# **GREATERLONDONAUTHORITY**

(By email)

Our Ref: MGLA170119-3479

5 March 2019

Dear

## Development of Woodlands Nursing Home, Dugard Way, Lambeth, London, SE11

Thank you for your request for information which the GLA received on 17 January 2019. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You requested:

...any information relating to pre-application discussions regarding development of the former Woodlands Nursing Home, Dugard Way, Lambeth, London, SE11 from December 2018 onwards.

For the avoidance of doubt please provide:

- *Pre-application advice reports or notes*
- The times and dates of any meetings held
- Notes of any meetings held
- Notes of any telephone conversations
- Email or written correspondence

The above includes, but should not be limited to, internal discussions and advice as well as correspondence with the developer 'Anthology'.

Our response to your request is as follows:

Please find attached the information we have identified as within scope of your request.

A small amount of information on page 19 of the attachment falls under the exception to disclose as defined in Regulation 12 (5)(e) (confidentiality of commercial or industrial information) of the EIR.

In considering whether withholding information is in the public interest, the GLA is mindful of regulation 12(2) of the EIR instructing authorities to apply a presumption in favour of disclosure. There is a general public interest in fostering accountability and transparency in respect of land development matters.

However, the GLA has taken into consideration the Information Tribunal decision Southwark v Information Commissioner and Lend Lease and Glasspool (EA/2013/0162). In this decision, the courts recognised the enduring strength of the public interest in maintaining the confidentially of negotiations that take place in relation to public/private sector partnerships:

Once you use private sector profit making organisations in order to help fund regeneration and to deliver infrastructure, social housing and other public goods, then inevitably considerations of commercial confidentiality and the need to avoid harm to commercial interests must be given full weight when assessing the public interests for and against disclosure.

In this case, the Tribunal balanced the public interest with particular consideration to the public interest in ensuring projects are not allowed to fail or be put into jeopardy; in public participation in decision making; and in avoidance of harm to commercial interests.

There is a strong reliance on public/sector partnerships to deliver affordable housing. The best interests of the public are served by ensuring that public authorities can deliberate robustly and comprehensively, consider all options and potential impacts, to reach the best possible decision.

As set out above, the GLA believes that publishing some of the requested information will harm both the commercial interests of others, and the future ability of the GLA to negotiate effectively in the future. Furthermore, publishing sensitive information shared under an expectation of confidentiality would deter partners from sharing similar information in the future. This would ultimately lessen the information available to the GLA, thereby impacting upon effective scrutiny and the ability for the GLA to meet its stated objective to facilitate more affordable housing delivery.

Based on this, the GLA believes that on the balance of public interest, our consideration falls in favour of towards non-disclosure of the withheld information at this time.

Please note that some of the content is exempt from disclosure under Regulation 13 (Personal information). Personal information relating to the names and contact information of staff members and constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual.

It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject. It is considered that none of the conditions allow the processing of the information apply in this case as the subjects have not consented to the use of their data for an alternative purpose (namely disclosure under the EIR).

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

Paul Robinson Information Governance Officer If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

https://www.london.gov.uk/about-us/governance-and-spending/sharing-ourinformation/freedom-information

From: Sent: To: Cc: Subject: Attachments:	John Finlayson 19 December 2018 09:34 FW: Woodlands and Masters House site - London Borough of Lambeth 2018-12-18 GLA Letter RE Woodlands Site and Anthology V1.pdf
Hi	
Do you know anyth	ing about the scheme ?
Juliemma and I had	a catch up with Lambeth last week and they're not keen on it at all.
Regards John	
From: Sent: 18 December To: Cc: John Finlayson < Subject: Woodland Dear	<pre>control london.gov.uk&gt;</pre>
Woodlands and N	Aasters House site - London Borough of Lambeth
I write regarding t	he following:
Developm	ent proposals for the Woodlands and Masters House site
GLA Loan 1	to Anthology for development of Woodlands and Masters House site
Please see attached	l letter.
I would appreciate	receipt of this email and a response to the points I raise.

Kind regards



.....

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18 December 2018

london.gov.uk

Dear

## and Masters House site - London Borough of Lambeth

I write regarding the following:

- Development proposals for the Woodlands and Masters House site
- GLA Loan to Anthology for development of Woodlands and Masters House site

I have reviewed Anthology's most recent proposals for the Woodlands and Masters House site located off Dugard Way on the former Lambeth Hospital site in Kennington. The proposals are unacceptable in design and planning terms.

The height, massing and proximity of the proposed tower to the Water Tower development will have a significant impact on sunlight and daylight to existing residential properties. The proposed tower will be of detriment to the setting of the listed water tower building and will impact the setting of the Brook Drive Conservation Area and views within the wider Kennington townscape.

The site sits outside of the Elephant and Castle Opportunity Area. Provision of 50% affordable housing, whilst welcomed, does not justify non-compliance with other policies within the Lambeth Local Plan, the current London Plan and the emerging new London Plan.

Given the issues with the current development proposals, I was concerned to understand that the GLA has loaned £21,854,000 to Anthology Kennington Stage Limited to progress this scheme. I request assurances that GLA consideration of the future planning application will not be prejudice by this loan. For clarity, I am questioning whether proper process is being followed.

I support development of the Woodlands site, however the current proposals are unacceptable and I would urge the GLA to consider how they plan to treat the application and pre-application advice.

Concern regarding this development is growing within the local community and an action group, members including town planners and legal professionals, is gaining momentum.

