

Stop the Blocks Community Action Group Community Feedback Report
On Initial Redevelopment Proposals Kennington Stage/Former Woodlands Nursing Home Site-Dugard Way, Kennington, London



September 2021

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Executive Summary

1. Following the release of initial design proposals for the redevelopment of the former Woodlands nursing home site by the developer on 29 June 2021 feedback was invited and collected from the Stop the Blocks Community Action Group (StB) community network and from the public.
2. Following review of the proposals, feedback from the public which has been submitted evidence overwhelming rejection of the initial design proposals as they fail to address the six issues of the original proposals scheme which was rejected on appeal for planning permission by the Planning Inspectorate on 7 January 2021. The content of the Planning Inspector's report is a material consideration for any proposed development of the site. The feedback on the current proposals also reflects a consensus of views that these proposals are considered to be detrimental in terms of societal and community harms and the negative aspects and outcomes from the initial proposals outweigh potential benefits.

Introduction

3. Stop the Blocks Community Action Group (StB) was a voluntary group formed in October 2018 to act as an umbrella group for concerned local residents, groups and associations to constructively act, respond and assist those who were concerned about redevelopment proposals at the site of the former Woodlands nursing home site in Dugard Way in Kennington, London.
4. Those volunteers organising and co-ordinating activities on behalf of the StB reflect the desire of its network of supporters who want the area to continue to grow and thrive and it has always sought a proportionate and sustainable development for all Londoners. StB is not anti-development or oppose all and any development for the site or in other areas. However, its primary remit is primarily focus on the development proposals for the Woodlands site, its alignment with the development plan and its societal and community impacts and benefits.

5. The main parties beyond the interested parties and stakeholders in the community in relation to the redevelopment of the site are:
 - a. Lifestory Group (the developer and owner of the former Woodlands nursing home site),
 - b. Lambeth Planning (the local planning authority) and
 - c. Elected representatives (including Lambeth Princes Ward councillors and Members of Parliament).
6. On 7 January 2021, the original redevelopment scheme put forward by Lifestory Group to construct 258 units on the 0.51ha development area of the site was rejected by the Planning Inspectorate.
7. In June 2021 a discussion with the developer and other parties led StB to seek to openly and constructively collaborate with the developer, Lambeth Planning and elected representatives to provide an opportunity and a platform for dialogue and discussions on the revised initial design proposals for the site. The developer expressed a desire to rebuild trust with the community following the widespread rejection by the local community of its original redevelopment proposals.
8. This feedback report has been prepared by StB as part of an effort to engage openly and collaboratively with all parties to bring about a proportionate and sustainable development of the site for all in the community.
9. StB's aim during this phase has been to enhance the pre-application process at the pre-application stage and hopefully avoid lengthy delays and frustration experienced by the community in having to repeatedly flag concerns and issues which were visible and evident to many with the original refused scheme. StB hopes that by identifying, discussing, and processing the issues at the pre-application stage this will alleviate many of the delays in redeveloping the site, reach a planning solution that minimises and carefully balances out all impacts, disbenefits and harms and to ultimately reach sound planning decisions.

The Feedback Process

10. As part of the collaboration StB opened and maintained an online feedback collection process which was to open to all in the community and aimed to collect, sort and analyse the feedback so that it may have input and interface into the pre-application process and assist the evolution of the early and initial design proposals. StB does recognise that there are people in the community who may not have online access to information and as such StB did attempt to reach out more broadly to residents in the community through supporting those individuals and limited distribution print mailing and posters.

11. Those in StB and in the network have participated in the process in good faith.

Paragraph 39 of the National Planning Policy Framework-July 2021 (NPPF) states:

“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community”.

12. Paragraph 41 of the NPPF also states “the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits”.

13. StB recognises and fully respects that those in the network and the volunteers steering the group are not the only voices that should be considered or should have the only say at the pre-application stage. However, there were three underlying factors which underpinned efforts, discussions and this pre-application stage:

- a. The developer expressed a desire and commitment to rebuild trust and ensure better communications with the community,
- b. The community were invited to participate in giving feedback on the initial design proposals in the form putting forward a limited number of local representatives to review and give feedback on the initial design proposals at an online meeting on 14 July 2021 with the developer organised by Lambeth Planning and chaired by Councillor Jon Davies (Lambeth/Princes Ward).
- c. StB has sought to assist the main parties to act as an effective liaison channel between them and the community with the aim of reaching sound planning decisions.

14. It should be noted that the hesitancy regarding the risks of COVID and meeting in person has shaped much of the shift of the formats of meetings, discussions and the collection of feedback and necessitated to it being primarily online.
15. It is also worth noting that it was clear that the community's input at the online 14 July 2021 meeting was sought at a much later stage of the pre-application process than many in the community desired and this was contrary to the expectation of real collaboration and tangible outcomes that it was anticipated that having an input at the pre-application community meeting stage could bring about. A detailed design brief had been formulated and agreed between the developer and Lambeth Planning; and there had been two pre-application stage meetings between those parties already over a period of several months. StB recognises that there are practicalities and there is no legal requirement for earlier discussions or agreement. There may also be a constrained resource issue.
16. However, the risk posed from the above situation is that some of the community will feel alienated and disengaged from any engagement process, giving feedback or participating in discussions as the scheme presented are perceived as not being options or work-in-progress but very close to or will be the unchanged form of the planning application that will submitted for permission. This in turn risks making the engagement and feedback process being perceived as tokenistic and an inflexible routine of comments from the community and stakeholders being met with preformulated closed responses.
17. StB worked with the developer and other parties and has acted as the main route in the sharing of information, assistance in responding to specific questions, circulating presentations, and supporting information, enabling, and supporting online meetings, recruitment of local representatives where possible and liaison with local resident's associations.

18. Key activities and milestones in this process included:

Date	Milestone
29 June 2021	StB circulates information and details contained in a resident's presentation of initial design proposals to its community network, posts information online and explains the details on its website (https://stoptheblocks.org/) and shares details through social media and community messaging groups. StB also invited local residents to attend, participate and act as a local representative for their street, road or estate and participate in an online community meeting to be held on 14 July 2021.
5 July 2021	StB assists the developer's team in reviewing the resident's presentation to flag any matters which may require better communication or clarification in forthcoming community meeting.
14 July 2021	Online community meeting takes place hosted by Lambeth Planning and chaired local Prince's Ward Councillor Jon Davies and also attended by his fellow ward councillors (Councillor Joanne Simpson and Councillor David Amos) and the developer's team.
3 August 2021	In light of the feedback at the community involvement meeting the developer issues an updated version of the presentation (Updated Rev C/3 August 2021) to include more planning information, details of the vision of the project, high level and visual information on daylight and sunlight impacts.
17 August 2021	StB has online follow up discussions to review the updated presentation with local professionals involved in the planning field, local residents and their representatives.
19 August 2021	The developer, Lambeth Planning and elected representatives all informed that StB's own internal target date of wrapping up its feedback exercise would need to be extended by two weeks from 31 August 2021 to 14 September 2021. The time extension was required due to scarcity of availability of many individuals and local stakeholders to assist and support them with information requirements and secure feedback, all of which primarily reflected the impact of the summer/August hiatus prior to schools restarting and residents returning from annual leave in September.
27 August 2021	StB distributes unenveloped letter highlighting the proposals and online feedback collection initiative to 150 homes in the Kennington Place, Walcot and Hayles Street areas.
8 September 2021	The developer launches its online public consultation of its preferred proposals.
14 September 2021	StB's feedback collection activities cease.

The Feedback

19. The feedback and those who have contributed their insights to StB can be categorised as follows:

- a) Key planning and development insights from those who have expertise in the field of architecture, planning and design.
- b) Feedback and insights collected from local resident's associations, individuals, residents, and households in the StB network. Overall, seventy-two individuals completed StB's online feedback form to express their views by the date of this report being completed.
- c) Feedback from individual residents with specific concerns regarding these initial design proposals and how it may impact their living conditions in their own residences.

With the exception of a few individuals, feedback from members of the public has been anonymised to safeguard individuals' privacy and any identifying or personal information has been redacted. The appendix to the Residents Feedback report has been provided as a separate accompanying document in that format and only for the view, use and consideration of Lifestory Group, Lambeth Planning and elected representatives for planning evaluation purposes only.

