



NAG Response to Lambeth SADPD Sites 18 and Site 19

Norwood Action Group opposes the outline plans for Sites 18 and 19 in their current form. It believes it is essential that Lambeth remove these two sites from the SADPD.

We welcome investment and regeneration into West Norwood, and believe that this is best achieved through true partnership working with the local community to ensure that we have a town centre fit for purpose for the next 100 years.

The SADPD plan is a poor and incongruent plan produced behind Lambeth's closed doors, trying to increase housing numbers the easiest way, namely by high-rise and high density tower blocks long discredited for family occupation. The plan takes no account of existing businesses, existing tenants, and the 21st Century needs of a net zero town centre.

The plan directly contravenes the Lambeth Local Plan 2021 despite the ink being barely dry on the LLP which was approved by cabinet in September 2021. The LLP makes it very clear that tower blocks over 25m high are inappropriate for this suburban part of the borough. Lambeth therefore cannot pursue the tower blocks specified in the SADPD without discarding key elements of the democratically approved LLP.

NAG fully endorses the Site19 submission by the Knollys Yard community and businesses, and what they have had to say by way of objection. We share their total opposition. (Their submission is attached to the header email)

Among those concerns are that the extraordinary site requirement costs of the road bridge and footbridge suggest that Lambeth would struggle to achieve any affordable housing on the site let alone 50%, given that costly constraint, unless they can illustrate otherwise with some sort of basic viability evidence. The NPPF is clear that planning policies should take into account viability, and that that viability evidence should be made publicly available at the plan-making stage: Unfortunately no viability evidence is provided in the SADPD.

Furthermore, the Council should consider the cumulative impacts of two major developments so close together which share the same road accesses, buses and trains, local services and facilities and also view corridors

With regard to Site 18, we are surprised and hugely disappointed that no reference has been made to previous plans for this site, namely:

- West Norwood Town Centre Master Plan 2009
- A Plan for West Norwood and Tulse Hill: Community Evidence Base Report
- West Norwood and Tulse Hill: A Manual for Delivery 2017
- Norwood Design Support NPA 2019

In summary.....

- We do not want top-down decisions steamrollered through
- We do want genuine consultation in developing a carefully considered plan
- We do want investment and regeneration in West Norwood
- We do want more homes for families
- We do want thriving local businesses
- We do want a retained and ever more vibrant local community

NAG RESPONSES TO SITE 18

VISION.

Site 18 is the demolition and rebuild of a quarter of West Norwood Town Centre. In any other town centre in the UK, plans on this scale would involve a significant public engagement programme, working with the community, shops and businesses to ensure that we have a town centre that is future-proof, fit for the 21st century, and meets the ambitions and hopes of the people who live and work here.

Over the years a number of studies and consultations have taken place about the future of this site. The outcomes of those conversations should be taken into account.

Since 2017 the Norwood Planning Assembly has been working on the Neighbourhood Plan to provide the ambitious mix of housing and town centre uses that is required to support not replace our existing offer, driven in partnership with the community at its heart

We would welcome investment and development on this site, however we need a vision that is exciting, ambitious, rewarding and truly compelling. It has to go above and beyond simply being a profit driven venture for the council and developers. The vision has to set the highest aspirations to regenerate and renew West Norwood, allied with an ethos of sustainability and the highest available environmental standards. It should also keep all that is good about West Norwood and valued by local people, rather than wipe everything away.

Norwood has ambitions to be a net zero town centre by 2030. This vision should outline how that would be achieved, and how this new development would be pivotal. It should be a vision for 2050 and beyond.

All over the UK town centre shopping precincts built in the 70's and 80's are being knocked down and re-built because they are no longer deemed fit for purpose. Big and small shop units once occupied by the chains are now empty and agents are struggling to find new tenants. We have to work together to avoid that here. That means having a powerful and clear 'WHY?' in the vision, and a fantastic and truly compelling narrative for any new scheme.

We need data driven research to predict what the retail, business and leisure needs will be in 30 years' time and design accordingly. There is no point building for large floorspace retail if what is needed are small independent outlets. There are no vacancies on Norwood Road despite (and perhaps because of) the pandemic and prior to that 18 months of Thames Water disruption. As our town centre has never relied upon the national chains to survive and then prosper, why wipe this out to eventually replace with what?

Green spaces and appropriate contextual scale are of huge importance. Building monolithic high storey blocks that dominate the skyline would be totally inappropriate. Describing a 12 storey block as 'discrete' is bizarre, given that is 60% higher than any existing building in the area and 4 - 6 times the prevailing building height in the town centre, which itself is higher than the suburban housing surrounding.