I have highlighted the location of my property in relation to the proposed tower (overleaf) showing the impact this proposal would have on me personally. Please confirm receipt of this letter and I would appreciate a response to the points.

Kind regards

Copies to:

london.gov.uk



[Exempt - Regulation 13]



Annotated image from Anthology London consultation



Annotated map from Anthology London website

Hi

18 December 2018 17:55 Woodlands and Masters (PDU 4963) pre-app water comments

Our flood risk, sustainable drainage and water efficiency comments for the Woodlands and Masters Site (PDU 4963) pre-app are below.

Flood Risk (London Plan policy 5.12, draft policy SI.12)

1. The site is Flood Zone 3 Defended and, under the NPPF, a Flood Risk Assessment (FRA) will need to accompany the application.

2. Environment Agency mapping shows parts of the site to be at high risk of flooding from the surface water. Other forms of flooding may also present a risk. The FRA should assess all sources of flood risk in relation to London Plan Policy 5.12 (and draft London Plan policy SI.12).

3. Where the site is found to be at medium or high risk of flooding from at least one source, or where there is a residual risk of flooding related to a breach of the River Thames defences, the FRA should also consider the need for flood resilience and emergency planning measures.

Sustainable Drainage (London Plan policy 5.13, draft policy SI.13)

4. The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy 5.13 (and draft London Plan policy SI.13). Where greenfield runoff rates are not feasible and robust justification is provided, a discharge rate of three times greenfield rate may be acceptable.

5. The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measures at the top of the drainage hierarchy set out in London Plan Policy 5.13 (and draft London Plan policy SI.13). Roofs and new public realm areas present an opportunity to integrate SuDS such as green and blue roofs, tree pits, bioretention and permeable paving into the landscape, providing amenity and water quality benefits.

Water Efficiency (London Plan policy 5.15, draft policy SI.5)

6. The residential components of the development should achieve a water consumption of less than 105l/person/day, in line with London Plan policy 5.15 (and draft London Plan policy SI.5).

7. Any non-residential components of the development should achieve the equivalent of an 'Excellent' rating on the water elements of BREEAM, in line with draft London Plan policy SI.5.

8. Water reuse should be considered for inclusion in the development to meet both water efficiency and sustainable drainage requirements.

Regards,

Flood Risk, Drainage & Water Policy Officer Development, Enterprise & Environment Greater London Authority City Hall, The Queens Walk, London SE1 2AA

Email:

Web: <https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity> Greening London / Greater London Authority Follow the GLA's Environment team on Twitter <https://twitter.com/LDN\_environment>@LDN\_Environment

<https://www.london.gov.uk/WHAT-WE-DO/environment/environment-newsletter> Sign up to our e-newsletter

From:Image: Sent:Sent:19 December 2018 13:35To:WriteON InboxSubject:FW: Proposed re-development of the Woodlands Nursing Home site London SE11 4TH

Please can you set this up as a WriteOn for me to deal with.

Thanks,

Team Leader – Development Management

GREATER**LONDON**AUTHORITY, City Hall, The Queen's Walk, London, SE1 2AA Phone: 020 7983

From:

Sent: 19 December 2018 09:54 To: \_\_\_\_\_\_ < \_\_\_\_ lon

To: Indon.gov.uk>
Subject: Proposed re-development of the Woodlands Nursing Home site London SE11 4TH

Dear

I understand that you are the case officer at the GLA with responsibility for the proposals being produced by Anthology for the re-development of the site of the former nursing home. A state of the site of the former nursing home. A state of the site of a formal planning application to Lambeth Council, to express some deep concerns to you.

, I was horrified to see what Anthology are proposing for this small site: in the region of 300 residential units, including a high rise tower of at least 30 storeys. The sheer density proposed on such a small site

together with its close proximity to two Grate Two listed buildings and a conservation area, make it totally out of keeping with the area. The effects on sunlight and daylight would be devastating.

Just as concerning is information I saw yesterday that the GLA has loaned Anthology in excess of £21 million in support of the re-development of the Woodlands site. Frankly, I find this deeply disturbing. Can I ask how the GLA, in assessing Anthology's planning application next year, can possibly look at it dispassionately and fairly when you are effectively in partnership with the developer? How can the local residents have any confidence that are concerns and objections will be given any weight at all?

I look forward a prompt response to the concerns I have raised.

Yours sincerely



From:	John Finlayson
Sent:	19 December 2018 13:40
To:	
Subject:	RE: Woodlands and Masters House site - London Borough of Lambeth
•	-

Hi

Thanks, very helpful.

Regards John

#### From:

Sent: 19 December 2018 13:33

To: John Finlayson < Cc:

@london.gov.uk>

Subject: RE: Woodlands and Masters House site - London Borough of Lambeth

london.gov.uk>

I had a pre-app in principle for this site (see attached note) and they are coming in for a full preapp on 9<sup>th</sup> Jan.

They are working towards delivering 50% affordable housing in the scheme plus the restoration and reuse of a listed building to house the Cinema Theatre museum, so there are benefits to the tall building!

The GLA loan has nothing to do with us. I'll respond to this via WriteOn.

From: John Finlayson
Sent: 19 December 2018 09:34
To: Indon.gov.uk>
Cc: @london.gov.uk>
Subject: FW: Woodlands and Masters House site - London Borough of Lambeth
Hi
Do you know anything about the scheme ?
Juliemma and I had a catch up with Lambeth last week and they're not keen on it at all.
Regards
John
From:
Sent: 18 December 2018 17:15
To: Indon.gov.uk>
Cc: John Finlayson < Iondon.gov.uk>; Juliemma McLoughlin < Iondon.gov.uk>
Subject: Woodlands and Masters House site - London Borough of Lambeth
Dear

## Woodlands and Masters House site - London Borough of Lambeth

I write regarding the following:

- Development proposals for the Woodlands and Masters House site
- GLA Loan to Anthology for development of Woodlands and Masters House site

Please see attached letter.