Key planning and development insights

Assessment of New Proposals at Woodlands Nursing Home Site Against the Reasons for Refusal of the Appeal Proposals

19. On 7 January 2021, the Planning Inspectorate dismissed an appeal (Appeal No: APP/N5660/W/20/3248960) (the appeal decision) relating to development proposals for the Woodlands Nursing Home site (the site) in the London Borough of Lambeth. The planning appeal was for a 29-storey tower and peripheral blocks to provide 258 residential units (the appeal scheme).
20. The applicant is proposing an amended scheme at the site. Peripheral blocks of 2, 3 and 5 storey buildings are proposed along with central buildings of 16, 10 and 5 storeys. A total of 170 residential units are provided. This is the 'new proposal'.
21. Since the Inspector's decision, the London Plan 2021 has been adopted. The Inspector examining the Revised Lambeth Local Plan as part of the Lambeth Local Plan review has found it to be sound subject to recommended main modifications, which were previously consulted on. The Revised Lambeth Local Plan is to be adopted very soon. Significant weight should be given to this.
22. The appeal decision provides a detailed analysis and assessment of the Woodlands Nursing Home site. The Inspector considered the appeal scheme against six key planning and site-specific matters. This assessment has considered the new proposal against the six issues the Inspector considered the appeal scheme.
23. The six issues the appeal scheme was considered in detail by the Inspector are:
 - a) The density and design of the proposed development and its effect on the character of the area
 - b) The effect of the proposed development on the settings of heritage assets
 - c) Whether the proposed development would have an appropriate mix of housing units
 - d) The effect of the proposed development on the amenities of residents of neighbouring properties
 - e) Whether the residents of the proposed housing units would have acceptable living conditions

- f) Whether the proposed development would provide acceptable amenity space and outdoor play space.

The extent to which new proposals address these issues is a key indicator of the acceptability of the new proposals at the site in planning terms. It will also demonstrate to what extent the applicant has tried to address the reasons the appeal scheme was refused in its new proposals.

Assessment of the New Proposals

24. An assessment of the new proposals against the six issues the appeal scheme was considered is undertaken below. To complete this assessment, the applicant's residents presentation document (Updated Rev C, 3 August 2021) has been used (the 'Residents Presentation'). Each issue is taken in turn and the new proposals are considered against that issue.

Issue 1: The density and design of the proposed development and its effect on the character of the area

25. In the appeal decision, the Inspector had the '*inescapable conclusion*' that the site is '*urban in form and character*'. The immediate surroundings of the site are '*two and three storey housing to the east, north and west*'. The Inspector concluded that the 29 storey tower would have a '*substantial adverse effect on the character of the area*'.

26. The new proposal includes a 16 storey and 10 storey building surrounded by buildings ranging in 3-5 storeys. In its Residents Presentation, the applicant considers the lowered height '*reduces the impact on the local character*'. Whilst lower height could reduce the impact on the character of the area, a 16 storey and 10 storey building in an area characterised by '*two and three storey housing*' would have an adverse effect. Therefore, it is considered that the new proposal does not adequately address this reason for refusal. The new proposal is too tall and would still cause adverse effects on the character of the area.

27. Due to its height, layout and massing, the new proposals do not accord with London Plan Policy D3 which requires development to be design-led and to positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing building types, forms and proportions. The Revised Lambeth Local Plan Policy Q7 requires new development to adequately preserve or enhance the prevailing

local character through its bulk, scale/mass, siting, building line and orientation. The new proposals do not preserve or enhance the prevailing character which is characterised by two and three storey housing and does not accord with Policy Q7.

28. Therefore, a further reduction in height of the tallest buildings is required to assimilate with the surrounding character of the area and to make the new proposals acceptable in policy terms.

Issue 2: *The effect of the proposed development on the settings of heritage assets*

29. The Inspector concluded that the appeal scheme would '*undermine and harm the significance*' of '*the Water Tower... The Master's House... the RRCA [Renfrew Road Conservation Area]... the WeSCA [West Square Conservation Area]... ERCA [Elliott's Row Conservation Area]... the Former Lambeth Magistrate's Court and the WaSCA [Walcot Square Conservation Area]*'. Importantly, the Inspector concluded that the harm caused by the appeal scheme '*would cause less than substantial harm of high magnitude to the setting of the Grade II Listed Water Tower*'.

30. The new proposal includes a 16-storey tower that is located closer to the Water Tower than the appeal scheme. Whilst the new proposal is not as tall, it is still twice the height of the Water Tower and physically closer to the Water Tower. A heritage assessment of the new proposal has not been made available to date. However, on the basis of the appeal scheme causing '*less than substantial harm of a high magnitude*' it is considered the new proposal would likely cause the same harm to the Water Tower. Therefore, the new proposal would cause the same or possibly greater heritage harm to the Water Tower as a Grade II listed heritage asset.

31. In its Residents Presentation, the applicant claims that a '*lowered height reduces the impact on the wider heritage assets*'. The emphasis should be placed on '*wider heritage assets*', as the heritage assets in close proximity to the new proposal – the Water Tower and The Master's House – are likely to experience the same or greater negative impacts due to the siting and proximity of the proposed built form, its scale, height and massing.

32. Further heritage assessments are required to understand the negative impact of the new proposal on heritage assets. However, a review of the new proposals assessed against the Inspector's reason for refusing the previous proposal, identifies that there is likely to be a maintained and potentially worse harm to the closest and most sensitive heritage

assets at the site. Therefore, the new proposal is not considered acceptable in heritage terms and does not address the heritage reason for refusal of the refused appeal scheme. The new proposal would conflict with Revised Lambeth Local Plan Policy Q20 and London Plan Policy HC1 as it would be harm to the significance/setting of a listed building.

Issue 3: Whether the proposed development would have an appropriate mix of housing units

33. The Inspector considered that the previous scheme's dwelling size and mix, and in particular the mix of affordable units, was not in accordance with policy requirements in the London Plan. The Inspector stated that the previous scheme's '*proposed housing mix would not, in itself be a mixed and balanced community*' and it would conflict with the previous London Plan and Lambeth Local Plan policies. However, the Inspector was pragmatic in his approach and it was understood by all parties that '*only minor weight*' was attributed to the conflict of housing mix with relevant policies.
34. The applicant suggests that the new proposal has an improved housing mix responding better to policy requirements. It is acknowledged that housing mix and viability are often intrinsically linked. The proposal of affordable housing in the new proposal is welcomed. The final housing mix and tenure mix is one that will likely be balanced between viability and deliverability.
35. The positive benefits of the provision of affordable homes within the new proposals, or any scheme to come forward at the site, and the viability of delivering such affordable units, should not be at the expense of or override other planning considerations of what makes a scheme at the constrained former nursing homes site acceptable. The weight attributed to affordable housing should not tip the balance in favour of a scheme that has negative impacts on heritage, residential amenity, density, design or other material considerations.
36. Designing the optimum scheme that addresses the site's constraints and opportunities and respects the existing surrounding character should be the main consideration and aim of any scheme to come forward at the site. The viability of that optimum scheme and the amount of affordable housing it can provide should only then be considered once the optimum scheme has been agreed.
37. The NPPF, London Plan and Revised Lambeth Local Plan all support the delivery of new housing, including market housing, as this helps address the UK's and London's housing

need. The provision of a higher number of market and affordable housing should not tip the balance to offer support for a scheme that has negative impacts on a range of other planning matters.

38. Therefore, it is suggested that housing mix is considered at an appropriate time once the optimum design has been agreed based on the specifications and market demand at that point in time and not before. Otherwise, the provision of affordable housing has the potential to adversely influence the optimal design and density of a suitable scheme at the site.

Issue 4: *The effect of the proposed development on the amenities of residents of neighbouring properties.*

39. In his report, the Inspector identified that appeal scheme would cause '*residents of several properties adjoining the site [to] experience a significant, and in one case severe, reduction in daylight in their most important rooms... and several properties would experience a significant reduction in sunlight in their gardens*'. The Inspector also found that the appeal scheme would '*result in overlooking and perceived overlooking of garden and amenity spaces*'. The appeal scheme would also '*dominate many private areas*' and be '*visually intrusive in the outlook of some residential properties*'. Due to this, the Inspector concluded that the appeal scheme '*would have a significant and unacceptable effect on the amenity of residents of dwellings around the site*' conflicting with the previous London Plan and Lambeth Local Plan.

40. The applicant suggests that the new proposals would, due to their '*lowered height*', have a '*reduce[d] impact on shading and daylight impacts, and buildings close to the site boundary have no living rooms or balconies which overlook neighbours*'.

