

Woodlands Nursing Home 1 Dugard Way London SE11 4TH

Local Planning Authority: Lambeth

local planning authority reference: 21/04356/FUL

Strategic planning application stage 1 referral

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

The proposal

Redevelopment of the former Woodlands and Master's House site, retaining the Master's House and associated ancillary buildings; demolition of the former care home; the erection of a central residential block ranging in height from 5-14 storeys, and peripheral development of part 3, part 4 storeys, to provide 155 residential units, together with servicing, disabled parking, cycle parking, landscaping, new public realm, a new vehicular and pedestrian access, and associated works.

The applicant

The applicant is **Anthology Kennington Stage Limited** and the architect is **GRID Architects**.

Strategic issues summary

Land use principles: The principle of the redevelopment of the under-utilised and well-connected site is supported. Confirmation on the terms of acquisition of the Cinema Museum for the current application is required prior to the Mayor's decision at Stage II.

Housing: 40% affordable housing by habitable room with a tenure split of 60% LAR and 40% intermediate shared ownership is proposed (offer subject to grant). The application does not meet the Mayor's threshold of 50% affordable housing on public land and must follow the Viability Tested Route. GLA officers are scrutinising the viability assessment to ensure the maximum quantum and affordability of the affordable housing.

Urban design and heritage: The overall massing strategy is broadly supported although comments should be addressed in relation to development form, residential quality and public realm. The scheme will result in less than substantial harm to the significance of designated heritage assets which will need to be outweighed by public benefits of the proposal once confirmed by Stage II.

Other issues on **sustainable development, transport and environmental considerations** also require resolution prior to the Mayor's decision making stage.

Recommendation

That Lambeth Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 120. Possible remedies set out in this report could address these deficiencies.

Context

1. On 26 November 2021 the Mayor of London received documents from Lambeth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
 - 1A *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
 - 1C(c) *“Development which comprises or includes the erection of a building that is more than 30 metres high and is outside the City of London.”*
3. Once Lambeth Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

5. The proposed development relates to a 0.7 hectare site bound by Renfrew Road and Dugard Way (an internal road which forms part of the site) to the west and south. To the south and east are residential blocks that were redeveloped as part of the redevelopment of the former hospital site. To the east is George Mathers Road and to the north is Castlebrook Close, which comprises two storey residential development.
6. The site forms the remaining part of the former Lambeth Hospital site and is currently occupied by Woodlands, a former nursing home (Use Class C2) which is now vacant and Master's House, a two-storey Grade II listed building, which is currently occupied by the Cinema Museum. The remainder of the site is taken up by service roads and scrubland. The site was previously owned by the NHS.
7. The southern portion of the site is within the Renfrew Road Conservation Area. There are also a number of heritage assets adjacent to the site, including two locally listed lodges which frame the entrance gates into the site from Renfrew Road to Dugard Way, and the Water Tower is also Grade II listed. There are further listed buildings close by on Renfrew Road, including the former Lambeth Magistrates Court and Fire Station buildings and former Court Tavern. Elliot's Row, West Square and Walcot conservation areas are also located near the site to the north and north-west.
8. 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 Major Town Centre; along with the Central Activities

Zone (CAZ). The site falls within an Air Quality Focus Area and Flood Zone 3, in an area benefitting from the Thames Tidal Defences.

9. The site has a Public Transport Access Level (PTAL) range of 6a to 6b, on a scale ranging from 0 to 6b where 6b represents the greatest level of access to public transport services; and is served by five high frequency bus routes within a five-minute walk of the site, along with Thameslink National Rail services and London Underground Services from Elephant and Castle Station a 10-minute walk from the site. The nearest section of the Transport for London Road Network (TLRN) is the A3204 Kennington Lane, located 930m to the south.

Details of this proposal

10. The proposal is for the demolition of the former care home and the construction of a central residential block ranging in height from five to 14 storeys, and peripheral development of part 3, part 4 storeys to provide 155 residential units (40% Affordable Housing by habitable room, split 60:40 London Affordable Rent (LAR) to intermediate shared ownership). The proposal also includes servicing, Blue Badge parking, cycle parking, landscaping, public realm improvements and associated works.
11. The Grade II listed Master's House and associated ancillary buildings would be retained. As part of this application, a commitment has also been made by the applicant to sustaining the future of the Cinema museum, which currently leases the Master's House.

Case history

Previous application

12. On the 24th July 2019, the applicant applied for planning permission to Lambeth Council for the redevelopment of the former Woodlands and Master's House site (GLA ref: 4963, LPA ref: 19/02696/FUL). The proposal included the retention of Master's House and ancillary building; demolition of the former care home; the erection of buildings up to 29 storeys to provide 258 residential units, together with servicing, parking, cycle parking and associated works.
13. Following an appeal for non-determination, on 7 January 2021 the Planning Inspectorate dismissed the appeal, addressing issues with density, impact to the setting of heritage assets, housing mix, surrounding residential amenity, proposed standard of accommodation, amenity space and play space.