I would appreciate receipt of this email and a response to the points I raise.

.....

Kind regards

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From: Sent: To: Cc:	John Finlayson 19 December 2018 13:44 Heather Juman; Rickardo Hyatt Juliemma McLoughlin;
Subject:	RE: Woodlands and Masters House site - London Borough of Lambeth
Hi Heather, Rickard	ło
Can you please cor	nment on the GLA loan issue ? It would be useful to know the background before drafting a reply.
Many thanks	
Regards John	
John Finlayson Head of Developm Development, Ente City Hall, London	ent Management erprise & Environment
From: Sent: 18 December To: Cc: John Finlayson Subject: Woodland	<pre>&lt; london.gov.uk&gt;</pre>
Dear	
and	Masters House site - London Borough of Lambeth
I write regarding	the following:
Developm	ent proposals for the Woodlands and Masters House site

• GLA Loan to Anthology for development of Woodlands and Masters House site

Please see attached letter.

I would appreciate receipt of this email and a response to the points I raise.

Kind regards

.....

.....

From: Sent: To: Subject:

07 January 2019 12:22

RE: GLA 4963 - Woodlands and Masters Site

## Hi

I have added in where people are from (see below), and I have confirmed with the client that we don't need an energy representative for this meeting. Could you let me know GLA attendance and roles?

Thanks for the update and I will try and give you a call tomorrow.

## Thanks again



tp bennett LLP One America Street London SE1 0NE UK +44 (0) 20 7208 2000 www.tpbennett.com

architecture interiors planning

From:		<	london.gov.uk>
Sent: 07 Ja	nuary 2019	) 12:17	
To:			
Subject: RE	: GLA 4963	3 - Woodlan	ds and Masters Site

Thank you

Could you please tell me where everyone is from?

I can't provide you with an update just yet sorry as I would like to discuss the proposal with my urban design colleague first. I will meet with him tomorrow.



Hi

Happy new year! I have just left you a message. The attendance is likely to be:

Myself (tp bennett) (anthology) (anthology)



#### I will come back to you on energy!

It would be useful to discuss your thoughts in advance and I am happy to give you a call when you are available.



tp bennett LLP One America Street London SE1 0NE UK +44 (0) 20 7208 2000 www.tpbennett.com

architecture interiors planning

From:	<	london.gov.uk>
Sent: 07 Ja	nuary 2019 10:15	,
To:		
Subject: RE	: GLA 4963 - Woo	odlands and Masters Site

Good morning

Happy New Year. Hope you had a good Christmas.

Could you please send me a list of the colleagues that are likely to attend this pre-app meeting on Wednesday so I can add their names to the agenda that I am planning to send you later today?

Also, would you like our energy consultant to attend the meeting or are you happy with general comments at this stage? I haven't seen any detailed information on energy in your pack.

Thank you

Kind regards



To:

Principal Strategic Planner Development Management Greater London Authority City Hall, The Queens Walk, London SE1 2AA

Tel: Email: Iondon.gov.uk

From: pre-applications@london.gov.uk <pre-applications@london.gov.uk < Sent: 03 January 2019 11:35

london.gov.uk>;

Subject: GLA 4963 - Woodlands and Masters Site

Dear

Site: Woodlands and Masters Site, Woodlands, former Lambeth Hospital, Kennington , London, SE11 4TH

LB: Lambeth

Our reference: GLA/4963

Your request for a pre-planning application advice meeting has been confirmed for **Wednesday 9 January 12:00** at City Hall.

Please could you let us know who will be attending the meeting?

## PLEASE NOTE

Due to security arrangements, you must inform the Pre-app Support Team (email: <u>Pre-applications@london.gov.uk</u>) of **ALL attendees**. Anyone who is not listed as attending may be refused entry to City Hall.

Likewise, **if you want to have a model delivered** to the City Hall Loading Bay, we must be informed **in advance**. If we have not been made aware that a model is being delivered to the Loading Bay, it will not be allowed to be brought into the building.

## **Meeting arrangements**

When you arrive at City Hall for the meeting, please ask at reception for Bilal Iqbal. You should allow time to clear security. It would be appreciated if you could arrive together to ensure the meeting starts on time.

We can only comment on information provided in advance of the meeting. Where we have no or limited information we will not be able to provide a comprehensive assessment. The advice letter will only address issues that you have sent documentation on. The case officer will carry out a site visit and assess the documentation prior to the meeting. A meeting note will be sent to you two working days prior to the meeting which will outline the issues that will be discussed. Detailed officer level comments will be issued by letter no more than ten working days after the meeting, unless otherwise agreed with the applicant.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

## **Freedom of Information**

Since January 2005 the Freedom of Information Act 2000 has allowed the public to request information from public authorities including the Greater London Authority. The public will have a right to request information which includes pre-planning application advice and documents associated. Each case will be taken on its individual merits. If you have any concerns or wish to discuss this matter please contact

## Cancellation

If, due to circumstances out of our control, we cancel the meeting we will reschedule for another time as soon as practical. Meetings can be rescheduled at your request up to 48 hours prior. The fee is non-refundable on cancellation.