41. The Building Research Establishment (BRE) Guide recommends that to assess the effect of development on daylight using the Vertical Sky Component (VSC) and No-Sky Line (NSL) tests should be used. The BRE Guide advises that if a proposed development would reduce VSC to below 27% and if the reduction is more than 20% its value before new development, then occupants would likely notice the reduction on daylight. In his report, the Inspector set out that a lower VSC level at this location is a suitable benchmark. The Inspector concluded that a '*VSC benchmark of 16% is appropriate for bedrooms but a VSC of 18% must be applied to living rooms and combined living/kitchen/dining rooms*'. The Inspector also stated '*it is necessary to consider the percentage reduction in daylight*

distribution in a room, the NSL test, in an assessment of the degree to which there would be harm to residential amenity'.

42. In its Residents Presentation document, the applicant has set out its results of a daylight/sunlight assessment on existing dwellings surrounding the new proposals. The applicant has assessed VSC, NSL and Average Probable Sunlight Hours (APSH) by reference to guidance set out by the BRE Guide. The applicant has also considered the levels of compliance which '*take into account the recommended alternative VSC target values set out by the Planning Inspectorate as appropriate for this location*' which is a VSC of 16% for bedrooms and 18% for living rooms and combined living/kitchen/dining rooms.
43. In its Residents Presentation, the applicant has presented the results of its assessment and sets out a combined figure of the number of existing windows that meet the BRE or the alternative lower VSC target of 16% and 18%, along with NSL and APSH compliance. The applicant does not distinguish between those which meet the BRE Guide levels and the 'alternative' lower VSC level. Despite using a lower alternative benchmark, the new scheme will have an impact on daylight/sunlight resulting in a situation where not all existing dwellings surrounding the site would meet even the lower 'alternative' targets in terms of maintaining acceptable levels of daylight/sunlight.
44. In terms of VSC, only 94% of existing windows will meet the BRE Guide or the lower 'alternative' VSC level. This means 6%, or 51 windows, will be impacted more severely by the new proposal in terms of VSC even when the lower VSC level of 16% and 18% is applied. The new proposal would also impact existing dwellings when assessed against NSL and APSH with not all existing dwellings meeting the required benchmark. This assessment undertaken by the applicant demonstrates that for this reason alone, the new proposal would cause an unacceptable amenity impact on existing residential properties in terms of daylight/sunlight.
45. Another reason the Inspector considered the appeal scheme was not acceptable due to its adverse impact on residential amenity was because of overlooking and perceived overlooking of garden and amenity spaces. It is considered that these issues are not adequately addressed by the new proposal. The layout and location of the development blocks has introduced buildings closer to existing residential buildings that surround the site. The applicant sets out in its Residents Presentation that '*buildings close to the site boundary have no living rooms or balconies which overlook neighbours*'. Despite this, the buildings remain close to existing buildings, windows are proposed on all elevations and the perceived effect would be a sense of overlooking as well as that of overbearingness

as new buildings will be introduced that are taller than their adjacent existing buildings. Further, the new proposal has 16-storey and 10-storey blocks located centrally in the site close to the central southern boundary and closer to the Water Tower building than the appeal scheme did. This, combined with the effect of the outer mansion blocks, increases the effect of overbearingness and impacts the amenity of existing dwellings surrounding all edges of the site.

46. The new proposal would have an adverse impact on daylight/sunlight, perceived and actual overlooking and overbearingness. The new proposal does not address the Inspector's reason for refusal based on the effect the development has on the amenities of residents of neighbouring properties. It will not protect or provide sufficient daylight and sunlight to surrounding housing appropriate for its context, even when assessed against the 'alternative' target, meaning the new proposal does not accord with London Plan Policy D6 part D. The new proposals do not meet the requirements of London Plan Policy D9 part 3(a) which specifically requires tall building proposals to address environmental impacts, including daylight and sunlight impacts of the proposal to ensure the comfort and enjoyment of open spaces are not compromised. The new proposals also conflict with Revised Lambeth Local Plan Policy Q2 which requires development to not have an unacceptable impact on levels of daylight and sunlight on adjoining properties.
47. Therefore, the new proposal is not considered acceptable in terms of its impact on existing residential amenity of residents of dwellings around the site.

Issue 5: Whether the residents of the proposed housing units would have acceptable living conditions

48. The previous scheme was considered by the Inspector to not provide all residents of the proposed buildings with an acceptable level of amenity. The appeal scheme would not have delivered all units with adequate daylight and some units were overlooked. This led the Inspector to conclude that the appeal scheme would have provided some sub-standard dwellings which would not be acceptable in planning terms and would conflict with local planning policy.
49. The applicant sets out that the new proposal has sought to address these previous amenity issues. In its Residents Presentation document, the applicant sets out that the '*DL/SL [daylight/sunlight] of the proposed dwellings are improved by decreasing the height of the proposals*'. It is not apparent how reducing the height of the proposal improves the daylight/sunlight of residents who will inhabit those buildings. There is not enough detail

available to assess the new proposal. Therefore, until a comprehensive assessment has been undertaken, it has not been demonstrated that the new proposals have adequately addressed this reason of refusing the appeal scheme.

Issue 6: Whether the proposed development would provide acceptable amenity space and outdoor play space

50. The Planning Inspector considered the appeal scheme to be acceptable in terms of amenity and outdoor play space. However, this was a point that was specifically considered for the appeal scheme and so should be considered for the new proposals. The Revised Lambeth Local Plan Policy H5 requires new flatted development to provide the following quantities of amenity space: 10m² per flat either as a balcony/terrace/private garden or consolidated with communal amenity space; and for development of 10 or more residential units a further 50m² per scheme of communal amenity space.
51. The new proposal includes amenity space provided through private balconies to some of the residential units and outdoor communal spaces arranged around the proposed buildings. Balcony sizes should meet minimum requirements and where 10m² of private amenity space per flat is not provided, the remaining requirement of amenity space is to be consolidated into communal amenity space. The level of amenity space proposed in the new proposals should be checked to ensure conformity with policy requirements.
52. The design and layout of the new proposals, with proposed buildings in close proximity of each other, and to neighbouring buildings, will in effect limit natural light to balcony spaces and overlooking of balcony spaces will limit privacy. The design of private balconies within the development will need to be considered further to ensure private amenity space of sufficient quality is provided.
53. The provision of outdoor communal amenity and play space around the main access route through the development and at ground level, between closely positioned buildings of 3 to 16 storeys, presents questions over the quality of this space. The close positioning of buildings will limit natural light to these spaces. It is considered that the physical layout of these spaces, in the margins of the main access route through the development, will undermine the quality of the communal amenity spaces for residents in the new proposals. Therefore, it is considered that the new proposals do not provide acceptable quality amenity space and outdoor play space.

Conclusion

54. An assessment of the applicant's new proposals for a scheme of 170 residential units at the Woodlands Nursing Home site against the six main issues the appeal scheme was considered has been completed. The applicant's Residents Presentation has been used to complete the assessment.
55. It is considered that the new proposals do not address the reasons the appeal scheme was refused planning permission. The new proposals are considered to be contrary to policies in the new Revised Lambeth Local Plan which holds significant weight and the London Plan. The new proposals are not acceptable in terms of its design, height and density and would have an adverse effect on the character of the area contrary to London Plan Policy D3 and Revised Lambeth Local Plan Policy Q7. The new proposals would have an adverse effect on heritage assets, in particular the Water Tower, conflicting with Revised Lambeth Local Plan Policy Q20 and London Plan Policy HC1. The adverse impact the new proposal would have on existing residential amenity, especially in terms of daylight and sunlight on surrounding residential properties. Existing residents will experience unacceptable impacts in terms of daylight/sunlight as demonstrated through the applicant's own assessment and would not accord with Revised Lambeth Local Plan Policy Q2. The new proposal includes buildings located closer to existing residential buildings causing actual or perceived negative effects on privacy and overlooking. The new buildings will lead to overbearingness. It is also considered that the new proposals would not provide new residents with acceptable quality amenity space or outdoor play spaces.
56. For these reasons and detailed in the assessment set out above, it is considered that the new proposal does not adequately address the reasons the appeal scheme was refused planning permission. Further, the new proposal conflicts with policies in the Revised Lambeth Local Plan and the London Plan. The new proposal requires amendments to its layout, height, density, amenity and design to address the reasons it is considered unacceptable.