Current proposal

14. The revised proposal includes a redesign of the appeal scheme. The main changes include:
 - Changes to building layout, footprint and main route through the site;
 - Reduced height of the taller blocks from 29 storeys to 14 storeys with changes to materials and design;
 - Reduction in density, from 258 units to 155;

- The refused application proposed to deliver 50% affordable housing with public subsidy (with a tenure split of 31% affordable rent and 69% shared ownership). The current offer is 40% affordable housing with grant (split 60% London Affordable Rent and 40% intermediate shared ownership); and,
 - Revisions to the unit mix to include additional market sale 3-bedroom units and 1bed units within the affordable rental housing.
15. A pre-application meeting for a revised proposal was held with the applicant's team and GLA officers on 8 July 2021. The applicant was advised that the provision of affordable housing must be maximised with the use of GLA grant funding explored. It was advised that any future planning application must clearly detail a package of public benefits to clearly outweigh the harm caused to surrounding heritage assets. Whilst amendments to layout, massing and height from the appeal scheme were generally welcomed, comments relating to design should be considered and further detail was required in terms of transport and sustainable development with any future application.
16. There is no other relevant strategic planning history associated with this site. However, relevant to this case is planning permission 97/01751/FUL which grants consent for the "conversion and change of use from hospital to a cinema museum with ancillary car parking".

Strategic planning issues and relevant policies and guidance

17. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Lambeth Council's Local Plan (2021) and, the London Plan 2021.
18. The following are also relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance;
 - The Affordable Housing and Viability SPG
 - On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#)."
19. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
- Good Growth - *London Plan*;
 - Housing - *London Plan*; *Housing SPG*; *the Mayor's Housing Strategy*; *Play and Informal Recreation SPG*; *Character and Context SPG*;
 - Affordable housing - *London Plan*; *Housing SPG*; *Affordable Housing and Viability SPG*; *the Mayor's Housing Strategy*; *Good Quality Homes for All Londoners draft LPG*;

- Urban design - *London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG;*
- Strategic views - *London Plan, London View Management Framework SPG;*
- Heritage - *London Plan;*
- Inclusive access - *London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;*
- Culture - *London Plan; Mayor's Cultural Strategy;*
- Health facilities - *London Plan; Social Infrastructure SPG; the Mayor's Health Inequalities Strategy;*
- Sustainable development - *London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance LPG; London Environment Strategy;*
- Fire safety - *London Plan; draft Fire Safety LPG; draft Evacuation Lifts Guidance; draft Fire Statement Guidance.*
- Air quality - *London Plan; the London Environment Strategy; Control of dust and emissions during construction and demolition SPG;*
- Transport and parking - *London Plan; the Mayor's Transport Strategy;*
- Biodiversity - *London Plan; the London Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG;*

Land use principles

Housing

20. London Plan Policy H1 seeks to increase London's housing supply and sets Lambeth a 10-year housing completion target of 13,350 homes for the period 2019/2020 to 2028/2029. Policy H1 prioritises housing delivery on suitable, brownfield sites with high public transport access levels, that are located within 800 m of a town centre boundary and public sector owned sites. The site has a high PTAL rating ranging between 6a and 6b and is also situated near the Elephant and Castle Opportunity Area and Major Town Centre boundary. Optimisation of the existing under-utilised and well-located site for housing delivery is supported by London Plan Policy H1.
21. The proposal would deliver 155 new residential units that will contribute towards the delivery of London's housing requirements and the Council's minimum target which is strongly supported. The site must, however, demonstrate that development optimises site capacity – being the most appropriate form and land use for the site, which is further discussed from paragraph 39 of this report. As the site is public land, the redeveloped site should deliver its full potential in terms of its affordable housing provision.

Cinema museum

22. London Plan Policy HC5 seeks to protect existing cultural venues and facilities. The Masters House has a protected use (in so far as the associated planning permission restricts permitted changes of use within the same use class) which is for a Cinema Museum (see site history section of this report). It is proposed as part of this development that the Cinema Museum be placed on a permanent lease or other form of permanent solution. As previously determined by GLA officers, the applicant's commitment to protect the Cinema Museum and secure its future along with an active use for the Grade II listed building is strongly supported. Application 19/02696/FUL included an offer of a 999- year lease to the Cinema Museum at a peppercorn rent, for a premium of £1 million. It is noted that the protection of the Cinema Museum was also identified as a positive benefit afforded moderate weight by the Planning Inspector.
23. The applicant should provide details of the offer discussed with the Cinema Museum Board of Trustees prior to Stage II referral. As previously conveyed to the applicant, confirmation on the terms of the acquisition is required for the current application to demonstrate it would support a long-term sustainable business model for the museum. The agreed terms to ensure the Cinema Museum's long-term future should then be secured appropriately.

Health facility

24. London Plan Policy S1 resists 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 to meet future population needs or to sustain and improve services. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered unless this loss is part of a wider public service transformation plan.
25. In addition, London Plan Policy S2 requires boroughs working with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision to maximise health and care outcomes.
26. The nursing home for Lambeth and Southwark older adult residents at Woodlands ceased to operate in 2013 and has remained vacant and surplus to the South London and Maudsley NHS Trust since then. GLA officers have previously determined the loss of the health facility to be acceptable. In addition, the Planning Inspector determined that the loss of the nursing home would be a neutral matter with no harm caused in this respect. Accordingly, in this instance, GLA officers raise no further strategic concern with the loss of the nursing home.

