

## Stop the Blocks Community Action Group

### Redevelopment of Former Woodlands Nursing Home, Dugard Way, London, SE11 4TH

**24 MARCH 2023 Update - Short Public Re-consultation-only until Monday 27 March 2023**

Dear Neighbour,

Hope you are keeping well.

Lifestory Group (the developer of the former Woodlands nursing home site) are proposing to build 126 units in back land site in Kennington comprising of 3/4 storey perimeter buildings and a 14-storey block next to the Water Tower and Cinema Museum/Masters House (both Grade II listed buildings within a conservation area.

Lifestory Group has been forced to make a couple of changes to their development proposals but chosen to ignore concerns over the fundamental issues of their plans.

You can find copies of the latest plans, drawings and a copy of the main planning statement all on the [Lambeth Planning portal here](#)

The development proposal is still out of keeping with the lower rise nature of the surrounding urban area. A dense development can be achieved without the tower block and harmful impacts of the perimeter mansion blocks, as demonstrated by the precedent developments at the Bellway Water Tower estate, the Knight's Walk development, 130 – 138 Newington Butts and Manor Place Depot, the latter two of which have a demonstrable higher density.

We want to see a more proportionate and much less harmful redevelopment of the site. We believe the current plans underplay the constraints of the site and harmful impacts which will affect everyone in the local and surrounding areas one way or another. It will also set a minimum baseline and precedent for any future developments in the Lambeth area, particularly as it is outside the Central Activities Zone (CAZ) and regeneration opportunity area of Elephant and Castle in the nearby but distinct regeneration area in Southwark.

#### **Things You Can Do - We need you to take action and help now.**

There is a short public consultation inviting comments from the community running only until **Monday 27 March 2023**. We would encourage you to:

1) Chat with you family, neighbours and friends and raise awareness of the development plans and the issues (more information below)

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2) Please send your comments and objections on the scheme directly to Lambeth Planning Office via their website at [Lambeth Planning online](#) or you can email the Planning Office directly at [planning@lambeth.gov.uk](mailto:planning@lambeth.gov.uk) . You can find the planning application details on the Lambeth Planning website using the Planning Application Reference **21/04356/FUL** and please quote this reference number in all your correspondence. The two recent changes are amendments to the proposed scheme to revise the:

- Plans to include a second staircase/escape route in Block A (the 45m tall building)
- Dwelling size mix i.e., increased quantity of studio, 1 bed flats etc.

3) Send your comments and your concerns to your local ward councillor and MP. Further contact details for the local elected representatives [can be found here](#).

We have seen before that scrutiny, comments and feedback of these proposals can play a significant and useful part in the challenge for a better, a more proportionate, mixed and balanced development for the benefit of new and current residents.

We believe the latest changes coupled with the unaddressed fundamental issues and conflicts with planning policies do not and have not altered the balance in favour of development and planning permission should be refused.

Kind regards

[Your Team at Stop the Blocks Community Action Group](#)

## **Stop the Blocks Community Action Group**

### **Issues with the recent changes**

1) We have long argued for the safety of new residents and specifically in the 45m tall building that there needed to be a second staircase in the tall Block A. There are concerns that placing a second staircase next to the main staircase both of which can only be accessed in the same direction from those leaving their flats does not alleviate the risk if a fire occurs or spreads to that area. It is not a genuine means of exit/escape if there is an issue with a stairwell/staircase if your only means of escape/exit is to have to go in the direction of that risk to escape from it. The second staircase has to be accessible from an alternative direction away from the first staircase to provide a safer alternative exit route.

2) As a result of the second staircase the developer has increased the number of private studio and 1 bed flats while continuing to under provide much needed two and three bed private/market homes needed by the community. Whilst demographics, ownership patterns, the location of the site and its transport links may provide the basis to argue for a higher proportion of one and two bed units in urban locations it does not justify proposing that the majority (57%) of units should be studio and one bed units. The dwelling mix is disproportionate and unbalanced to genuinely meet the community's current and future needs.

### **Fundamental Planning and development issues not addressed.**

None of the fundamental issues and shortcomings of this proposed development in terms of the design, architecture, density, vehicle access, servicing, inadequate amenity for new residents and loss for existing residents, inadequate safeguarding of privacy and overlooking for new and existing residents have been adequately resolved or addressed. The serious loss of daylight and sunlight for residents next to the site of these proposals remains unresolved.

In light of the most recent changes and as of 15 March 2023 there is not an updated viability appraisal open to public consultation to examine the viability of this latest version of the scheme. Its absence does and the opaque heavily redacted earlier versions have prohibited the public from examining why the developer needs to build 126 units on the site and why only 13% of those units will be marketed as "affordable". Also, there is no information to assess whether the private/market or "affordable" market units will be realistically priced for residents in this area.