Additional Notes from other professionals

57. The Planning Inspector's report is a material consideration and useful analysis of any new proposal. It is also important not to ignore other matters. For example, new Lambeth Local Plan Policy EN5 and Annex 5 require the appellant to submit a sequential and exceptions test for more vulnerable uses such as new housing¹. The new London Plan (Policy SI 12) requires a similar sequential approach to building new housing.
58. The proposal is still within flood zone 3 according to the Government's Flood map for planning. According to the appeal decision on the previous scheme (Appeal Ref: APP/N5660/W/20/3248960), paragraph 83 an
"agreed condition would require the prior approval and implementation of a Flood Evacuation Plan, which would include details of, amongst other things, advanced flood warning measures, advanced site preparation and evacuation measures, and dedicated named flood wardens who would be on site at operational times. Though the flats at ground floor level of Block A would be susceptible to flooding, with an approved Flood Evacuation Plan in place and on-site wardens in attendance residents of these flats would not be in danger. The Environment Agency, furthermore, in a letter to The Planning Inspectorate dated 19 October 2020 and in response to the submission of a Flood Risk Assessment, stated that "We do not oppose the planning application as submitted, subject to the attached conditions being imposed....".
59. It is not clear whether this proposal, with fewer units, would also have full time site wardens, but, if so, the annual cost of that full time staff per unit will be significantly higher and less economic, especially for those in the "affordable housing" units that are directly affected by this issue.

¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6000/2115548.pdf

The Architecture

StB requested and Professor Andrew John Saint kindly provided an analysis of the architectural merits of the scheme which is detailed below.

Notes by Professor Andrew John Saint on Revised Application for Woodlands site, August 2021

I have carefully studied the revised application for this site, with particular attention to the architectural aspects of the scheme. From the documentation this far provided, my view is that though the new scheme certainly improves on the appeal scheme, it still falls far short of the standards of design which ought to be in evidence for this important site within a conservation area and adjacent to listed buildings.

The root of the problem, as many people pointed out at the consultation meeting on July 14th, is that the developers are still trying to get too many housing units on to a tight site. Although 170 units are better than 258, and 16 storeys for the tall building are better than 29, that does not make the revised design good or acceptable. The applicants have not really taken on board what the inspector said was the reasonable size of development for the site, and that must be their Achilles heel.

There is, for instance, little or no change in the continued proximity of the side blocks to the backs of Renfrew Road and Castlebrook Close, which was one of the issues raised at the July meeting. Little detail is provided in the 'sympathetic architecture' section of the application about these low blocks apart from some inward-facing views which suggest they are intended to be orthodox-looking brick-faced flats. But the backs facing Renfrew Road and Castlebrook Close/Brook Drive do not promise to be at all satisfactory, to judge from the diagrams in the 'Building Heights Along the Boundary' section of the presentation. These are shown as cut back and given Velux roof lights, suggesting an ugly and unacceptable profile and also bedrooms inside without views out.

I note that the 'Options Tested' by the architects in the new application all depend on a rigid rectilinearity which seems to stem from the brief to get as much on the site as the developers believe to be feasible. On this enclosed site, if a lower density of development were to be explored, good architects might well explore turning or twisting the blocks to some degree. I do not believe there is anything in the context which should present such an option from being creatively explored, so long as the heights are kept down to levels similar to those on the Bellway development.

The focus in the 'Sympathetic Architecture' section is naturally on the high building. This appears to be sixteen storeys now – though the applicants say they also explored 12 and 15 storeys. Though the design is a definite improvement on the appeal scheme, that is no great compliment. As before, there is a reaching for a token contextual gesture. This time they have picked up the brick colours of the Master's House for some of the cladding of the tall block, reasonably in my view.

They have then gone further by adding in arches from the same source in order to add some interest to the top and relieve the banality of the tower design. As these arches have no structural reality or mouldings of the kind found on the Master's House, they have an unfortunate pastiche or add-on look. That is compounded at the corners, where the arches are combined with recessed balconies. In architecture the usual view is that arches need to be (or at least to look to be) solidly supported, especially at the corners, where two arches abut in different planes, but in this design the corner piers seem to be no thicker than the others, which gives an appearance of weakness. The effect of the recessed balconies is to make these corners appear even weaker. These arbitrary arches also

reappear at one corner of the base of the building, two in one direction and three in the other, so as to draw attention to the corner entrance which appears to have a surprisingly generous staircase visible behind glass. It would have been more logical if the arches were taken right round the base rather than confined to a single corner. But in fact all the arches, top and bottom, are just a decorative gesture, introduced to compensate for the underlying monotony of the design.

It remains the case that for social and architectural reasons alike, this site is not suitable for a tall building of any kind, as was several times emphasized at the appeal enquiry.

AJS, 17 Aug 2021

Sustainability and Design

StB requested and Ann Bodkin RIBA, ARB kindly provided an analysis of the design and sustainability merits of the scheme which is detailed below.

Comments by Ann Bodkin, September 2021

Lambeth Council became the first London Council to declare a climate emergency in January 2019. The new London Plan 2021 includes many changes and ambitious policies to support current and future generations.

The developers at Woodlands site, have the opportunity to respond with the highest quality standards, however, as demonstrated in the Resident's Presentation Updated Rev C 3 August 2021, the proposal not only fails to respond to the new ambitious policies, but the overbearing scale of this development remains as not appropriate for the small constrained site in an urban low-rise area.

The proposals need to be a lower density development that would protect the significance of the listed buildings, Conservation Areas and respect the prevailing building heights, density and massing of the surrounding residential properties.

The proposal would have detrimental living conditions of the intended residents, by failing to address the highest quality of fire safety, thermal comfort (due to the impacts of overheating because of climate change), along with green infrastructure for wellbeing.

In response to the document, Resident's Presentation Updated Rev C 3 August 2021, the proposed development is unacceptable due to:

- The site design brief fails to identify the density should be appropriate for the site (*LP 2021 Policy D3: The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context*)
- the site area of development has not changed from previous schemes, as such the density has not been addressed satisfactorily, and remains inappropriate for the site. This issue was the main reason of the appeal proposal dismissed by The Planning Inspectorate on 7th January 2021
- the site is a back lands site surrounded on all sides, predominately by 2/3/4/5 storey residential units
- The new designers with this design-led approach, have not addressed the development to suit the capacity of the site. The proposed layout, bulk, height, massing and scale is inappropriate for the site itself
- the site is not suitable for a tall building. Inadequate urban design analysis is provided with inappropriate reasoning 'lowered height reduces the impact' which does not address the over-development of the site. (*LP 2021 Policy D9: Tall Buildings*)
- is out of keeping in its context and townscape which is symptomatic of over-development.
- a substantial adverse effect on the character of the area as fails to make a positive contribution to the local and historic context including listed building and conservation

area.

- The design of the tall building fails to demonstrate the requirement for the highest standards of fire safety, with only a single staircase core being provided is detrimental living conditions of the intended residents
(LP 2021 Policy D12: Fire Safety The provision of stair cores which are suitably sized, provided in sufficient numbers and designed with appropriate features to allow simultaneous evacuation should also be explored at an early stage)
- The masterplan demonstrates the footprint of the proposed development takes up more of the site than the dismissed appeal scheme. The resulting combination of deep plan, lack of dual-aspect in all blocks, low floor to ceiling height, lack of natural passive ventilation would have far reaching and detrimental living conditions of the intended residents. The quality of housing also needs to address the well-understood impacts of Post-COVID 19 context.
(LP 2021 Policy D6 Housing quality and standards and Policy 5.9 Overheating and cooling)
- it would fail to address health and social inequalities by a lack of addressing resilience to the effects of the climate emergency
(LP 2021 GG6 designed to adapt to a changing climate, avoiding contributing to the urban heat island)
- the site design brief fails to identify the requirement of a net zero carbon development at an early strategic stage (in operation, whole life cycle carbon achieved with no carbon offset fund)
(LP 2021 Policy S1 2 Minimising greenhouse gas emissions)
- the overdevelopment of the buildings and subsequent poor quality of green space, and space for play fails to contribute to improving Londoners' health by creating a healthy city
(LP 2021 GG3 Creating a Healthy City)

Daylight/Sunlight assessments on the impact on surrounding residential homes and gardens (baseline for daylight benchmark levels) need further analysis presented, as they are lower than dismissed appeal scheme.

(LP 2021 GG3 Creating a Healthy City)

Qualitative Feedback

59. The feedback below is informed by the qualitative comments submitted via StB's online feedback from and emails to StB during this exercise.

Feedback from Residents Associations

60. StB reached out to discuss the initial design proposals with a number of community groups within its network and of those that we are able to reach their feedback is summarised below and full details of their statements are included in the appendices. Additionally, StB met or assisted a number of residents in the Water Tower estate, Brook Drive, Renfrew Road and Castlebrook Close. Due to extenuating circumstances, it was not possible to secure feedback from two other residents associations, however a number of residents from those associations did provide their own feedback on the initial design proposals.