Summary

27. The principle of the redevelopment of the under-utilised and well-connected site is supported. Confirmation on the terms of acquisition of the Cinema Museum for the current application is required prior to the Mayor's decision at Stage II.

Housing

Affordable housing

28. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35% (by habitable room), or 50% for public sector land. Schemes can follow the fast-track viability route and are not required to submit viability information nor be subject to a late stage viability review if they meet or exceed the relevant threshold level of affordable housing on site without public subsidy; are consistent with the relevant tenure split; meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant; and demonstrate that they have taken account of the strategic 50% target and have sought grant to increase the level of affordable housing.
29. Policy H6 of the London Plan sets out a preferred tenure split of at least 30% low cost rent (London Affordable Rent or social rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority taking into account relevant Local Plan policy. It is the expectation, however, that the remaining 40% is weighted towards affordable rented products. Lambeth's Local Plan specifies that the delivery of affordable housing should follow the threshold approach set out in London Plan Policy H5 and that 70% of new affordable housing units should be low cost rented homes and 30% should be intermediate products.
30. The Mayor's Affordable Housing and Viability SPG identifies a threshold for the Fast Track Route of 50% affordable housing for schemes on public land, without public subsidy. This recognises the potential for development on surplus public sector land to make a higher contribution to affordable housing delivery than private land. This threshold applies on this site as the site was formally owned by the NHS.
31. The applicant proposes to deliver 40% of the scheme by habitable room as affordable housing (34.2% by unit) with a tenure split of 60% affordable rent (London Affordable Rent) and 40% intermediate shared ownership which is not directly in accordance with Lambeth Local Plan policy. The applicant has indicated that this offer would be subject to grant funding. As such, the application does not meet the Fast Track Route threshold of 50% affordable housing. The application must therefore follow the Viability Tested Route, which requires the application to be supported by viability evidence and early and late-stage viability reviews to be secured as set out in Policy H5 of the Mayor's London Plan and in the Mayor's SPG.
32. A Financial Viability Assessment (FVA) has been submitted with the application and is currently being robustly scrutinised by the GLA Viability Team to ensure the maximum amount of affordable housing is secured and to agree on a suitable tenure split with products that are genuinely affordable. The affordable offer will therefore require further discussion prior to consideration by the Council at Committee, once the GLA Viability Team has completed its assessment.
33. The minimum level of affordable housing and tenure mix will need to be secured. In addition, the affordability of the proposed products must also comply with the requirements of Policy H6 of the London Plan, the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report and should be secured in the S106 agreement. Further information on the affordability of units should be

provided, for instance rent levels. An early-stage review and a late-stage review will be required in accordance with Policy H5 of the London Plan to optimise affordable housing delivery in accordance with strategic policy objectives. GLA officers request early engagement into the wording of the draft S106 agreement to ensure appropriate wording for review mechanisms, as well as obligations around delivery of affordable housing.

Unit mix

34. The mix of units proposed is as follows:

| | Studio | 1-bedroom | 2-bedroom | 3-bedroom | Total |
|----------------------|--------|-----------|-----------|-----------|-------|
| Market | 4 | 66 | 28 | 4 | 102 |
| Intermediate | 1 | 13 | 10 | 0 | 24 |
| Low-cost rent | 0 | 12 | 9 | 8 | 29 |
| Total units | 5 | 91 | 47 | 12 | 155 |
| Percentage | 3.2% | 58.7% | 30.3% | 7.7% | 100% |

35. London Plan Policy H10 encourages a choice of housing based on local needs with affordable family housing being a strategic priority. It is also acknowledged that a higher proportion of one and two bed units are generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. In addition, Policy H4 of the Lambeth Local Plan expects low cost rented element of residential developments to provide no more than 25% of 1-bedroom units, 25-60% of 2-bedroom units and up to 30% of 3-bedroom units. For market and intermediate housing, the policy requires a balanced mix of unit sizes, including family-sized accommodation.

36. Within the affordable rented units, 41.3% would be 1-bedroom, 31% would be 2-bedroom and 27.6% would be 3-bedroom family sized units. The higher proportion of 1-bedroom units, equivalent to four additional one-bed units, would conflict with the local plan unit mix which seeks to include a higher proportion of 2-bedroom units. The non-compliance with local plan requirements and low provision of family sized units when applied to the entire affordable component (15.1%) raises some concerns. GLA Officers also note the Council's comments in relation to the lack of affordable rent one-bedroom units within the previous scheme and the minor weight attributed to this aspect by the Planning Inspector when balanced against viability constraints, the site's PTAL rating and the acute shortage of affordable housing and market housing in London and Lambeth. Notwithstanding this, the applicant must continue to ensure that the proposed unit mix, including the number of affordable family homes, responds to the local need to the satisfaction of LPA officers. GLA officers will report back on the acceptability of the final unit mix at the Mayor's decision-making stage.

Children's play space

37. London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 m² per child. Play space provision should be available to all housing tenures to promote social inclusion. The requirement should be

based on the GLA Population Yield Calculator. The applicant has applied the calculator and based on the GLA benchmark of 10m² per child, this equates to the provision of 456 m² of play space. The applicant has indicated that the objective is to accommodate all of the play space requirements for each age group on site. Currently all play space is accommodated at ground level. It is noted in the landscape strategy that the play provision is a work in progress calculation and the current table and anticipated play provision is indicative only.

