Lambeth CCG and SLaM Joint Governance Group

20<sup>th</sup> August 2013