Summary of Feedback from local Resident's Associations

Local Residents' Association	Summary of feedback	Appendix Reference
Cleaver Square, Cleaver Street and Bowden Street Residents' Association	Consider proposals to be unacceptable due to; impact on residents in the neighbourhood and surrounding conservation area, height of two tallest buildings and harm to heritage assets. Also concerned about the oversupply of market housing and under supply of affordable housing in the proposal.	1
Herald's Place Residents Association	Concerns about increased traffic, and unsustainable pressure on local amenities and services from increase in the population density. Believe that the harms to the existing community would far outweigh the benefits that are being claimed.	2
Kennington Place Management Company	Concerned about the impacts on residents in Kennington Place of current proposals, absence of key information and fundamental design matters which could impact those residing on the site and also those adjacent to the site and the wider community.	3
The Renfrew Road Townhouses Residents Association	Concerned about over massing on the site with a quantum which is nearly double indicated by the Planning Inspectorate and Lambeth Council. Also concerned about external impact of height, size, and proximity to existing residences of the perimeter mansion blocks with detailed analysis provided in an accompanying statement by Ms Kim Loddo.	4 and 5

West Square Residents Association (WSRA)	The proposed 16 and 10 storey towers are too high and will clash with the character of the surrounding area. Will also harm the settings of the heritage assets of the Water Tower, Masters House, other listed buildings and the conservation areas of Renfrew Road, Elliott's Row, West Square & Walcott Square.	6
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Public Feedback

61. Feedback from members of the public has been compiled into a separate appendix and the contributor's input has been anonymised to safeguard their privacy. Also, personal or identifying information has been redacted. This appendix of public feedback will be provided only to the developer, Lambeth Planning and elected representatives so that they have evidence of the comments from the public. It is also worth noting that StB did not seek to provide leading information to those who may wish to provide feedback and it did not develop a position of opposing or supporting the new proposals during the feedback collection exercise. This approach was adopted to reflect a genuine desire for StB to be objective on the matter and provide an open and unbiased forum for the public to give their own objective view of the new proposals.
62. There are several concerns raised by individuals of the new proposals and there was very sparse positive feedback. One of the key themes of the feedback has been the quantity of units proposed for the site. Many members of the public have cited paragraph 99 of the Planning Inspectors report to encapsulate their concerns about over massing on the site and that closing paragraph of the inspector's report (a material consideration for any proposed scheme) and which also references the source for its assertion is:
- Future housing provision in Lambeth is addressed in Topic Paper 10a to the DRLLP, published in October 2020. 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.
63. Many of the concerns from members of the public raised also focus on the impact of the perimeter buildings on homes adjacent to the site, the inappropriateness of two tall

buildings on the site of sixteen and ten storey blocks in an urban low-rise area, the harms to the existing heritage assets and conservation areas, and the quality of living conditions not just for existing residents but also those who will potentially reside in the proposed blocks.

64. Some of the main points of feedback from the public is summarised below. For those parties that will be receiving the appendix of public feedback, we would recommend that the comments provided are read in full.

Summary of feedback from members of the public on the proposed scheme

Matter	Key point(s) of feedback
Principle of development	There were no objections to the principle of redevelopment of the site or its use for providing residential housing.
Over massing	<p>Density of the scheme The majority of objections referenced that the quantity of housing that was being proposed was excessive (over massing) and contrary to the Planning Inspectors conclusions and the quantum stated by Lambeth Council that the site could reasonably support.</p>
Relationship with neighbours	<p>Loss of Daylight, Sunlight and Overshadowing The new proposals do not ensure that neighbouring properties meet BRE guidelines in relation to external amenity spaces and most particularly in respect of VSC and NSL.</p> <p>Height and design of perimeter buildings Unacceptable impacts on residents' privacy, overlooking, sense of enclosure, overbearingness and risks of intrusive noise and disturbance from the buildings placed closest to the boundaries on all residences adjacent to the site.</p>
Townscape and Heritage	<ul style="list-style-type: none"> • Tall tower blocks not suitable for the site which is in urban low-rise area. • The proposals cause unacceptable harm to heritage assets and conservation areas in the local and wider area. Superficial regard has been given to the significance of the setting of the listed Water Tower and the Master's House. There are superficial nods the architecture of the Masters House which placed on top of the 16-storey block and are essentially meaningless. • The massing of the proposals does not respond to the surrounding character. • A few individuals expressed preference with the 12-storey option in referenced repeatedly in the 3 August presentation, which was later removed from the developer's public consultation document issued on 8 September 2021.

Architecture	<ul style="list-style-type: none"> The buildings designs are not sympathetic with the local context which is a low-rise urban area A negative response to many of the features of the 16-storey block, in particular the arches at the top of the building.
Housing quality	Quality of amenity space for residents for genuinely healthy use by residents
Trees and Green Infrastructure	Loss of established trees
Car parking/Traffic/ Local congestion	Will put significantly more traffic in the surrounding streets, particularly Renfrew Road, Dugard Way, Dante Road, Brook Drive and Hayles Street, and possibly Elliott's Row, (a cycle superhighway).
Deliveries, servicing and refuse collection	<ul style="list-style-type: none"> The figure of 29 deliveries per day and one refuse collection per week were widely considered by many in the community to not be credible or accurate. One resident has provided their own analysis as part of the public feedback collection of the estimated deliveries for the proposed development and highlights the constraints of the site which make the proposed servicing arrangements impractical and unrealistic, raises safety concerns for pedestrians and cyclists using the public access route.

65. There was also some interest expressed in the active ground floor frontages, quality of public realm and healthy routes that encourage walking and cycling through the neighbourhood , where people feel they are respected, rather than having to walk past service routes, bin stores and gated developments.

66. During the feedback process there were questions and additional information sought which was relayed from the community through StB to the developer and most of these matters were addressed. Additionally, following feedback and requests for additional information at the 14 July 2021 online community meeting with local representatives the developer helpfully and thoughtfully sought and they provided more detailed information on the redevelopment proposals, which included details on the vision for the project, daylight, sunlight, overshadowing, building dimensions and proximities to neighbouring properties.

67. However, there were two key pieces of information which were requested by the community through StB which have not been provided by the developer and which in StB's opinion would have been helpful and useful for objective analysis at this crucial pre-application stage. Those two outstanding pieces of information requested are;

- Data on the actual projected numerical values of daylight as measured in terms of Vertical Skylight Component (VSC) impacting from the proposals on neighbouring

properties. This would have been much more helpful to gauge the severity of the deliration in VSC from the proposals which the green/yellow shading visuals that were useful but considered to be incomplete for use.

- b. A 3D visual of the site to demonstrate an overview of the layout, heights, massing, and configuration of the proposed perimeter mansion buildings and 16, 10 and 5 storey blocks. An 3D visual image of the site which was used at the 14 July 2021 online meeting was shown by the developer, but it was subsequently withdrawn and despite requests it has not been provided.

A birds eye view of Lifestory's new proposals looking north presented on the [developers website on 21 September 2021](#) is not dynamic/multi directional and so it does not assist in objectively assessing the visual impact of the proposals from the site in the immediate local area. While the original visual image may not be how someone actually on the site or nearby will experience the architecture and design of the site, it would have been useful to have this information to assist in balancing interpretation of the proposal's visual impacts within the surrounding context. It is also pertinent as there was feedback and concerns raised during discussions and the feedback process that some found the street and heritage visuals to be confusing due to the technology that was applied, difficult to decipher and confusing.

Conclusions

68. StB has collated the feedback of the new proposals from members of the public and local residents including some who have particular professional understanding and skills in the fields of planning, architecture, sustainability and design.
69. It is clear from the feedback that the majority of respondents strongly object to the current proposals and there are several themes which run through the majority of the public's feedback:
- a) They do not address the six issues that the appeal scheme was refused planning permission for and therefore it is not a policy compliant proposal.
 - b) The proposed massing is too dense, overbearing and enclosing for those adjacent or near the site and will also be for many within it. The site is in an urban low-rise area which is not suitable to insert tall buildings into, which are incongruous with the location and will have an adverse effect on the character of the area, on heritage assets and existing conservation areas.
 - c) The proposed architecture is not of a design that genuinely accords with the site and its surrounding context.
 - d) The proposal would have detrimental living conditions of the intended residents, by failing to address the highest quality of fire safety, thermal comfort (due to the impacts of overheating because of climate change), along with green infrastructure for wellbeing.
 - e) The unjustifiable impact on residents living conditions due to the poor relationship of the proposals with its neighbours in the surrounding area. Some of those impacts include, loss of privacy, amenity, significant reductions in daylight and sunlight, and increased overshadowing due the proposed designs on properties adjacent to the site
 - f) The new proposals would not provide acceptable amenity space or outdoor play spaces.
70. The design brief on page 83 of the resident's presentation (Version 3 August 2021) sets out the design and planning principles for the project. It states that the proposals should be design led, and its character will emerge from the design as it is developed. However, it is clear from the design brief that the primary objective that the design has to meet is to be able to accommodate in the region of 150 – 200 homes, if the principles that it

outlines in the design brief can be appropriately met. From the community's review of the initial designs, it is clear that the design does not meet or adhere to its own principles that it set out with, particularly in terms of its relationship with neighbours, townscape and heritage, and architecture.