38. The final play space proposal must be provided prior to the Mayor's decision-making stage. Clarity regarding how any play space areas have been calculated should be provided with the measured areas overlaid on detailed landscaping plans to provide assurance that the measurements adhere to the *Play and Informal Recreation SPG* definition of being "legitimate". The quality and design of equipment provided in play areas must be secured by planning conditions along with the ongoing availability of all playspace to all children in the development.

Urban design

39. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Optimising development capacity

40. London Plan Policy D3 requires the optimisation of sites by following a design-led approach, having regard to site attributes, local context, design principles, public transport accessibility, and capacity of existing and future transport services. Policy D3 states that optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. As noted in the Inspector's Appeal Decision for the previous scheme 19/02/696/FUL, optimisation is also defined as achieving the maximum amount of housing without causing unacceptable harm.
41. In terms of land use and supporting infrastructure capacity, the proposed optimisation of the site to maximise the number of homes and affordable homes appropriately responds to the intent of Policy D3. The applicant should address the comments below to ensure that the form of the development appropriately responds to the site's context and the criteria set out in Policy D3(D). Also relevant to the determination of site optimisation is the impact on the proposal on heritage assets, discussed from paragraph 61 of this report.

Development form and massing

42. It is positively noted that the overall height of the main building (Block A) has decreased significantly from the previous appeal scheme, resulting in an improved relationship with the surrounding context and performance when tested in key views. The overall massing strategy to incorporate a lower mix of building heights is broadly supported, subject to the proposed scale and heights achieving acceptable residential quality for occupants and neighbours.

43. However, the built form of Buildings B – F generate elevations of significant length fronting both the northern and western boundaries. It is unclear from the submitted documentation whether the recesses between each building are of sufficiently substantial depth to provide visual relief. Further information should be provided to illustrate this.
44. Moving closer to the built form proposals from the south-west, as shown in Dugard Way Kinetic Study View B within the applicant's Heritage, Townscape and Visual Impact Assessment, a large amount of the existing vegetation is lost, car parking bays are introduced (not pictured) and a relatively blank brick façade could present an underwhelming arrival experience to the site. Further information and design development should be submitted to illustrate and improve this area.
45. It is noted that with a maximum height of 44.8m, Building A is defined as a mid-rise building (between 15m and 45m) under Lambeth's Local Plan Policy Q26. Accordingly, the building is not subject to strategic review against the locational or environmental assessment set out in London Plan Policy D9 for tall buildings.

Housing quality and standards

46. Separation distances between buildings remain of concern given that there are various distances below 18m. Further to this, the dimensions stated do not consider fields of vision. There appears to be just 10-12m between Building A and Building C for instance (living rooms of A-02-06 and C-02-02 for example). It must be ensured that occupants have sufficient privacy, using devices such as the arrangement of habitable rooms and (if necessary) screening. Further information should be submitted on this aspect.
47. It is stated that 'a handful of flats that have slightly smaller balconies than required but this is less than a 1 sqm shortfall.' Further clarity should be provided as this is contrary to London Plan Policy D6. The inclusion of the studio flat without a balcony on the top floor of Building D also contravenes Policy D6. Any flats without the required amount of external amenity space should only be accepted in exceptional circumstances, and should be provided with compensatory internal floorspace.
48. Policy D6 also states that housing development 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 Part B in Policy D3 than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating. There appear to be 19 single-aspect west and south facing dwellings across the masterplan (12%). The applicant must justify the inclusion of the single-aspect homes and if single-aspect dwellings are proposed (by exception), the design team should demonstrate how good levels of ventilation, daylight, privacy and thermal comfort will be provided to each habitable room and the kitchen. Overheating and ventilation assessment should therefore be undertaken to ensure appropriate environmental conditions can be provided and maintained.
49. In accordance with London Plan Policy D6(D), the development must ensure that sufficient daylight and sunlight is provided to surrounding housing that is appropriate for its context, whilst minimising overshadowing and maximising the usability of outside amenity space. Separation distances to neighbouring properties should also be carefully considered to ensure adequate privacy and outlook. The Council's assessment in this respect will be reviewed at the Mayor's decision-making stage.

Development layout and public realm

50. Direct access to ground level apartments has not been provided, which appears a missed opportunity to utilise potentially redundant corridor space at ground level, and provide a more active frontage and convenient access for residents. This should be further considered.
51. It is unclear how the access route from Dugard Way to Dante Road will be managed in terms of providing access for fire and refuse vehicles only. For instance, how smaller motorised vehicles such as mopeds would be prevented from travelling through the site if bollards are utilised. The swept path analysis for service vehicles appears to be reliant on an area resembling a car parking space for turning and officers question how this space would be protected from rogue parking.
52. The private and public realm relationship to the existing museum should continue to evolve in line with the ongoing operational requirements of the museum. A clear visual boundary and visual distinction should be established.

Architectural quality

53. The approach to architecture and articulation of the facade does not raise any strategic concerns. In line with London Plan Policy D4, key details, for instance construction details and materials, should be secured as part of any planning application to achieve the highest design quality. The ongoing involvement of the original design team should be conditioned to monitor the design quality through to completion.