## **Comments and complaints**

If you are not happy with the service you have received and wish to complain or make a comment please contact

Yours sincerely

Pre-planning Applications Team

Pre-applications@london.gov.uk

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From: Sent: To: Subject:

07 January 2019 12:24

RE: Woodlands and Masters site 4963

Hello. I've taken a quick look at the draft HTVIA. It's still very much a work in progress and currently only sets out a methodology. The applicants still need to undertake the heritage assessments in relation to the proposals relating to the listed buildings on the site and produce maps identifying heritage assets, key views and renders/wirelines illustrating the impact of the proposals. In the absence of this information, it's difficult to give any feedback! Certainly the tall building will have a wide ranging impact that needs to be further assessed. At the moment, all we can do is hold judgement on heritage impacts and ask for more information.

As the site is fairly inaccessible, I would recommend a site visit, if possible....

Many thanks,

Senior Heritage Advisor Development Management Planning Department GREATER LONDON AUTHORITY City Hall, The Queen's Walk, London, SE1 2AA

@london.gov.uk

From: Sent: 07 January 2019 10:40 To: @london.gov.uk> Subject: Woodlands and Masters site 4963

Good morning

Happy new year! Hope you had a good xmas break.

I have a pre-app meeting for this development proposal on Wed.

I have attached the most recent advice note we provided to the applicant. It seems that they want to retain the grade 2 listed buildings on site but I understand that the tower they are proposing is controversial.

Would you mind having a look at the documents they sent through so we can discuss prior to the meeting (are you at city hall today and tomorrow?)? It includes a HTVIA saved here: S:\Planning Decisions\Cases\Cases\4963\Pre-app\Documents

Thanks!

From: Sent: 17 December 2018 10:20 To: @london.gov.uk> Subject: RE: Heritage Comments: Pre apps 5-9 November 2018.docx
The woodlands pre-app is on 9 January
From: Sent: 17 December 2018 10:15 To: To: Subject: RE: Heritage Comments: Pre apps 5-9 November 2018.docx
Great, thanks! I'll take a look at this and Project Forum today/tomorrow
From:
S:\Planning Decisions\Cases\Cases\4963\Pre-app\Documents
Hi
The documents for the woodlands scheme are now in the file.
Thanks
From: Sent: 13 December 2018 11:34 To: Subject: RE: Heritage Comments: Pre apps 5-9 November 2018.docx Hi Hi
From: Sent: 26 November 2018 15:13 To: Development Management < <u>D&amp;PTeam@london.gov.uk</u> > Subject: Heritage Comments: Pre apps 5-9 November 2018.docx
Hello. Please see attached comments. I'm keen to be further involved in the following:
4963: Woodlands and Masters site
Many thanks,

Senior Heritage Advisor Development Management

# [Diary Invite]

Thanks for doing this; if you want to swap with one of yours then feel free!



Subject: 4963 Pre-app Woodlands, former Lambeth Hospital, Kennington When: 09 January 2019 12:00-14:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London. Where: 4.1e

Dear all

This date has been **confirmed** by the agent. Please hold in your diary if you wish to attend.

**GLA reference number:** 4963

Site Name: Woodlands and Masters Site

Site Address: Woodlands, former Lambeth Hospital, Kennington , London, SE11 4TH

LB: Lambeth

Proposal Description: Erection of residential tower and perimeter blocks.

Case Officer:

From: Sent: To: Subject:	07 January 2019 17:57 RE: GLA 4963 - Woodlands and Masters Site
	[Regulation 12(5)e]
	Second and Second Se
Yes of course. See ye	bu then:
Thanks This is he	@london.gov.uk> 63 - Woodlands and Masters Site

From: Sent: 07 January 2019 11:33 To: london.gov.uk> 
 To:
 Iondon.gov.u

 Subject:
 RE:
 GLA 4963 - Woodlands and Masters Site

## [Exempt Regulation 12(5)e]

From: Sent: 07 January 202	19 11:31	
То:	<	london.gov.uk>
Subject: RE: GLA 496	53 - Woodlands and	Masters Site

Thanks

Is it worth having a 10 min conflab before the meeting to explain the background to the case? If so, **when's a good time to pop up?** My diary is free until the pre-app.

The press release around the sale of the property to Anthology can be found here.

Thanks,

From: Sent: 07 January 2019 11:26 To: @london.gov.uk> Subject: FW: GLA 4963 - Woodlands and Masters Site

Proposed terms of Cinema museum:

"Historically the Museum has been on a one year rolling lease, preventing it from accessing funding or having any certainty over its future. This proposal involves retaining the Museum and placing it on a permanent footing, allowing it certainty and funding security, and placing it at the centre of the development."

\_\_\_\_\_

From: Sent: 07 January 2019 11:13 To: Subject: RE: GLA 4963 - Woodlands and Masters Site

#### Hi

This is the last advice note we issued in relation to the above scheme. It seems that the plan is to retain the cinema museum.

See you this afternoon. Thanks

From: Sent: 20 December 2018 12:05 To: Subject: RE: GLA 4963 - Woodlands and Masters Site

I think it worked if you received 2 emails from me. This is the  $3^{\rm rd}$  one.

I don't know anything about the detailed of the proposal unfortunately. I will need to have a look at this after xmas.

From:		
Sent: 20 Decembe	r 2018 11:59	
То:	<	london.gov.uk>
Cc:		<u>@london.gov.uk</u> >
Subject: RE: GLA 4	963 - Woodlar	nds and Masters Site

Thanks

I can't access it unfortunately. Could you attach to an email instead?

I note from the attached there has already been a pre-app. It seems the Cinema Museum was mentioned. Do you know what, if any, assurances the developer gave about proposed terms offered?