71. Paragraph 132 of the NPPF states:

" Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot".

72. There has to be trust, openness, and transparency with any community involvement in applicants considering and asking for feedback on redevelopment proposals. It should be noted Lifestory stated in their consultation document issued on 8 September 2021 and on their website that they aim to submit a new planning application to Lambeth Council soon after their pre-planning consultation ends on 24 September 2021. This leaves the question and concern as to when the developer (applicant) was planning to work closely with those affected by their proposals to evolve designs that take account of the views of the community. The developer has said that they will now consider the comments and feedback collected and StB expects this to be upheld with accountability to Lambeth Planning and the elected representatives.

73. If StB were to be selective and highlight the feedback from one member of the public, it would be this:

"The developer should be held to extremely high standards of consultation, with the opportunity for the local community to input on not only the massing etc but specific elements of design, to try and improve the relationship with the community and provide a sense of ownership and inclusion towards the building once it is built."

Recommendations

Based upon the meetings held, discussions and feedback; StB proposes three recommendations to the developer, Lambeth Planning officers and elected representatives which we believe will be reciprocated with the support of the StB community and its network:

73. Genuinely and openly re-examine the design brief and seek a design option(s) of an optimum scheme that addresses the site's constraints and opportunities and respects the existing surrounding character, its relationship with neighbours, heritage assets, townscape and meets the housing needs of the community. In short, changes are needed to the new proposal to address the matters raised by the planning inspector, residents and members of the public with an optimum scheme which has a more balanced quantum, policy compliant design and relevant architecture which will address the issues raised by those who have provided feedback to StB and in many cases directly to the developer itself. As highlighted before, the viability of that optimum scheme and the amount of affordable housing it can provide should only then be considered once the optimum scheme has been agreed.
74. Examine all the issues raised in this report with the aim of ensuring the current underlying weaknesses of the new proposal are addressed, resolved, and genuinely mitigated against. It is clear that the current proposal is an integrated system; so changes in one aspect will probably impact another element of the design proposals. Therefore, in tandem with individual discussions with concerned residents, discussions and collaboration with all parties as a collective group (including the developer, Lambeth Planning, StB, stakeholders, and elected representatives) should take place to minimise displacing issues from one area to another. A minimum measure of success from these discussions would be actual tangible and beneficial changes to the new proposal which address the issues and concerns raised by the community.
75. The developer, Lambeth Council and/or councillors provide support to the community, with a transparent process, which provides adequate scrutiny of the quality of the design proposal to meet planning policy. Greater engagement in the full process could be achieved, if a full project plan is communicated and agreed with community, councillors, council officers with a complete project timeline.

Appendices

Appendix 1: Cleaver Square, Cleaver Street and Bowden Street Residents' Association

"I write as chair of the nearby community group, the Cleaver Square, Cleaver Street and Bowden Street Residents' Association. These proposals remain unacceptable and will have a detrimental impact on those living in the neighbourhood and on the surrounding conservation area. The proposed heights of the two tallest buildings are still far too tall for this predominantly low-level area. One of your stated aims is not to cause unacceptable harm to local heritage assets in the local and wider area. By continuing to propose tall towers, completely out of scale with the surrounding homes, you are doing just that. Views from local historic streets and buildings will be forever blighted. Existing residents will suffer from loss of light and overshadowing. None of the blocks should exceed 5 storeys.

Re question on market sale/affordable mix:

There are already many market sale apartments being built at the Elephant and Castle, Oval Village and Nine Elms. What is desperately needed is affordable housing. Switching to this type of housing would be an opportunity to show that developers do actually care about the local community and are willing to set aside higher profits for the benefit of those who need decent homes."

Penny Ritchie Calder
Chair, Cleaver Square, Cleaver Street and Bowden Street Residents' Association

Appendix 2: Herald's Place Residents Association

Dear Stop the Blocks,

The following are HPRA's comments on the current proposals:

We are the directors of Herald's Place Residents Association Ltd, a not-for-profit corporate trustee which owns the freehold of Herald's Place, off Renfrew Road. We manage the development on behalf of our shareholders, who are the company's lessees. We therefore represent the interests of the lessees and residents of the 40 houses and 8 flats which comprise Herald's Place.

One side of Herald's Place is on the west side of Renfrew Road, directly opposite the Woodlands site and close to the site boundary (perhaps 50 m as the crow flies). Several of our properties face onto Renfrew Road and will be directly impacted by anything built on the Woodlands site which rises above the terrace of 3-storey houses on Renfrew Road.

Our development is also affected by the amount of traffic on Renfrew Road, and this applies in equal measure to the properties already mentioned and to several other Herald's Place properties which front onto Gilbert Road. Both roads are relatively narrow, with buildings that have no set-back from the pavement. They are clearly residential in nature and unsuited to heavy traffic. As such, we are already concerned at the greatly increased number of vehicles cutting through between the A roads that surround our area since Southwark Council installed a filter on Dante Road in 2018, effectively ending the previous shortcut via Brook Drive.

More broadly, any pressure on local amenities and services will potentially have a negative impact on Herald's Place residents.

Our lessees and other residents welcome the continued development of their local area and accept the need to accommodate an increase in the population density. They are concerned to ensure that this is done in a proportionate way and in harmony with the existing built environment, as was the case with the Water Tower development and is also being achieved by Lambeth's redevelopment of Knight's Walk, the first phase of which is nearing completion and successfully blends in with adjacent building heights, mass and styles.

The development being proposed by Lifestory would substantially – and we believe negatively – change the nature of this low-rise urban residential area. As set out in Lambeth's local plan and endorsed by the Inspector who rejected Lifestory's appeal over its previous proposal, the Woodlands site is suited to a maximum of 90 residential units. The proposal to include 170 units represents severe over-development of this site. To achieve it, Lifestory is proposing a 16-storey block which is nearer the west boundary of the site (and therefore closer to Herald's Place) than the block in the previous, rejected plan. The 10 storey block next to the 16 storey one would increase the massing in the central part of the development and both blocks would interfere with sight lines to the historic water tower, in clear contravention of the rules governing development in this conservation area. The entire built environment around the Woodlands site is otherwise comprised of houses and flats ranging from 2 to 5 storeys, and any further development should respect this reality with

buildings up to 5 storeys maximum in the centre of the site, stepped down to match the heights of the 2 and 3 storey houses on three sides of the site. Anything else would cause unacceptable harm to the existing community, particularly in terms of overshadowing.

The additional traffic that a development of 170 units would generate is likely, we believe, to be far in excess of the small projected volumes in Lifestory's proposal and this should be checked by an independent authority. The proposal includes access for service vehicles via Renfrew Road only and this underlines the backlands nature of the site with no direct access to a main road. The additional traffic volumes on Renfrew and Gilbert Roads are likely to be far more significant than the developer is admitting, and the harm caused to our residents would be significant.

Finally, the large influx of new residents resulting from a development of this size, given the location and backlands nature of the site, would risk putting unsustainable pressure on local services and amenities. In the absence of any adjacent public park or amenity space, the very limited green areas in the proposed development are entirely inadequate for the number of new residents.

We therefore object strongly to Lifestory's proposal and believe that the development, if it was ever built, would cause harms to the existing community that would far outweigh the benefits that are being claimed by Lifestory. The proposal should be rejected.