Fire safety

54. In accordance London Plan Policy D12, the applicant has submitted a fire statement and strategy which set out the overall approach to fire safety, produced by a third-party assessor. The strategy addresses some of the requirements set out under Policy D12 including means of escape for building users; features that reduce risk to life and access for fire service personnel and equipment. It has been confirmed that fire evacuation lifts will be provided for all building cores as required under London Plan Policy D5 and separate to the firefighting lift required in Building A.
55. Information has not clearly been provided to address the requirements of Policy D12 and the applicant is encouraged to review the draft GLA Guidance Sheets for Evacuation Lifts and Fire Statements to ensure all requirements are adhered to. Details of building construction; provision for fire appliances and evacuation assembly points including site plans; confirmation of water supply; and details in relation to potential future modifications to the building should be provided in line with Policy D12. The applicant should update the statement, consulting the draft fire statement guidance (for information only).

Inclusive access

56. London Plan Policy D5 seeks to ensure that new development achieves the highest standards of accessible and inclusive design. In addition, London Plan Policy D7 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

57. 16 dwellings that are designed to meet Part M4 (3) in accordance with the requirements above. Confirmation should be provided that all other dwellings comply with Building Regulation requirement M4(2) in accordance with Policy D7. The Council should secure M4(2) and M4(3) requirements by condition.

Digital connectivity

58. London Plan Policy SI6 states that development proposals should ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s capable connection is made available to all end users. The Council should therefore ensure that this is provided and secured.

Strategic Views

59. Policy HC3 of the London Plan identifies that Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. In addition, Policy HC4 sets out that development should not harm and seek to make a positive contribution to the characteristics, composition and landmark elements of these views. The London View Management Framework Supplementary Planning Guidance (LVMF SPG) provides further guidance on the management of views. The site falls within the 'field of view' of several LVMF views. However, as shown within the applicant's Heritage, Townscape and Visual Impact Assessment (HTVIA), the proposal will have a negligible impact on strategic views.

Heritage

60. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". In relation to conservation areas, special attention must be paid to "the desirability of preserving or enhancing the character or appearance of that area". If it is judged that harm to the heritage asset(s) would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duties.
61. The NPPF states that when considering the impact of the proposal on the significance of the designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Any harm to a heritage asset should be given substantial importance and weight in any planning balance. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm should be given considerable importance and weight.

62. The NPPF also states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
63. London Plan Policy HC1 requires that development affecting heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail, that the cumulative impacts from incremental change from development on heritage assets and their setting should be actively managed and that development proposals should avoid harm.
64. The application site is partly located within the Renfrew Road Conservation Area. The Grade II listed Master's House is also located within the site boundary. The site is also adjacent to several heritage assets, including the two locally listed lodges which frame the entrance gates into the site and the Water Tower to the former Lambeth Workhouse, which is Grade II listed. The Grade II Listed former Lambeth Magistrates Court, K2 Telephone Kiosk and Fire Station along with the locally listed Former Court Tavern are also situated in the immediate vicinity of the site on Renfrew Road. Further to the north and north-west of the site are several conservation areas, including Elliot's Row, Walcot Square and West Square conservation areas which also contain listed heritage assets – including the Grade II Listed Imperial War Museum. Kennington Conservation Area is also located to the west.

Heritage assets within and immediately adjacent to the site

65. The submitted HTVIA demonstrates that the proposal and in particular the addition of Block A with a maximum height of 14-storeys, would be prominent addition within the Renfrew Road Conservation Area. Block A would be located within the direct background and clearly within the setting of immediate heritage assets including the Grade II Listed former Water Tower, Master's House, and former Lambeth Magistrates Court.
66. The Master's House, the former water tower and the two lodges which frame the entrance gates into the site to the south are the only remains of the former Lambeth Workhouse complex and have an historic and architectural interest due to their rarity. The former Lambeth Workhouse complex also has value with the former Lambeth Magistrates' Court and fire station buildings to Renfrew Road and together form a valuable ensemble of Victorian public/institutional buildings. The retention of the Master's House is welcomed.
67. In comparison to the previous scheme that was dismissed on appeal, the "tower" element of the scheme (previously Block B, now Block A) has generally been shifted to the south / south-west and is now in greater proximity to the Grade II listed Water Tower, albeit that it is significantly reduced in height from the previous scheme. As shown in the kinetic views from George Mathers Road, there remains an extensive loss of the Water Tower's silhouette – both by Building A but also by Building B on the opposite side of the tower. The 10-storey shoulder of Building A continues to extend behind the Water Tower. The light-coloured choice of materials helps to mitigate the impact of the development; however, Block A would reduce the imposing character of the Water Tower and its hierarchy within the local context. The proposals completely obscure the view of the Water Tower from some mid-range views (for instance View 6A). It is the GLA's officers' assessment that as a result, the proposed development would result in less than substantial harm to the significance of

the Water Tower. As previously noted by the Planning Inspector, harm to this asset is of increased magnitude given the Water Tower's rarity.