Thanks

From:	
Sent: 20 December 2018 10:35	
To: @london.gov.uk>	
Cc: @london.gov.uk>	
Subject: RE: GLA 4963 - Woodlands and Masters Site	
Hi	

Can you access this file? It contains the development proposal's documents. S:\Planning Decisions\Cases\4963\Pre-app

I have also attached an advice note we produced when colleagues discussed the initial proposal with the applicant.

From: Sent: 13 December 2018 11:39
To:       <       london.gov.uk         Cc:       @london.gov.uk         Subject:       RE:       GLA 4963 - Woodlands and Masters Site
Thanks
Yes I am, I'll pop something in the diary.
From: Sent: 13 December 2018 11:37 To: @london.gov.uk> Cc: @london.gov.uk> Subject: RE: GLA 4963 - Woodlands and Masters Site

Hi

Thanks for your email.

It would be good to sit down and discuss. Are you back at work week commencing 7 January? The pre-app meeting is on the 9<sup>th</sup>.

Thanks

Hope you're well. Just emailing about the below pre-app as it impacts on a cultural organisation of strategic importance to the GLA culture team – the Cinema Museum.

I understand the applicant may be putting in two applications for the same site – one for residential elements and one for the museum – and just wanted to check which one this is for.

If it does have implications for the museum, would it be possible to have a culture team officer at the pre-app meeting?

Happy to sit down and discuss if helpful as this has a long and complicated history!

Best wishes

From: Pre-applications@london.gov	.uk < <u>Pre-applications@london.gov</u>	<u>v.uk</u> >	
Sent: 28 November 2018 10:45			
To:	london.gov.uk>;	<	london.gov.uk>;
Co. Dro applications (Dro application	ac@landan.gov.uks		

Cc: Pre-applications <<u>Pre-applications@london.gov.uk</u>> Subject: GLA 4963 - Woodlands and Masters Site

Dear

#### **GLA reference number:** 4963

Site Name: Woodlands and Masters Site

Site Address: Woodlands, former Lambeth Hospital, Kennington , London, SE11 4TH

LB: Lambeth

Proposal Description: Erection of residential tower and perimeter blocks.

On 16 November 2018 the Development Management Unit received your request for an initial meeting for the above pre-planning application proposal. The case officer assigned to this case is **set of the set of th** 

We can only comment on information provided in advance of the meeting. Where we have no or limited information we will not be able to provide a comprehensive assessment. The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

The advice letter will only address issues that you have sent documentation on. The case officer will carry out a site visit and assess the documentation prior to the meeting. A meeting note will be sent to you two working days prior to the meeting which will outline the issues that will be discussed.

### Finance

As per GLA Financial Regulations we can only confirm the meeting date upon receiving a correct application form.

The form you have sent to us is correct and we can confirm the meeting date upon receipt of purchase order information and your acceptance of the proposed meeting date and time at the bottom of this email.

In order to invoice the company paying for the meeting, we need to confirm whether they use a purchase order system. **Please could you confirm this?** 

If they do use a purchase order system, then a PO will need to be raised by them and sent to before the meeting.

## Cancellation

If, due to circumstances out of our control, we cancel the meeting we will reschedule for another time as soon as practical. Meetings can be rescheduled at your request up to 48 hours prior. The fee is non-refundable on cancellation.

We can offer a tentative date and time of **Tuesday 15 January 2019** @ **13:00**. Please let us know if this is acceptable and who will be attending.

Regards

Planning Support Greater London Authority

From: Sent: To: Cc: Subject:

08 January 2019 09:58

4963 Woodlands and Masters Site Pre-app Energy Comments

## Hi

Here are the Pre-app Energy Comments for the Woodlands and Masters Site (4963):

- The updated *GLA Energy Assessment Guidance* provides details on the information that should be provided within the energy assessment to be submitted at stage 1. See link for the latest guidance published in October 2018: <a href="https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0">https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0</a>
- The following targets are in effect for all Stage 1 schemes received by the Mayor as set out in the guidance:
  - **Residential** Net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations.
  - Non-residential 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The zero carbon target will apply to non-domestic developments when the new London Plan is adopted (expected in late 2019).
- The carbon emission figures should be reported against a Part L 2013 baseline. Carbon emissions for domestic and non-domestic elements of the development should be presented separately.
- From January 2019, and until central Government updates Part L with the latest carbon emission factors, applicants are encouraged to use the SAP 10 emission factors for referable applications when estimating CO<sub>2</sub> emission performance against London Plan policies. A spreadsheet has been provided for this purpose. Applicants will still need to provide an assessment of CO<sub>2</sub> performance using SAP 2012 emission factors to enable a comparison to be made. Applicants proposing to only use SAP 2012 emission factors will need to provide a justification for this.

## **Be Lean Demand Reduction**

- The applicant should commit to meeting Part L 2013 by efficiency measures alone as a minimum for both domestic and non-domestic elements separately. Applicants should note the new draft London Plan Energy Efficiency targets which set out the GLA's expectation for levels of improvement achievable for new developments:
  - o Residential 10% improvement on 2013 Building Regulations from energy efficiency
  - Non-residential 15% improvement on 2013 Building Regulations from energy efficiency
- Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.
- Information on the development's total energy demand (MWh/year) for each building use and the total Part L Fabric Energy Efficiency Standard (FEES) should be reported.

## **Cooling and Overheating**

• The domestic overheating checklist, included in the Energy Assessment Guidance, should be completed at pre-application stage and used to identify potential overheating risk and passive responses early in the design process.