Siobhan Coldwell

Tony Cowan

Carys Jones

Dave Parker

Paul Yaghmourian

Herald's Place Residents Association Ltd

Registered Office - 24 Herald's Place SE11 4NP Reg. No. 01809246

Directors: S Coldwell; A Cowan; C Jones; D Parker; P Yaghmourian

Secretary: A Cowan

Appendix 3: Kennington Place Management Company

A representation by Kennington Place Management Company on behalf of those living at Kennington Place (1-11 Polperro Mews and 9-31 odd Sullivan Road)

Comments relating to the Kennington Place Location

1. Agreed that the design and materials used are more appropriate.
2. We believe the new proposals are worse for residents of Kennington Place (1-11 Polperro Mews and 9-31 odd Sullivan Road) all of whose gardens face the development site (and currently have views of the Water Tower) because:
 - 2.1 The change in orientation of the towers means that residents will be adversely impacted by BOTH the 'Uncle' building AND the proposed 10 and 16 storey towers. These towers will shade the gardens and rear windows of all the properties for approximately 2.5 times as long as the shade currently experienced because of 'Uncle'.
 - 2.2 Residents of 7-11 Polperro Mews will be particularly badly affected being closer to the site and also experiencing detrimental affects due to the 4 & 5 storey blocks on the periphery of the site.
 - 2.3 The reduction in height of the taller towers is insufficient to make any difference to the adverse impact that will be experienced by residents of Kennington Place, particularly 7-11 Polperro Mews. Because the towers are so much closer the 16 storey tower will appear higher than 'Uncle' and even the 10 storey tower will have the same impact as a 28 storey high building adjacent to the 'Uncle' site.
3. Currently residents have very clear views of the Water Tower when entering Polperro Mews by the vehicular and pedestrian gates. These will be lost as will views of the Water Tower from the rear of these properties.
4. No indication has been given as to what the elevation of the peripheral blocks facing Renfrew Road and Castlebrook Close will look like. Residents of Polperro Mews will also be looking out on this elevation.

We understand that Lifestory have offered to visit and talk with affected communities and would invite them to come and see how their proposals would impact the lives of Kennington Place residents.

Additional Comments not specifically related to the impact on those residing in Kennington Place but wish for them to be included as feedback.

1. The footprint of the new proposals covers a larger area of the site than the previous application. This means that a larger number of the adjoining properties will be adversely affected - particularly in Renfrew Road and the properties on the corner of Brook Drive/Dante Road. It also results in only small areas available for play areas/amenity space of which only one is not adjacent to the vehicular route through the site: it is instead sited in an area between the 2 taller towers and the Water Tower boundary out of sight from the 3-bed properties in blocks E & F where families are most likely to be living.
2. The proposed buildings are set closer to the boundaries of the site and unacceptably close to a number of the properties in Brook Drive, Castlebrook Close, Renfrew Road and the Water Tower.
3. The 10 and 16 storey towers are too high. They obscure the silhouette of the listed Water Tower, and the windows and balconies of these towers will overlook the gardens of the Water Tower to an unacceptable degree. The height of the new development should be kept to no more than the height of the existing Bellway development surrounding the Water Tower.
4. Although the site area is shown to include the Cinema Museum (The Master's House) the area of the site available for development excludes this building and is in reality approximately 0.51 hectares. The proposed number of dwellings (170) equates to a density of approximately 330 dwellings per hectare, approaching the suggested density of 350 dwellings per hectare at which it has been proposed the term 'superdensity' should be used. This is clearly completely inappropriate and unacceptable for a site such as this, in the middle of predominantly low-rise developments.
5. In the current times with the effects of climate change being all too obvious, every effort should be made to ensure that all new development is undertaken in as sustainable way as

possible: high buildings are less sustainable than lower buildings both in terms of the building, maintenance and insulation – the higher they are, the less sustainable they are.

6. What provision is to be made for bicycle storage, bin stores etc.

7. The presentation does not mention that the plant for the towers will be positioned on top of the towers - what additional height will this add to the building and what will it look like?

Appendix 4: Statement on behalf of The Renfrew Road Townhouses Residents Association

14 September 2021

Having spoken to the vast majority of my neighbours and members of The Renfrew Road Townhouses Residents Association (RRTRA) at length, the overwhelming feeling on feedback to the new proposal is still one of anger.

This feeling has not changed since the online meeting on 14th July 2021, kindly organised by Councillor Davies to discuss the proposal which Lifestory attended and attempted to answer feedback questions.

None of the concerns raised by the people speaking at that meeting have made any difference to Lifestory as there have been no meaningful revisions since that meeting.

Many residents have pointed to the fact that the Planning Inspector (the highest authority in the land) indicated in his report that under topic paper 10A in the DRLLP published in 2020, the site is identified in a schedule of developable sites and suitable to accommodate 90 units. He added that such a development could secure public benefit without causing unacceptable harm.

This number is not a number just grabbed out of the air by some office junior, it is a balanced view of a highly skilled Planning Inspector, and it was pertinent that this was included in the very last paragraph of his 99-paragraph report.

At the online meeting on 14th July 2021, I personally asked Lifestory exactly how they arrived at the figure of 170 (or 150 -200) units being appropriate on this site.

I'm sure that all who attended would have seen and listened to Lifestory's bumbling reply which did not in any way, shape or form answer the question.

The RRTRA cannot see anything but greed as the reason for Lifestory's intended over development of this site.

There are certain advantages to the new scheme over the old proposal. Unfortunately, all these advantages come at the expense of worsening living conditions for existing residents. Lifestory wins - Everyone else loses !!

The new residents would gain better conditions and amenities therefore prices would probably be higher, and the private apartments would be easier to sell.

Existing residents, in Renfrew Road and others on the perimeter lose amenity including daylight, sunlight, overshadowing and privacy.

Everything Lifestory gains is stolen from existing residents. It is nothing short of a despicable ploy and completely unacceptable.

Most of the surrounding area is low rise apart from a few exceptions, The Water Tower development being one of them, which was built far enough away from existing homes to not do any harm.

Under the new proposal, the blocks at the back of the Renfrew Road Townhouses have actually been moved closer to our homes and in some cases another storey taller.

The RRTRA believe it was the GLA (revealed in a Freedom of Information request) who insisted that the block behind Renfrew Road was to be maximum 4 storeys in height but with the 4th storey set back.

Now for some reason, Lifestory see fit to raise the height in places to 5 storeys. The reasoning behind this is truly baffling if Lifestory's statements regarding starting afresh and rebuilding trust are anything but rhetoric.

This raises all the same concerns as the last proposal and more.

One of our residents, Kim Loddo (Renfrew Road) has written her feedback at length and in detail regarding some of the matters above.

Members of the RRTRA have pointed out that the new proposal seems like a monstrous mix of the mansion block idea and the perimeter housing idea from the last proposal which were both abjectly rejected by Lifestory themselves in the very early days even prior to the Public Exhibition. It seems incredulous that this idea is being rehashed and fed to us this time around.

As mentioned previously, we hear that Lifestory wants to start again, have better lines of communication and rebuild trust yet the new starting point is so dreadfully arrogant that reasonable debate is made difficult between the developers and the existing residents of the area.

The presentation at the on-line meeting leads us to believe that Lifestory think they have done all they can to satisfy residents. The RRTRA find it hard to believe how they can possibly misread the situation so badly.

We are certainly not satisfied with two community webinars which many of our aged residents will be unable to attend and with questions / time severely limited as they only last one hour and that is to include introductions and a presentation.

This seems to be paying mere lip service to their obligations regarding community involvement.

At the online meeting on 14th July Lifestory informed us that they had taken note and listened to the Inspectors report. This is total nonsense. They have cherry picked a few items and tried to convince everyone that they have made wholesale changes in our favour. This is blatantly not true.

Our association would also like to highlight the fact that although the height of the high-rise element has reduced, the overall footprint has increased. This is not listening and heeding the words of the Inspector, in fact we feel this is another element of the new proposal that is just as bad, if not worse than the old proposal.

It also seems obvious that the listed Water Tower's heritage is still diminished by a 16 storey block that is moved even closer to it than previously.

In finishing it is the opinion of the RRTRA that Lifestory have neither listened to the Planning Inspector who refused their appeal or to our residents in Renfrew Road.

We are outraged by Lifestory's latest proposed overdevelopment of the site.

We would therefore like Lifestory, along with their team to have a meeting in person with the RRTRA and also a meeting with the wider community as part of a public exhibition.

Yours
Terence Smith
Chairman - Renfrew Road Townhouses Residents Association.