68. Block A would also be directly behind the former Magistrates' Court and within the setting of the K2 Telephone Kiosk when viewed from Renfrew Road (View 9). The development also appears behind the Master's House as shown in Dugard Way Kinetic Study Views A and B when entering the site from the south-west. As a result of the scale and height of Block A and the proximity to the heritage assets, there would be a degree of harm with the proposed development distracting from the highly articulated and ornamented roofline of the Grade II listed Former Magistrates' Court and the highly ornamented parapet of the Master's House. The blank brick façade of the lower buildings (Buildings B to F) and loss of vegetation also alter the setting of the Master's House and the locally listed lodge and reception buildings. Although there would still be a relatively high degree of visual impact on the above heritage assets, due to the relatively low scale of the surrounding buildings. GLA officers consider that this harm to the significance of the heritage assets and the Renfrew Road Conservation Area to be less than substantial.

Surrounding conservation areas and heritage assets

69. Block A would be visible in views from within the surrounding conservation areas, including West Square, Walcot Square and Elliot's Row. The building would be visible above roof lines of well-preserved terraces in some cases and there would be a notable rise above the existing low-rise townscape (for instance that shown in View 8), amplified by the orientation of the roadways and composition of the townscape. However, in some views (for instance, View 7), the impact of the proposal would also be mitigated by high-rise development beyond. The lighter materials also mitigate the impact of the development.
70. Overall, the development would result in a significant transition from the scale, massing and materiality contributing to the low-rise character of the conservation areas within multiple views and therefore the increased scale and prominence would impact their setting. GLA officers consider that the proposals would result in harm to the significance of the conservation areas and heritage assets within. However, this harm is considered to be less than substantial.
71. No harm is considered to result to the Grade II listed Imperial War Museum, located to the north-west of the site.

Summary and planning balance

72. In accordance with paragraph 202 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, great weight and importance should be attached to harm to designated assets.
73. Although the resulting harm to heritage assets would be contrary to London Plan Policy HC1, the NPPF heritage balance would also be triggered, and in accordance with the NPPF this harm would need to be able to be weighed against the public benefits of the proposal. Officers consider that the continued high levels of proposed affordable housing within the scheme and the retention of the Cinema Museum are public benefits which will be afforded weight in the balance. As the benefits of the proposal are still under consideration and require further information, notably in relation to the final affordable housing provision and confirmation of offer to protect the

cinema museum, officers will report back at the Mayor's decision-making stage. The results of the assessment by the Council on the proposals' impact on heritage assets will be reported to and taken into account by the Mayor at Stage II.

Transport

Healthy Streets

74. The development will be accessed by foot and cycle via Dugard Way and Dante Road. The link between the two accesses will be a 'shared space' between pedestrians, cyclists, and a limited number of vehicles, however vehicles will not be able to use this as a through-route, other than refuse and emergency vehicles. A contribution towards off-site Healthy Streets improvements would be supported, should the Council have any requirements/schemes locally.
75. Legible London signage should be integrated into the site, way-marking the site and Cinema Museum. The integration of signage into the site was discussed at the pre-application stage. A sum of £16,000 should be included in the s106 agreement to fund two new signs on-site and a local existing sign map update.

Public transport impact

76. Given the relatively small number of trips predicted, c. 50-60 peak hour trips distributed across a range of public transport services, the development is unlikely to have a severe adverse impact on public transport capacity.

Cycle parking

77. The applicant is providing a total of 260 long stay spaces and 5 short stay spaces, which is compliant with draft London Plan minimum standards. However, only 10% of the long stay provision is 'Sheffield stand' type accessible parking, which is contrary to local policy (Policy T3) requiring 25% provision.
78. The cycle stores are distributed around the buildings. It is not immediately obvious from the plans if the cycle stores have internal doors, so this should be clarified. Ideally, cycle stores are accessed internally via residential entrance lobbies, to improve personal and bike security. Any doors that are required to be passed through with a bike should be powered, so this should be clarified.

Cycle hire

79. In line with local policy T3, £160,000 should be secured through the s106 agreement to fund the provision of additional cycle hire docking points in the area. The nearest docking stations lie on the edge of the zone, so experience higher than normal demand, and there is a gap in the docking station network in this location. The applicant should also provide a three-year cycle hire membership to the first residents (one fob per household).

Car Parking

80. The development will only provide car parking for disabled persons, which is strongly supported. The London Plan requires Blue Badge (BB) parking to be provided for 3%

of dwellings from the outset and evidence that an additional 7% can be provided if there is demand. This equates to the provision of five BB parking spaces from the outset, with evidence that a further 10 can be provided subject to demand. The transport assessment only mentions five BB spaces provided on-site, however given the high PTAL rating, edge of CAZ location, and general very low car ownership and thus BB uptake in inner Lambeth, this is considered acceptable. All BB spaces on-site will be provided with electric charging capabilities. This should be secured by condition in accordance with Policy T6 of the London Plan.

Servicing and Construction

81. The development proposes one loading space for deliveries and one space for the museum. This is adequate for the relatively low level of servicing trips predicted (24 vehicles per day).
82. A Construction Logistics Plan (CLP) should be secured by condition, prepared in line with TfL guidance. Given the amount of development in the Elephant and Castle area, the applicant should engage with the Elephant and Castle development forum, which aims to coordinate and minimise the impacts of construction activity in the area and is jointly lead by LB Southwark and TfL.
83. The site lies directly over a London Underground (LU) tunnel (Northern line), so a condition should be imposed to require LU to approve any demolition, excavation, piling and/or construction methodology, should permission be granted.