- The applicant proposes a significant number of single aspect dwellings due to the site constraints this number should be minimised, and the applicant should consider that single aspect dwellings may require additional passive measures compared to dual aspect dwellings.
- Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the Cooling Hierarchy. Dynamic overheating modelling in line with CIBSE Guidance is recommended (TM59 and TM49 for residential and TM52 and TM49 for non-residential).
- The area weighted average (MJ/m<sup>2</sup>) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional.

## **Be Clean Heating Infrastructure**

- The applicant should investigate opportunities for connection to nearby existing or planned district heating (DH) networks. Evidence of communication with the relevant parties (i.e. stakeholders, local authority energy officers) should be provided.
- The site should be served by a single energy centre and the applicant should commit to providing a site wide heating network where all buildings/uses on site will be connected; relevant drawings/schematics for the energy centre and the site-wide network should be provided.
- The applicant should provide information confirming that the development is future proofed for connection to wider district networks now or in the future.
- Should CHP be proposed, applicants will be expected to provide sufficient information to justify its use and ensure that the carbon and air quality impact is minimised. See Appendix 3 of the Energy Assessment Guidance (October 2018) for further details. It should be noted that gas-engine CHP is not supported for small/medium developments.

#### **Be Green Renewable Energy**

- The GLA expects all major development proposals to maximise on-site renewable energy generation. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy.
- Solar PV should be maximised. A plan showing the proposed location of the installation should be provided and the applicant should demonstrate that the roof's potential has been maximised for the installation.

#### **Carbon Offsetting**

- Applicants are expected to maximise carbon emission reductions on-site. Where it is clearly demonstrated that no further carbon savings can be achieved but the site still falls short of the carbon reduction targets, applicants are required to make a cash-in-lieu contribution to the relevant boroughs' carbon offset fund using the boroughs' carbon offset price.
- Energy strategies should provide a calculation of the shortfall in carbon emissions and evidence of discussions with the borough agreeing the offsetting approach.

#### Monitoring

• The energy strategy should include information on how the building's energy performance will be monitored post-construction to enable occupants to monitor and reduce their energy use.

Kind regards,

Just to follow up on a few points:

- GLA Land and Property Limited has a £22m loan facility for this scheme, agreed through a Director's Decision (2305), attached. This is a loan on commercial terms which covers land acquisition and development costs, for the purpose of accelerating delivery of new homes. A first tranche has been drawn down, while a second tranche is contingent on attaining planning permission. Gwen, copied here, can provide more information as needed.
- Shared ownership homes are anticipated to represent 69% of the affordable housing provision under the current proposals for development, achieving 50% affordable overall as calculated by habitable rooms. London Shared Ownership is defined in the Housing Strategy as based on the national shared ownership model, but with extra assurances for Londoners over service charges. Homes must be demonstrated as being genuinely affordable to households with incomes under £90,000 (Policy 4.1.C.i). The Mayor has published a Shared Ownership Charter for Service Charges, with signatories setting out their commitment to work together to standardise approaches to service charges. The principles of the charter transparency, affordability and approach to design must be applied to all shared ownership homes funded through the Mayor's Homes for Londoners 2016-2021 Affordable Housing Programme.
  - o <a href="https://www.london.gov.uk/sites/default/files/so\_charter\_for\_service\_charges\_-\_final\_.pdf">https://www.london.gov.uk/sites/default/files/so\_charter\_for\_service\_charges\_-\_final\_.pdf</a>
  - o <a href="https://www.london.gov.uk/sites/default/files/2018\_lhs\_london\_housing\_strategy.pdf">https://www.london.gov.uk/sites/default/files/2018\_lhs\_london\_housing\_strategy.pdf</a>
- We heard today that Anthology are talking to RPs about acquiring completed homes to manage as affordable housing provision. As I mentioned today, I would be keen to learn which RPs Anthology have engaged thus far. I would appreciate our communication to Anthology that we would be happy to broker introductions to RPs who would be willing to manage rented units within a high-rise development containing homes of other tenures. I would discourage GLA from accepting (or being seen to accept) the argument that the built form of the proposed developments effectively caps the number of social rented homes as the number which can be accommodated in a stand-alone low-rise block within the development.

Please feel free to engage with us further in relation to the pre-app process. I imagine this development will be scrutinised closely given the use of public land and the GLA's investment of loan finance.

I Area Manager (South) I Housing and Land GREATERLONDONAUTHORITY 169 Union Street, London, SE1 OLL @london.gov.uk

From: Sent: 09 January 2019 10:37

To:

@london.gov.uk>

Subject: RE: 4963 Pre-app Woodlands, former Lambeth Hospital, Kennington

Rushing to a meeting, sorry see attcahed



Subject: FW: 4963 Pre-app Woodlands, former Lambeth Hospital, Kennington When: 09 January 2019 12:00-14:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London. Where: 4.1e

I am attending the pre-app on behalf of Housing and Land.

Do you have any documentation I can look at in advance?

-----Original Appointment-----From: Pre-applications Sent: 02 January 2019 15:14 To: Pre-applications;

Subject: 4963 Pre-app Woodlands, former Lambeth Hospital, Kennington When: 09 January 2019 12:00-14:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London. Where: 4.1e

Dear all

This date has been **confirmed** by the agent. Please hold in your diary if you wish to attend.

**GLA reference number:** 4963

Site Name: Woodlands and Masters Site

Site Address: Woodlands, former Lambeth Hospital, Kennington , London, SE11 4TH

LB: Lambeth

Proposal Description: Erection of residential tower and perimeter blocks.