Appendix 5: Statement about Lifestory's Initial Design Proposals, by Ms Kim Loddo, MA
(*Cantab*) Dip Arch MPhil RIBA ARB

Comments about the proximity of perimeter Blocks D, E and F to the Renfrew Road boundary, in relation to the rejected Appeal scheme:

- Lifestory stated that they were working to an 18m separation distance between new windows and the existing windows on Renfrew Road (RR), and implied that this was in accordance with the Inspectors Report from the public enquiry. In actual fact, the Inspector's Report (para 64 on pg 13) stated that "20 metres is regarded to be an appropriate separation distance between two storey dwellings in new residential developments, though this is based on the presumption that first floor rooms are bedrooms not living rooms, and that adjoining rear gardens are of similar depth."
- As such, the obvious conclusion from the Inspectors Report is that the separation distance to adjacent windows (whether bedroom or living rooms) should be greater than 20m and that the proximity to the boundary (i.e. the depth of the garden) should also be taken into account. I would also point out that the inspector found one of the reasons for dismissing the appeal to be the '*severe overlooking to the gardens on Renfrew Road*'. It is clearly ridiculous that the new scheme should reduce the distance from this boundary and claim it is responding to the inspectors findings.
- The usual rule of thumb regarding outlook and sense of enclosure (a line at 45 degrees taken from 2m on the boundary) would require a new 3 storey building to be set back by 7m from the boundary (more if it were taller). We would argue that this would be an entirely reasonable minimum standard that should be the starting point in the design of the perimeter blocks, to avoid abnormal and significant harms to the adjacent residential properties.
- The removal of balconies and living rooms (which were originally facing the rear gardens on RR) represents a tokenistic change in comparison to the refused scheme, moreover compromised by the increased bulk and closer proximity of the new scheme to the site boundary. Firstly, the Inspector's Report para 69 on pg 14/15, states that it "would be *visually intrusive in the outlook from those dwellings and gardens*" referring to properties on RR, Castlebrook Close and Brook Drive. Secondly, in his conclusions on the issue of amenities of residents of neighbouring properties para 70 to 72, he noted that "The proposed development would have a significant and unacceptable effect on the amenities of residents of dwellings around the site", and the adverse effect on the houses on RR would be "*severe*". This is much worse with this proposed new scheme which is predominantly 4-5 storeys and closer to the RR boundary than the rejected Appeal scheme.
- GF rear extensions where most people's living rooms are have not been considered. The Inspector commented that many people's living rooms were effectively at rear GF along RR boundary. This is where we would consider the 18M should reasonably be measured from, which would give 21M from the main first and second floor RR rear facades to the face of any proposed perimeter block.
- Unlike the previously rejected scheme, the affordable rented and intermediate provision can be spread from D, E and F, into blocks C and B easily. There is no reason why the affordable housing content has to be concentrated along the RR boundary. Unlike the previous scheme, the latest new proposed arrangement allows for it to be distributed around *all* of the perimeter blocks. This would allow the height, scale and massing of blocks along RR

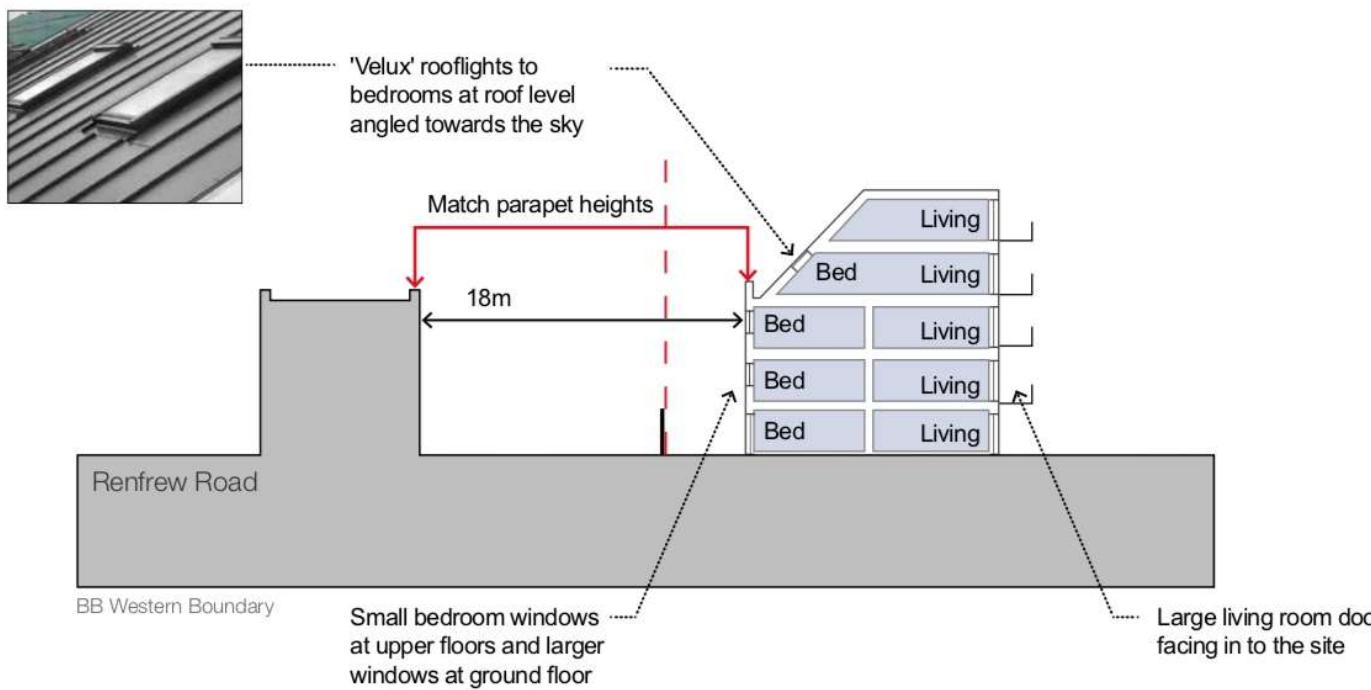
boundary to be reduced down/ pushed back, without reducing the number of affordable units provided by the new proposed scheme.

- Anthology/ Lifestory made the argument in the previous scheme that in order to have an appropriate amount of affordable units, the perimeter blocks had to be the height and depth they had shown; they stated that reducing their height would lead to the project providing less affordable housing, because a mixed tenure Tower wasn't viable. In this new Lifestory proposal (with its revised arrangement of blocks), this no longer holds true, as the tenure of some of the private units in blocks C and B could simply be changed to affordable/affordable rent, without increasing the total number of dwellings in these blocks. This redistribution would allow the height, scale and massing of blocks along the RR boundary to be reduced down/ thinned up/ pushed back, without reducing the number of affordable units provided by the new proposed scheme.
- The developers claim that the 90+% compliance with the VSCs sunlight and daylight standard was typical, and that generally schemes do not achieve 100% compliance, is disingenuous at best. It is true that many schemes do not achieve compliance with the VSC targets set out in the BRE report, but in this case the developers are working to VSC standards *that have already been reduced, on the basis of the Inspectors report*. This is clearly not right - if the inspector meant that the VSC target could be lower than the ones he identified, he would have said so. In order to meet the already reduced standards in the appeal decision, it is only reasonable that these already reduced standards must be met by 100% of the windows facing the site.

Comments about the proximity of Blocks D, E and F to the Renfrew Road boundary, with specific reference to Lambeth's Draft Design Code SPD:

Lambeth's Draft Design Code SPD is emerging policy and should therefore be considered alongside current policies. Part 2 contains advice to all development generally, and Part 3 deals with new buildings, and here are a number of paragraphs that are relevant.

- Part 3 Para 3.11 "Building Height and Mass: Rear Sites - On sites to the rear of established frontage development and within residential rear curtilages subordination with the street frontage buildings is essential in terms of maintaining the established spatial character of the borough and responding to the particular constraints presented by development of rear sites." This requires that the height and mass of Blocks D, E and F should be subordinate to the Renfrew Road houses, and in fact considers it "*essential*", as a response "*to the particular constraints presented by the development of rear sites*" like this one.
- The proposed Blocks D, E and F are in no way subordinate to the RR houses, as can be seen from this Lifestory section through both RR houses and the proposed blocks.



Appendix 6: West Square Residents Association (WSRA)

The West Square Residents Association (WSRA) Committee has discussed the new proposals and decided WSRA should oppose the scheme because the proposed 16 and 10 storey towers are too high and will clash with the character of the surrounding area, which has 2, 3, 4 and 5 storey buildings except for the listed Water Tower. The proposed towers will significantly harm the settings of the heritage assets of the Water Tower, Masters House, other listed buildings and the conservation areas of Renfrew Road, Elliott's Row, West Square & Walcott Square.

Terry Hanafin, Chair of WSRA

Appendix 7: Public Feedback

With the exception of a few individuals, feedback from members of the public has been anonymised to safeguard individuals' privacy and any identifying or personal information has been redacted. The appendix to the Residents Feedback report has been provided as a separate accompanying document in that format and only for the view, use and consideration of Lifestory Group, Lambeth Planning and elected representatives for planning evaluation purposes only.

The feedback is not to be published online without the expressed permission of StB who will seek the permission of the respondent.

If there are any comments which the aforementioned parties wish to discuss with the respondent that provided them, Stop the Blocks Community Action Group will liaise with the respondent and request their permission for the enquirer to contact and liaise directly with them.