Sustainable development

Energy strategy

84. An energy statement has been submitted with the application which details that air source heat pumps (ASHPs) are proposed. Although broadly compliant with London Plan policies, the applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. The applicant's response to GLA's energy comments should be provided directly within the Energy Memo provided to the applicant and Council.
85. The applicant should submit the GLA's [Carbon Emission Reporting spreadsheet](#).

Be Lean

86. Further clarification is required as to the proposed reduction in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. The applicant should also consider and minimise the estimated energy costs to occupants. Specific details on this have been provided to the applicant and Council.

Overheating

87. Further information and clarifications on the overheating assessment is required. Specific details on this have been provided to the applicant and Council.

Be Clean

88. The applicant has contacted the three nearest heat network operators regarding existing or planned district heating networks within the vicinity of the proposed

development. Two providers have confirmed that it would not likely be feasible to make a connection. The applicant should continue to request a response from the third provider and contact other relevant stakeholders, including the borough energy officer and nearby developers to pursue local heat network connection opportunities. Evidence of the correspondence should be submitted.

89. The applicant is proposing a centralised ASHP system for blocks A, B, C and in apartment exhaust air ASHP for blocks D, E and F. The applicant should review the energy strategy and seek to propose a site-wide heat network supplied by a centralised energy centre. It should be confirmed that all apartments and non-domestic building uses will be connected to the heat network. A drawing showing the route of the heat network linking all buildings/uses on the site should be provided alongside a drawing indicating the floor area, internal layout and location of the energy centre.
90. The applicant should provide a commitment that the development is designed to allow future connection to a district heating network. This should include a single point of connection to the district heating network. Drawings should be provided demonstrating space for heat exchangers in the energy centre, a safe-guarded pipe route to the site boundary, and sufficient space in cross section for primary district heating pipes where proposed routes are through utility corridors.

Be Green

91. The applicant is not proposing to install any PV across the development which is disappointing. The applicant should reconsider the PV provision and should provide a further detailed roof layout demonstrating that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV, such as plant space or solar insolation levels. The applicant is expected to situate PV on any green/brown roof areas using biosolar arrangement and should indicate how PV can be integrated with any amenity areas. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met.
92. The applicant should provide further information on the proposed heat pumps, including details of energy output and performance/efficiency calculations. Specific details in relation to the above has been provided to the applicant and Council.

Other energy matters

93. The applicant should confirm the carbon shortfall in tonnes CO₂ and the associated carbon offset payment that will be made to the borough. This should be calculated based on a net-zero carbon target for domestic and non-domestic proposals using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.
94. The applicant should review the ['Be seen' energy monitoring guidance](#) to ensure that they are fully aware of the relevant requirements to comply with the 'be seen' policy. A commitment should be provided that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This will be secured through suitable legal wording. Further details relating to submission have been provided to the applicant and Council.
95. The applicant should complete and submit the Good Homes Alliance Early Stage Overheating Risk Tool.

Whole Life Carbon

96. The Whole Life-Cycle Carbon Assessment (WLC) provided by the applicant is welcomed. However, further information is required to fully address London Plan policies. The applicant needs to provide the excel version of the GLA WLC template and provide information in relation to estimated WLC emissions along with material quantity and assumptions. Full details of the WLC requirements have been provided to the applicant and the Council.

Circular Economy

97. London Plan Policy SI7 requires major applications to develop Circular Economy Statements. There is no Circular Economy Statement submitted at this stage. The Applicant must provide a detailed Circular Economy Statement at this stage as per the London Plan policy and GLA guidance.
98. The Circular Economy Statement must include information in relation to the development description, strategic approach, key commitments, bill of materials, recycling and waste reporting, operational waste, plans for implementation, an end-of-life strategy for the building, appendices and a Post Completion Report. These details should be provided prior to determination of the application. Full details have been provided to the applicant and the Council.

Environmental issues

Green Infrastructure and Urban Greening

99. Policy G5 of the London Plan requires that the applicant calculate and provide the Urban Greening Factor (UGF) score for the proposed development and meet the minimum specified target of 0.4. The applicant has calculated the UGF to be 0.38 and is therefore slightly below the 0.4 target for residential development. The applicant should review the urban greening proposed, seeking to improve the quality or quantity, to increase the application's UGF. This should include consideration of whether more existing vegetation could be retained, particularly category B trees. The site is located within an area of nature deficiency.
100. In addition, the applicant must review and clarify whether it is realistic for private gardens to be managed as semi-natural vegetation (as indicated in the UGF table submitted). This should be considered with reference to the guidance provided in Appendix A of the [draft UGF London Plan Guidance](#), which explains that "Species-rich grasslands/meadows should include a range of perennial flowers and grasses that will not be frequently cut."

Trees

101. London Plan Policy G7 sets out an ambition to increase tree canopy provision by 10% across London. 60 trees and two tree groups would be removed to facilitate the proposed development, including 24 category B trees. The proposed planting appears to include approximately the same number of trees as those proposed for removal. It is not clear whether adequate replacement has been provided and this must be demonstrated. The applicant should therefore undertake a comparison of the existing trees on site with the proposed scheme using an appropriate valuation system such as i-tree or CAVAT. Given the extent of tree removals proposed, the applicant should also

review the scheme to increase on-site tree retention. Both reviews should be provided prior to Stage 2 referral.