Case Officer:



Hi Please see design comments

### 4963 Woodlands

Tower element

- Height is currently proposed at 34 storeys where the towers in the Elephant and Castle OA are taller. The initial VU city model shown at the meeting is potentially acceptable in terms of view. However, the applicant should submit VU city images with the town centre development included (and other developments) to fully confirm context of proposed tower to check)
- The scheme falls within panorama (extended) views but not within protected vistas, ongoing agreement of views with Lambeth is advised.
- Walcot CA view is a significant one, this should be developed sensitively regarding its materiality, design and relation to heritage context to check)

Design

• Film strip concept to relate to site heritage is positive, as is the contemporary link from remaining building element through tower and proposals.

Site layout

- A lighting study should be completed to ensure the height and massing of the tower does not create excessive overshadowing to the ground floor residential public realm.
- The location of the north east access is acceptable. The quality of this route should be higher as it will serve both residential blocks. E.g. clearer footways that are welcoming, legible and large enough for c.300 units, currently the main walking route towards the tower entrance appears to run over the carriageway or areas reserved for vehicles. There is also concern that the required vehicle movements/turning circles may compromise the functionality of the north east entrance as a pedestrian entrance and general ground floor outdoor space.
- Potential opening up of the north west access (bordering L&Q) to site could be useful and reduce pressure on the north east entrance.

- The applicant is advised to continue communication with surrounding site owners (e.g. Bellway and L&Q sites) to propose layout and designs that complement each other.
- It will be useful to submit a plan of the boundary fences across the site and any pedestrian routes/access points through boundaries. The location and type of these boundaries will impact the use and perception of residential space (including the quality of the under 5 play area south east of the tower).
- It might be more cohesive and beneficial to combine a larger play area for more age groups, potentially extending the 12+ area north west (towards the lower residential building).

**Residential quality** 

- The 4 storey block appears to be flats. Approx. 4 units per core (inferred from the landscape masterplan) is acceptable. Outlook of residential units facing the rear of Renfew Road dwellings should be carefully considered, including the incorporation of balconies/private amenity space for units.
- Perhaps stepped back mass at the top of the lower block could improve relation to Renfew Road houses, the proposed tower and shared public realm (regarding massing, design and natural light amongst sites).
- Avoid north facing single aspect units in the tower or 4 storey block.

#### Kind regards,

Urban Designer GREATER LONDON AUTHORITY | 4th Floor, City Hall, The Queen's Walk, London SE1 2AA | Web: <u>www.london.gov.uk</u>

From: Sent: To: Subject:	14 January 2019 13:14 RE: woodlands
Thanks fan	tastic.
<b>tp bennett LLP</b> One America Street Lo +44 (0) 20 7208 2000	
architecture interiors planning	
From: Sent: 14 January 202 To: Subject: RE: woodla	
Hi	
will contact yo café.	ou direct. Unfortunately I am not at the office tomorrow but she will be able to meet you at the
Kind regards	
From: Sent: 14 January 202 To: Subject: RE: woodla	< london.gov.uk>
Hi	
	meeting and we will have it ready? As I said I am mindful to run this through with m sure that we can get this over in advance.



tp bennett LLP One America Street London SE1 0NE UK +44 (0) 20 7208 2000 www.tpbennett.com

#### architecture

From: <a>Sent: 14 January 2019 11:14</a> To: <a>Sent: RE: woodlands</a>
Thanks
is only at the office today and tomorrow this week so if you could send the information to us today or tomorrow that would be helpful.
I understand that your client would like to receive the GLA report early next week
Thank you
From:     Image: Sent: 14 January 2019 11:10       To:     Image: Subject: RE: woodlands
Hi
Thanks for this and if you let me know some dates we will fit around you if at all possible.

We are in the process of updating the initial View assessment, and it should be ready today/ tomorrow, but I think it might be beneficial to present this and talk yourselves and through it rather than just send over.

The initial daylight and sunlight I understand aren't produced as yet, and I will pick up with the architects the routes through and the fencing.

#### Thanks and happy to discuss



tp bennett LLP One America Street London SE1 0NE UK +44 (0) 20 7208 2000 www.tpbennett.com

architecture interiors planning

From:	<	london.gov.uk>
Sent: 14 Ja	nuary 2019 10:13	
То:		
Subject: RE	: woodlands	

Thanks for getting in touch.

I will talk to about the meeting you suggested. she is free.

so I will see if/when

You mentioned at the meeting that you would update the initial VU city model with the town centre development and other development. If this is available could you please send this? It would be helpful to see to fully confirm the context of the proposed tower if available. Are there any Panorama or River prospect views, views of Walcot CA you could share with us?

Also have you undertaken any initial daylight/sunlight studies? It would be helpful to get a first understanding of how the height and massing of the tower is likely to impact on overshadowing to the ground floor residential public realm.

Finally, could you please send me an updated plan of the boundary fences across the site (and around the existing park) and any pedestrian routes/access points through boundaries?

The above would be helpful to inform my pre-app report, but I also understand that the design of the scheme is still work in progress so it isn't a problem if the information hasn't yet been produced.

Kind regards

From:		
Sent: 11 January	2019 13:31	
То:	<	london.gov.uk>
Subject: RE: woo	odlands	
Afternoon		

Hope you are well. I left you a message this morning picking this up, could we have a quick chat as it would be useful to sit down with sooner rather than later, so that this doesn't drift.

Thanks again and happy to discuss.



