



LONDON BOROUGH OF LAMBETH

Planning, Transport and Development

Sustainable Growth and Opportunity

**Civic Centre, Planning, Transport and Development, 3rd Floor, 6 Brixton Hill, London,
SW2 1EG**

SUMMARY OF PROOF OF EVIDENCE

of Mr Jeffrey Holt BRTP

Town and Country Planning (Inquiries Procedure) (England) Rules 2000

Appeal by: Anthology Kennington Stage

Appeal site: Woodlands Nursing Home, 1 Dugard Way, LONDON SE11 4TH

Reference: APP/N5660/W/20/3248960

LB Lambeth Reference: 19/02696/FUL

16 October 2020

Summary of Proof of Evidence

The Proof of Evidence was prepared by Jeffrey Holt B RTP. I have worked in two London planning authorities prior to Lambeth and have experience in dealing with a wide variety of planning applications, including numerous major applications.

The Appeal Scheme is the redevelopment of the former Woodlands and Master's House site. The proposed development would retain the Master's House and associated ancillary buildings and construct a 29 storey building and peripheral lower 3/4 storey building to provide 258 residential units with associated servicing, disabled parking, cycle parking, landscaping, new public realm, vehicular and pedestrian access and associated works.

The Local Planning Authority's (LPA) Statement of Case sets out 13 indicative reasons for refusal had the LPA still been able to determine the application. Following the submission of additional information, the LPA's case is now based on eight of the indicative reasons for refusal. My evidence deals with four of these reasons.

Drawing on the evidence of Mr Ian Dias of Schroeders Begg, I conclude that the Appeal Scheme would cause unacceptable harm to the amenity of nearby residential properties due to adverse impacts on their daylight and sunlight. My evidence demonstrates that the proposed residential units would fail to provide acceptable amenity for future occupiers due to unacceptable conditions of overlooking within the development and due to poor levels of daylight, drawing again on the findings of Mr Dias' evidence.

My evidence also shows that in the absence of suitable planning obligations on eligibility, the shared ownership units would not be genuinely affordable to people on a range of incomes below the upper income limit for shared ownership. This is due to the high expected market values of the units within this development.

In addition, my evidence summarises the planning harms identified by the LPA's other witnesses. Ms Barnett's evidence demonstrates that the dwelling size mix would not meet housing need across the Borough. Mr Black's evidence demonstrates that the Appeal Scheme would be out of keeping with the site, its local context and the townscape due to its height, bulk, scale and mass; it would provide a poor public route through the site; and provide poor quality communal amenity space and playspace. Mr Black also explains that the Appeal Scheme would have an adverse effect on the settings of heritage assets resulting in 'less than substantial harm'.

The Appeal Scheme would have a number of benefits. It would provide new housing, but this would be of limited benefit as housing delivery in Lambeth is exceeding its targets. It would also reuse brownfield land, contribute to employment and skills training and provide some transport improvements. However, these would be expected of any major redevelopment of the Appeal Site so these benefits are of limited weight. The Appellant has argued that the offer of a lease to the Cinema Museum is a benefit of the scheme. However it is not a material planning consideration as it has no

connection to the proposed development and securing such an offer through a planning obligation would fail to meet the relevant tests.

The public benefits of the Appeal Scheme are material considerations but they have only limited weight in favour of the development. In addition, the public benefits are not sufficient to outweigh the less than substantial harm caused to heritage assets.

Planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise. The development plan in Lambeth is up-to-date and material considerations do not indicate that permission should be granted notwithstanding the Appeal Scheme's conflicts with the development plan as a whole.