

Conservation Adviser

Direct line

**THE VICTORIAN SOCIETY**  
The champion for Victorian and Edwardian architecture

Your reference: 21/04356/FUL

Our reference: 171470

20<sup>th</sup> December 2021

Dear Mr Holt,

**RE: 21/04356/FUL Woodlands Nursing Home 1 Dugard Way London, SE11 4<sup>TH</sup> 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 five to 14 storeys, and peripheral development of part 3, part 4 storeys, to provide residential units, together with servicing, disabled parking, cycle parking, landscaping, new public realm, a new vehicular and pedestrian access, and associated works. Information for the purposes of consultation: The development would include 155 residential units comprising 5 x studio, 91 x 1-bed, 47 x 2-bed, 12 x 3-bed units**

Thank you for continuing to consult the Victorian Society on this application. It has been reviewed by Southern Buildings Committee, a panel of experts in their field which the Society consults on important and difficult cases. In consideration of their advice we continue to **object** to this proposal.

This application involves the redevelopment of the site previously occupied by the Lambeth Hospital. Although many of the historic building associated with the hospital and previous workhouse have been demolished, the Grade II listed Water Tower and Master's House, as well as the locally listed Porter's Lodge and Male Receiving Ward, remain. These make a strong contribution to the site's character and historic legibility, as well as to the wider Renfrew Road Conservation Area and Lambeth's Victorian history.

The Victorian Society is not opposed in principle to the redevelopment of the former Woodlands Nursing Home site. However, the amendments to the proposals for the site do not address the concerns we previously identified. Proposed building A continues to be a tall building (one that would be '*substantially taller than their surroundings, [and] cause a significant change to the skyline*' London Plan 7.25) that would cause harm to the setting of a listed building. Despite the reduction height from 29 to 14 storeys it would continue to dominate the former Water Tower and Master's House, especially as it is now proposed to be closer to these two heritage assets than in the previous proposals. This concern is noted in the planning appeal report which

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states at paragraph 33: *'The proposed tower, despite its architectural quality but given its height and scale, would not respect the existing character of the surrounding area and would not contribute to the future character of the wider area.'*

We appreciate the changes which have been made to the design of the tower: the inclusion of brick cladding and arches. However, they do not address our primary concern which is the height and scale of the proposed development. This concern is shared by the Planning Inspectorate who in their appeal decision to the previous proposal stated:

*'The Woodlands Nursing Home site is identified in a schedule of developable large sites for years 11-15 as being a site that could accommodate 90 housing units. The Council has not at any time suggested that the site is not suitable, and is clearly intending to allocate it, for housing. It is likely, therefore, that market housing and affordable housing will be built on the site in the future, though not to the same quantum as considered in this decision. Such a development could secure public benefit without causing unacceptable harm and could secure the future long-term use of The Master's House by the Cinema Museum.'*

Furthermore, University College London's authoritative research on the environmental performance of taller buildings highlights the rapidly increasing rates of energy use and CO2 emissions per sq.m, as buildings rise from an optimum of compact development at 6 floors, virtually doubling by the time buildings get to 20 storeys. Lambeth Council proudly claim to be the first borough to have declared a climate emergency. To put this into practice it should considered the environmental impact of higher buildings on this site. <https://www.ucl.ac.uk/bartlett/energy/news/2017/jun/ucl-energy-high-rise-buildings-energy-and-density-research-project-results>

This concern over the height and density of development also extends to new lower blocks and their proximity to buildings on Renfrew Road. Although these blocks are of medium height they would be discernibly taller than surrounding historic buildings and would overbear the smaller scale urban fabric here.

The NPPF states clearly that heritage assets are an *'irreplaceable resource'* (para 189) and that the sustaining and enhancement of their significance is desirable (para 190a). Likewise, it states that *'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.'* These proposals do not enhance the significance of the heritage assets within and bordering the site, nor do they better reveal the significance of the Conservation Area. The height and density of development would rather detract from their significance, dominating the heritage assets and the existing low rise character of the Conservation Area. The Victorian Society **object** to the proposals.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

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