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architecture interiors planning

From: Sent: 10 January 2019 09:14

london.gov.uk>

Subject: woodlands

#### Morning

Thanks for the meeting yesterday and this was most helpful. We are putting together a document around the views, however rather than just send it in, I think we will all get the most out of this if we could sit down with (and hopefully yourself) to contextualise and go through it. This may only be in the GLA Café and take twenty minutes, but I do think it would be worth it. We can have this information prepared by the end of the week, so sometime next week would be perfect.

I am about to go out to a meeting, but more than happy to discuss



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10 October 2018 - 27 January 2019 sponsored by tp bennett



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From:Image: Constraint of the second sec

Hello. I've just finished my meeting to look through the scheme proposals and have the following comments:

- I recommended that the applicants undertake an assessment of the heritage significance of the site, including the setting of the existing listed buildings and identifying key views of those buildings originating from within and outside of the site. This will give a good baseline on which to evaluate the impact of the proposals and any proposed heritage benefits, including any proposed enhancements to the existing buildings, their setting or surroundings.
- The applicants have provided a series of views looking at the impact of the proposed tall building on the wider townscape. It is understood that the applicants are still in discussion with the LB Lambeth in relation to the viewing locations in order to ensure that the given views best represent the impacts of the proposals on the historic environment.
- We viewed the proposals in the context of wider LVMF views, including a number of river prospects and the view from Primrose Hill. In these views, the proposals are either screened from view or will have a negligible impact.
- In the views originating from Elephant and Castle and the Walworth Road (01 and 02), the proposals are seen very much in the context of this highly urban environment and existing/consented tall buildings. As such, the proposals are not considered to cause any harm to heritage assets in those views.
- In views originating from the Georgian conservation areas to the north and west of the site, the proposed tall building has the potential to create a high degree of visual impact, due to the relatively low scale of the buildings, the orientation of the roadways and the composition of the townscape around open public squares, which affords long views of the buildings surrounding the squares. In the meeting, the applicants acknowledged the need to provide a winter view for West Square to further illustrate the impact of the proposals. As currently illustrated in view 03, the proposed tall building (and most of the buildings on the opposite side of the square) are currently screened by vegetation and in the summer months it is therefore likely that the proposals would be largely screened from view. However, Walcot Square is more open in nature and the grade II listed Georgian terraces surrounding the square are largely visible. The top section of the listed watertower adjacent to the application site is also visible in views looking east and is seen against clear sky, enabling its distinctive form to be discerned. The applicants have illustrated 2 views from Walcot Square – views 04 and 04A. Both of these views show that the proposed tall building would be seen in the context of existing and consented tall buildings in the Elephant and Castle area. However, due to the relatively close proximity of the proposed tall building to the viewer, it would appear as a much larger and taller feature on the skyline and in the view looking east (04) it would fall in the backdrop setting to the water tower, thereby removing the clear sky behind the water tower and making its form more difficult to discern in this view. In my opinion, the proposals would result in a high degree of harm to the setting of Walcot Square Conservation Area, the listed buildings in Walcot Square and the listed water tower. This harm would be 'less than substantial' in policy terms and I would certainly encourage further discussions with the local authority to look at mitigating this harm (either thorough design or revisions to the scale of the proposed tall building) and providing appropriate public benefits to help balance any resulting harm to the historic environment.
- View 05 illustrates the impact of the proposals on the gardens outside the Imperial War Museum. The proposed tall building would appear on the skyline in the backdrop context of the gardens and the conservation area buildings to the south of the gardens. It could be argued that this causes some harm, however, given the emerging context of tall buildings on the west side of this view, I consider the harm to be

minor. My concern is more for the impact of the proposed tall building on the approach to the museum Lambeth Road. This view/s should be considered further and it needs to be shown that the proposed tall building will not break the silhouette of the museum frontage in this sequence of views. Such an impact would be considered to cause a high degree of harm and would need to be assessed further.

• Further work is still being undertaken in relation to the impacts on local conservation areas, including Kennington Park Road. It is recommended that this work is progressed and further analysis is undertaken on potential impacts, including views along Hayles Street, which appears to align directly with the site.

I hope this is of help. I have a paper copy of the early TVIA that I can leave on a desk – E21.

Many thanks,

Senior Heritage Advisor Development Management Planning Department GREATER LONDON AUTHORITY City Hall, The Queen's Walk, London, SE1 2AA

Please be aware that I work on Mondays and Tuesdays and may therefore be delayed in responding to your email

From:		
Sent: 14 Janua	ry 2019 14:45	
То:		london.gov.uk>
Cc:	<	london.gov.uk>
Subject: RE: w	oodlands	

Hi

I think I have crossed over e-mails; I have just received one from you for 2.00pm, which we are happy to accept!



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From:			
Sent: 14 Jar	nuary 2019 13	3:39	
То:			
Cc:	<		london.gov.uk>
Subject: RE	: woodlands		-

#### Dear

I am happy to meet tomorrow and run through the additional information with you. Any time after 10am is good. Just let me know...

Many thanks,



E:

Please be aware that I work on Mondays and Tuesdays and may therefore be delayed in responding to your email

From:	< <u>D</u>	
Sent: 10 January 20	019 09:14	
To: Subject: woodlands	< S	london.gov.uk>
Morning		

Thanks for the meeting yesterday and this was most helpful. We are putting together a document around the views, however rather than just send it in, I think we will all get the most out of this if we could sit down with final (and hopefully yourself) to contextualise and go through it. This may only be in the GLA Café and take twenty minutes, but I do think it would be worth it. We can have this information prepared by the end of the week, so sometime next week would be perfect.

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