Sustainable drainage and flood risk

Flood risk management

102. The Flood Risk Assessment (FRA) provided for the proposed development does not currently comply with London Plan Policy SI12, as it does not provide sufficient regard to the risk of tidal breach flooding. The FRA states that 'more vulnerable' residential uses are proposed at the ground floor, which would be set at 3.74m AOD, which is 100mm above the design flood level of 3.64m AOD. Normally a freeboard of 300mm above the flood level is required for more vulnerable uses, but the applicant should seek agreement from the Environment Agency regarding this matter. The FRA proposes flood resilience measures up to 300mm above the proposed flood level, which is supported. However, the FRA does not provide an indication of the type of flood resilience measures proposed. This should be confirmed.
103. Consideration of safe refuge/evacuation procedures should be provided within the FRA. This should then be further detailed in a Flood Warning and Evacuation Plan (FWEP) and should be conditioned.
104. The FRA adequately assesses the risk of flooding from pluvial, sewer, groundwater, and reservoir flooding. When mitigation measures are considered, the residual flood risk to the site is low.

Sustainable drainage

105. The surface water drainage strategy for the proposed development does not comply with London Plan Policy SI13, as it does not give appropriate regard to the greenfield runoff rate and above ground green SuDS.
106. The drainage strategy proposes to restrict runoff to 3.5 l/s for the 100 year event plus 40% climate change. No greenfield runoff rate calculations have been provided, which is required to understand whether the applicant has aimed to reduce the discharge rate as close to the Qbar greenfield rate as practicable.
107. In terms of SuDS, the drainage strategy proposes permeable paving, which is supported. It also states that green roofs are recommended. Further commitment to the inclusion of green roofs and rainwater harvesting should be provided, in line with the London Plan drainage hierarchy. The green roofs should be clearly identified on a plan.
108. No above ground green SuDS are proposed. It appears that there is the potential within the site to include additional SuDS such as rain gardens and/or tree pits. The applicant should revise the drainage strategy to incorporate a range of SuDS to provide the required water quantity, quality, biodiversity, and amenity benefits.

Water efficiency

109. The proposed development generally meets the requirements of London Plan Policy SI5. The applicant should also consider water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit.

110. The Sustainability Statement notes that the proposed dwellings will target a maximum indoor water consumption of 105 l/person/day, in line with the optional standard in Part G of the Building Regulations, and compliant with London Plan Policy SI5.
111. Water efficient fittings and flow control devices are proposed, which is welcomed. The Sustainability Statement notes that green roofs are incorporated, whereas the drainage strategy just states that they are recommended. Consistency should be provided across reports.

Air quality

112. In accordance with London Plan Policy SI1, an air quality assessment has been provided. The proposed development is air quality neutral in accordance with London Plan Policy SI1. However, Policy SI1 also requires that future occupants experience acceptable air quality, ground floor retail exposure must also be considered. The proposal is also located within an Air Quality Focus Area (AQFA), requiring demonstration that design measures have been used to minimise occupant exposure. There are technical queries with the air quality assessment which require addressing prior to determination of compliance with London Plan Policy SI1. Detailed comments have been provided separately to the applicant and the Council.
113. The following conditions are recommended:
 - a. On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards (London Plan Policy SI 1 (D)).
 - b. Measures to control emissions during the construction phase relevant to a high risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D)).

Biodiversity

114. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. The applicant must provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D).

Local planning authority's position

115. Lambeth Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

116. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with

the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

117. There are no financial considerations at this stage.

Conclusion

118. London Plan policies on land use principle, housing, urban design, heritage, transportation, sustainable development and the natural environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land use principles:** The principle of the redevelopment of the under-utilised and well-connected site is supported. Confirmation on the terms of acquisition of the Cinema Museum for the current application is required prior to the Mayor's decision at Stage II.
- **Housing:** 40% affordable housing by habitable room with a tenure split of 60% LAR and 40% intermediate shared ownership is proposed (offer subject to grant). The application does not meet the Mayor's threshold of 50% affordable housing on public land and must follow the Viability Tested Route. GLA officers are scrutinising the viability assessment to ensure the maximum quantum and affordability of the affordable housing. Details in relation to affordable housing provision will need to be secured. Further information should be provided at the Mayor's decision making stage in relation to play space and unit mix.
- **Urban design and heritage:** The overall massing strategy is broadly supported although comments should be addressed in relation to development form, residential quality and public realm. The applicant should address comments in relation to fire safety and inclusive design. Key details relating to architecture, fire safety, inclusive access and digital connectivity should be secured. The scheme will result in less than substantial harm to the significance of designated heritage assets which will need to be outweighed by public benefits of the proposal once confirmed by Stage II.
- **Transportation:** The applicant should address comments in relation to healthy streets; cycle parking provision; cycle hire; and servicing and construction. Contributions towards signage (£16,000) and a cycle hire docking station (£160,000) should be secured along with electric charging capabilities for blue badge spaces and a Construction Logistics Plan. A condition is required in relation to works above the London Underground (Northern line).

- **Sustainable development:** The applicant must address items in relation to energy strategy, whole life carbon and circular economy.
- **Green infrastructure and natural environment:** The applicant must address items in relation to urban greening, trees, biodiversity, sustainable drainage, flood risk and air quality.

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