

House/Flat
Address Line 1
London
Postcode
11th November 2022

Jeffrey Holt
Planning
London Borough of Lambeth
PO Box 734
Winchester
SO23 5DG

Dear Mr Holt

21/04356/FUL | 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 central residential block ranging in height from 3 to 14 storeys, and peripheral development of part 1, part 2, part 3 and part 4 storeys, to provide 126 residential units, together with servicing, disabled parking, cycle parking, landscaping, new public realm, a new vehicular and pedestrian access, and associated works | Woodlands Nursing Home 1 Dugard Way LONDON SE11 4TH

1. This representation is an addendum to my representation dated 7th October and covers the material uploaded to the Lambeth Planning portal/website.
2. I would note that it has been difficult in certain documents to establish what has changed as there has been no signposting to any changes.
3. I would again like to begin by stating that I do not object in principle to the development of the Woodlands Nursing Home site. A site such as this with the potential for the provision of new homes should not have been disused for so long. However, I do **object strongly** to the type and form of the proposed development.

Revised information

4. The applicant appears to have redrawn some of the elevation drawings and floor plans.
5. The provided roof plan (LSK-GRID-00-15-DR-A-PL114 rev P02) indicates a lift overrun on the east side of the tall block but this is not shown on the revised eastern elevation. The applicant has not provided floor plans for the top habitable (assumed 14th) floor of the block, nor have they provided sections through the block. As a result, it is not possible to confirm whether or not the lifts serve the top floor. If the lifts do serve this floor then there will be a lift overrun which will be higher than the roof of the tall block.
6. Given the lack of trust in the community of the applicant and their agents, plans of the top habitable floor and sections through the tower should be provided to validate the applicants claim that the tower height will only be the 47.6m claimed on the elevations.

Tall building

7. Notwithstanding that the applicant is clearly 'gaming' the policy by appearing to be just lower than the tall building threshold. The Indicative Levels Plan - Sheet 1 of 2 (D3055 00 XX DR 4001 P01) indicates that existing ground levels vary from 3.13m AOD to 3.56m AOD.
8. Using the 47.6m height on the elevations, the tower is below the 45m threshold by between 500 and 700 millimetres. Whether or not this building is a tall building, a building less than 1m lower than the tall building will have the same effects and impacts on the local community as a building just over that threshold, but the local community has far less protection through planning policy.
9. This is exactly the scenario that residents pointed out to Lambeth during the examination of the local plan. Lambeth did not act on those concerns.
10. It is perhaps worth noting that just across the borough border in Southwark, 'tall' is defined in its local plan as above 30m.
11. As set out in my objection letter of 7th October 2022, the multiple negative effects arising from this proposal are detrimental to the local community, whether or not the building is defined as 'tall'.

Viability Assessment addendum

12. A redacted viability assessment addendum running to two pages has been submitted. This would not appear to be adequate to explain the substantial reduction in affordable housing provision from the originally submitted proposal, and the lack of compliance with policy which requires proposals on public land (which this was before it was purchased by the applicant) to provide 50% affordable housing (London Plan policy H5).
13. I would refer to the Parkhurst Road Limited v Secretary of State case which concluded that if an applicant has overpaid for a site, that is not a reason to seek to avoid obligations under planning policy.

Conclusion

14. **On the basis of the analysis contained within this addendum representation and my representation dated 7th October 2022 I respectfully request the London Borough of Lambeth to refuse planning permission for this proposed development.**

Yours sincerely

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CC: Florence Eshalomi MP

Councillor Claire Holland, Leader of Lambeth Council

Councillor Jacqui Dyer, Deputy Leader of Lambeth Council and Kennington Ward

Councillor David Amos, Kennington Ward

Councillor Liam Daley, Kennington Ward

Marina Ahmad, London Assembly Constituency Member, Lambeth and Southwark