

# Stop the Blocks Community Action Group



5 January 2022

## **APPLICATION TO DEMOLISH A BUILDING UNDER PART 31 OF THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 1995 (AS AMENDED)**

### **Application Site: Former Woodlands Nursing Home**

Dear Sir

I write with regard to the above-mentioned application to demolish the Former Woodlands Nursing Home at Dugard Way, London, SE11 4TH. I understand that the applicant proposes to carry out the demolition in February 2022 and an application has been submitted to London Borough of Lambeth Council for determination as to whether the prior approval of the Local Planning Authority is required for the method of demolition and any proposed restoration of the site in respect of the property.

As of this date, no application is visible with regards to these works on the local planning authority website with which further details can be reviewed or comments submitted.

The applicant within their planning statement for Lambeth Planning Application Reference (21/04356/FUL) at paragraph 6.3.1 has stated while the care home is vacant it sits within use Class C2 and is afforded in principle protection through policy. Therefore, we wish to set out some preliminary concerns on this matter on behalf of Stop the Blocks Community Action Group who are also contesting the planning application for the site (21/04356/FUL). Our main concerns are that the applicant has not:

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1. Demonstrated that there are urgent health and safety issues that justify its demolition.
2. Secured a planning permission to replace the building.
3. Demonstrated if the building is unsafe or uninhabitable, this is in part because the applicant has not explored re-using it for a care home or other use. Additionally, the building is currently habitable as it has been and it is still occupied by live in guardian residents for a number of years providing those live in guardians with a home.
4. Demonstrated how the embodied carbon loss in the existing building will be mitigated.

The London Plan still seeks to retain community uses such as this. It is clear that the applicant is only seeking to demolish the building to remove one of the material considerations in the current planning application.

The application site also sits within the Renfrew Road Conservation Area and therefore it should not be permitted unless and until a replacement is approved. A levelled site is a blight in a Conservation Area, and only if the existing building is considered not only to not contribute to the Conservation Area but to cause harm to the Conservation Area, and this harm is worse than the existing building, could demolition be considered acceptable. We understand that from the County Hall island site demolition determined by Lambeth Council that the demolition of an existing building was sought by the applicant. The prior demolition of the existing building was refused permission and in this case the planning application for its replacement was also refused consent when evaluated upon its own merits.

Where a proposal involves the demolition of a residential property and the redevelopment of the whole site, the proposal must be considered against Lambeth Local Plan (2021) policies H1, H3, H5, Q2, Q5, Q6, Q7 and Q8 and any other relevant policies including those detailed in paragraphs 9.2, 9.31, 9.35 and EN7.

Also, adherence should be met to the policies set out in the London Plan (2021) on Sustainable Design and Construction Supplementary Planning Guidance and The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance.

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Given that the nursing home is also adjacent to several Grade II and locally listed buildings reference should be made to Historic England who produce best practice guidance notes on the historic environment and sustainable design and construction.

This application for demolition should not be granted consent or proceed any further until all of these matters identified have all been addressed.

Yours sincerely

**[Stop the Blocks Community Action Group](#)**