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### Benefits vs harms-The "Planning balance"

In paragraph 11.10 of the [Planning Statement Addendum \(March 2023\)](#) the planning agent on behalf of the developer summarises the benefits of their development proposals and tries to reason that they outweigh the harms; coupling with some further reasons and sound planning grounds to grant planning permission. Taking those suggested benefits one by one below (developer assertions in italic ) we believe that there are reasons why the proposed development **should not** be approved.

#### ***1. 126 units of housing which includes 21% affordable housing***

Of the 126 units proposed, 109 (87%) of the units are market housing. This is an increase from the 102 units from the scheme submitted in 2021 at the expense of the original quota of "affordable " units proposed. It is wrongly claimed in paragraph 9.5.8 of the Planning Statement-Addendum March 2023 that 20% of units are earmarked as being "affordable". 13% of the total of 126 units are classified as "affordable" .Of the 13% affordable housing units, only 11 units (9% (down from 19% for the scheme submitted in 2021) are affordable rent units (social rented housing), with the remaining 6 (4% which is down from the original 15% put forward) being "intermediate". Additionally, the social rented provision are grouped together in Block F (affordable rented), and part of D (intermediate), which is contrary to development plan aspirations to co-locate all tenures in the same building.

#### ***2. The regeneration of a previously developed site and its highly sustainable location***

The site of the former Woodlands Nursing Home requires redevelopment to provide much needed additional housing. However, the proposed development does not in any way seek to integrate with the surrounding neighbourhood. Instead it provides a 14 storey tower on a site of just 0.54 ha, massively out of scale with its immediate surroundings that will have a detrimental effect on existing listed buildings, and the amenity of dozens of existing homes, many of which, by the applicants own daylight and sunlight assessment would fail to meet the required standards that the proposed development has to meet. This is a development seeking to maximise profit, with the applicant acknowledging the proposal will cause harm to the many existing homes and the residents of those homes. This is not a development "integrating into the surrounding neighbourhood".

Paragraph 124 of the NPPF requires that "Planning policies and decisions should support development that makes efficient use of land, taking into account:... (d) the desirability of maintaining an area's prevailing character and setting". This development proposal does not maintain the area's prevailing character and setting.

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The peripheral blocks present significant overlooking issues for existing residents, particularly on Renfrew Road. The architecture of the peripheral blocks is reminiscent of nearby poor design from the 1980s which is being demolished.

### ***3. Economic benefits for the Borough***

Jobs and apprenticeships are to be welcomed but construction related employment would be transitory in nature and such employment would also be created by a smaller and more appropriately sized development which is respectful of its surroundings. The number of permanent jobs created by the operational phase of development is minimal - it is worth noting that the application form for the proposed development has the answer “no” to question 32: “Are there any existing employees on the site or will the proposed development increase or decrease the number of employees?”.

The proximity to the borough boundary and, eventually, shopping and other facilities, will mean that any supposed “trickledown” will be lost from Lambeth to Southwark, even if, unlikely as it will be, everyone works from home in the blocks. The only economic benefit to the borough will be additional council tax receipts. This is not a reason to downgrade existing residents’ quality of life.

### ***4. Improvements to the immediate surroundings and setting of The Master’s House***

The claim of enhancement of the Master’s House (home of The Cinema Museum) is not borne out by the quality of the architecture which will be within the setting of this listed building. The Master’s House will be marred by a hard and unrelenting wall of red brick that has no reference in the Master’s House. It is also difficult to understand how the pastiche of Spanish colonial style architecture that is used in the Block A tower block can be said to enhance the setting of the Master’s House.

The materials of the peripheral blocks will present a hard and unrelenting wall of bright red brick, and metal cladding that has no reference in the Master’s House or other heritage buildings. The design of the lower peripheral blocks is poor and reminiscent of council or office blocks from the 1980s.

The setting of the Water Tower has not been referenced by the applicant here. It is not clear how the developer and its consultants are able to justify that the 14 storey tall tower in close proximity to, and in the immediate setting of the principle views of 7 storey grade II listed Water Tower building. It is telling that the developer did not provide any visualisations of the view of the Water Tower from Dante Road with the proposed tower completed. It is also telling that the planning application documents do not show visuals indicating the full extent of the effect of the tower on the Master’s House.

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### ***5. Environmental improvements to the site***

Removal of existing trees, significant additional traffic related to deliveries and servicing, overshadowing of substantial areas for significant parts of every day cannot be in any way considered as environmental improvements.

