

# Caroline Pidgeon MBE AM

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26 June 2020

Alison Bell  
Case Officer  
The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Dear Ms Bell

Appeal reference: APP/N5660/W/20/3248960  
Appeal by: Anthology Kennington Stage  
Appeal Site Address: Woodlands Nursing Home, 1 Dugard Way, LONDON  
London Borough of Lambeth reference: 19/02696/FUL

## **Submission to the Secretary of State on the former Woodlands Nursing Home site**

I am writing to express my opposition to this appeal and to set out my concerns about this application.

It is my understanding that the Lambeth Local Plan Policy H2 requires at least 50 per cent of new homes to be affordable where public subsidy is available, or 40 per cent without public subsidy. The housing mix in this planning application equates to 43.8% of all flats being affordable – yet it is a planning application that has been supported by public funds through the Mayor of London's Homes for Londoners Land Fund. This level of affordable housing is clearly below the requirements of Policy H2.

The Lambeth Local Plan also requires that the policy tenure mix for affordable housing tenure is 70% affordable rent and 30% intermediate. Yet as the developer's plans stand, the tenure mix for affordable housing in the planned development is quite the reverse – at 21% affordable rent (a mere 24 units) and 79% intermediate. There appears to be no clear justification for this clear disparity between the requirements of the Lambeth Local Plan and the proposed development.

This development also proposes an approach whereby the social rented provision is solely in Block A, which is directly opposed to the development plan aspiration have mixed tenures in the same building. Block A effectively serves as the mechanical and electrical servicing centre, bin store and cycle shed for Block B. Additionally, much of the social rented housing has the poorest outlook including single aspect flats. I am very concerned that this development seeks to promote a "poor doors" distinction that will only serve to create unnecessary community division and demonstrates a profound disrespect for those of lower means.

Furthermore, the proposed development also fails to meet the indicative size mix required for affordable housing by Lambeth SHMA (Lambeth SHMA 2017 for 2018 Local Plan). 37% of the proposed units are 1 bed units (including both "studio" and 1 bed units according to floor plans, although distinction is unaccounted for in other information provided), against the requirement of 30 or 35%. 63% proposed units are 2 bed units, against the SHMA requirement of 43 or 45%. This means that no units are proposed to meet 3 and 4 bed unit need. Overall, the current plans

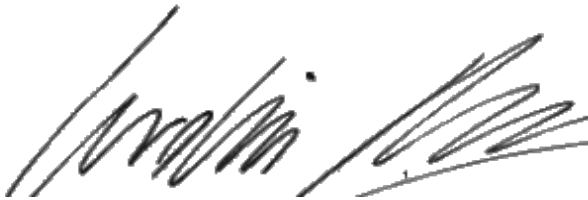
suggest, by SHMA requirements, a huge over-provision of 2 bed units – while they make no contribution to the continued and pressing need for affordable housing that meet the needs of families.

Finally, the lack of transparency around this proposed development is also a cause for serious concern. While my understanding is that an affordable housing financial viability statement has been submitted, it is not available on the website for review by the public – which is contrary to advice in the NPPF (paragraph 58). Given that this development is planned for build on former public land, funded in part by a loan of public funds, it is not acceptable to provide the public with such a limited degree of scrutiny.

It is for all these reasons that I urge the Secretary of State to reconsider this planning application, which I believe fails on many counts, to meet the requirements of the Lambeth Local Plan nor deliver in the interest of the public.

I believe to allow this development to progress would set a dangerous precedent

Yours sincerely,

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Caroline Pidgeon AM  
Liberal Democrat Assembly Member