### ***6. Increasing permeability around The Master's House and the Water Tower Development***

There will be an additional route from Dugard Way to Dante Road, but it will be shared with refuse and delivery vehicles, in amongst an overwhelming expanse of planting and benches that will provide opportunities for loitering and the hiding of negative behaviour. The attractiveness of this 'new' route is questionable, particularly at night.

The pedestrian link between the tower environs and Dugard Way will be in front of Master's House, on a 'shared space', shared with delivery and service vehicles and vehicles turning (the application documents predict 20 vehicle trips a day visiting the site, but going from the experience of "Uncle" more likely to be 100 or more per day). The pedestrian and cycle connections provided will simply replicate those already available through the Water Tower development and will not improve on these which already consist of a segregated pedestrian only route.

The route through the development is appears to feature planting along the road route which will quickly become either a mess of mud and dust or will be removed completely. The paved area being shared with heavy vehicles using it regularly is likely to lead to damage to the paving. The route is also set amongst an overwhelming expanse of planting and benches that will provide opportunities for loitering and the hiding of negative behaviour. The attractiveness of this 'new' route is questionable.

There are existing safe, permeable routes for pedestrians through the Water Tower development. If anything, the proposal, with the predicted 20 vehicle trips a day visiting the site (but going from the experience of "Uncle" more likely to be 100 or more per day), will make existing walking routes less safe by introducing more vehicle pedestrian conflicts, particularly with additional large vehicles during construction and once completed vehicles both delivering and existing through the narrow roads and gateway along Dugard Way.

### ***7. Car free credentials of the development***

The development may be 'car free' but it will not be vehicle free. There is rightly the mandatory amount of parking for vehicles adapted for residents who have accessibility requirements. However, for the substantial number of delivery and servicing vehicles there is only one parking bay which will lead to congested parking on and off site particularly with taxi vehicles coming to collect or drop off residents.

***8.Retention of the Cinema Museum***

The retention of the Cinema Museum is listed as having moderate weight in paragraph 11.5 of the Planning Statement Addendum (March 2023); however, the Planning inspector did not consider this matter as a planning benefit for consideration as part of the planning balance exercise for any decision maker. The uncertainty about the status of the Cinema Museum has been entirely Lifestory Group/Anthology's doing since the site was purchased. In the period during which the previous planning application for a taller tower on site was being determined, Anthology stated in a letter that, if there was a planning appeal then Anthology would need to use money previously allocated to the Cinema Museum on that appeal. As it currently stands the Cinema Museum has been granted a 4 year lease with the option to buy the building at £1 million (confirmed on the Cinema Museum website <http://www.cinemamuseum.org.uk/>). It would appear therefore that the retention of the Cinema Museum is no longer relevant as a reason for granting this application. It would also follow therefore that the retention of the Cinema Museum should no longer form part of the description of the application, and that the site area should exclude the Master's House in which the Cinema Museum is housed.

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### **The key issues not addressed.**

Although there were some changes in the autumn of 2022 to reduce the negative features of the density and design of the proposals the actual outcomes of those changes made have been minimal as they do not tackle the fundamental issue that the density of the proposals far exceeds what this constrained site can suitably accommodate. The overwhelming majority of the community is in favour of redevelopment of the site but with adherence and respect to the constraints of the site in this urban location.

The key fundamental issues which the developer has not addressed and remain are:

#### **1) Inappropriate design, layout and density adversely affecting residential amenity**

- Height and bulk of proposed buildings would overshadow existing homes, blocking daylight and sunlight in breach of BRE guidance.
- Noise and privacy issues from windows, balconies and terraces close to and overlooking existing residents.
- Poor quality amenity and play space with limited sunlight, squeezed in around buildings and busy routes through the site.
- Delivery and servicing access and parking inadequate for size of development

#### **2) Detrimental impact on heritage assets and conservation areas**

- Large bulky buildings between 3 and 14 storeys would have a detrimental impact on Brook Drive, Renfrew Road, Elliot's Row, Walcot Square, St. Mary's Gardens and West Square Conservation Areas
- Detrimental impact on setting of heritage assets: the Grade II Listed Water Tower and Cinema Museum building would be negatively impacted next to a 14-storey tower.

#### **3) Impact on surrounding Kennington area**

- Tall and bulky design does not respond to character of low-rise surrounding area which is outside of the Elephant and Castle tall buildings cluster.
- Sets precedent for more tall buildings across Kennington.

**4) The current planning application does not address all of the six issues that the Planning Inspector raised with the previous proposal at the site and are a material consideration for this planning application**