The proposals vastly exceed the height thresholds for the area set out in the Lambeth Local Plan which was formally adopted on 22 Sept 2021 i.e. exactly 5 months ago. The Lambeth Local Plan sets out the vision, strategic objectives and policies for development in Lambeth for the period 2020-2035. It forms the statutory development plan for the borough. The policies of the Local Plan were drawn up in light of an extensive evidence base of research and studies and a multi stage public consultation and involvement process. The independent planning inspector found the Lambeth Local Plan to be 'sound and legally compliant'. As such, it is not for developers to pick and choose which parts of the Lambeth Plan they find acceptable. It is not for council officers or elected officials to pick and choose from the Local Plan. Lambeth cannot backtrack on its own Local Plan policies without reopening and revising the plan and once more extensively involving the local community – residents, businesses and all those others with interests in or interested in the town centre.

Calculations for the number of residential and business units need to be made taking into careful account the overall opportunities, requirements and constraints for the area. It seems like the presented numbers have been plucked from the air rather than being derived from an intimate awareness of the place and its people and businesses.

A vibrant exciting town centre space where people can meet, work and contribute should be at the forefront of any design. It is therefore essential that a town square is large enough to be meaningful and form the heart of the design. However, it needs to be suitably located so that all those coming to West Norwood can enjoy, not hidden from the high street (as Waylett Place is currently) and seen as only for the occupiers of the surrounding buildings to

the rear. Furthermore it should be bright and sunny rather than overshadowed by development. Such a space must also be deliverable. As proposed it's reliant on a number of individual sites coming forward for development and funding its delivery and subsequent management and maintenance does not seem clear nor fairly shared between all landowners. We are concerned that ultimately development will take place without the town square and at best that it's not completed till the mid 2030's. Have other options for a town square or a number of smaller spaces been explored, be they existing or new?

The architectural quality and detailing should do far more than simply 'enhance the overall appearance of the town centre'. This statement in the consultation vision clearly demonstrates a total lack of any real ambition in the outline. It is not hard to 'enhance' an area. As demonstrated by the Vision Foundation and new arrivals in the town centre, paint, pride and care can work wonders. The architecture should therefore thrill, enthral and excite. West Norwood's new town centre should be a destination, one that respects the real pride and heritage of its history and people. It also should retain what is already good architecture and design and complement that elsewhere, notably our crescent opposite. We should not become an identikit town centre of anywhere or nowhere, nor lose our life and activity to vacant shops and other ground floor premises.

Sadly there is not a single page in the whole outline proposal that would elicit the briefest flicker of excitement.

Lastly if redevelopment is to proceed it needs to be in a way that does not blight the town centre for years – the Council themselves say the process will take 10 – 15 years. It could be longer given experience with other development in the area. Already we are seeing blight as landowners and developers and businesses delay investment in case there is something more profitable round the corner or because it's not worth it to be swept away very soon. This impact will spread beyond Site 18 to the whole town centre and beyond dwarfing the 18 months of disruption caused by the Thames Water mains replacement works.

SITE ALLOCATION POLICY.

1. Where is the data to support the statements within 'Land uses'? How has this figure of 390-470 residential units been calculated given the height of the proposed blocks exceed Lambeth's own criteria in the Lambeth Local Plan 2021? Is this figure only attainable if the developer breaks the LLP criteria? Is this number achievable notwithstanding the documents set out other demands on space like the wide footways, the town square and other public and private realm, pedestrian and cycle route to and through the area, rear servicing?
2. 5000-7000 sqm of commercial/community floorspace. Where is the data to back this up? How have future retail needs and trends been assessed ensure that this amount is viable so we don't end up with many empty lots? Who will fund the delivery and subsequent use of the community floorspace?

3. Where has the figure of 50% of units in shop use come from? What is the criteria on which this assumption has been made? Does a shop unit include space for the existing or successor restaurants, cafes and similar already on the Site?
4. How has the existing commercial business in West Norwood space been taken into account to ensure that this development doesn't simply create dead areas in other parts of the town centre or indeed within the CBC adjacent?
5. Affordable Housing. What criteria and calculations have been made to ensure that the development could actually deliver 35-50% threshold? Other new developments throughout London regularly downgrade this allocation percentage in order to make the scheme viable. What are the assumptions about the mix of such accommodation – the need is for family and other homes at affordable (to local people) rents? Even if the headline 35%/50% affordable housing is delivered will that be by units or size – more family homes to meet local need would mean in the latter case less affordable homes.
6. Given costs how will Lambeth ensure that the affordable housing units are of equivalent quality to market units and crucially they are maintained as such? As the development is to be significant height and massing how will the needs of families with children be met and then delivered and maintained? Whilst planning policy is for tenure blind schemes, maintenance and management would fall to the housing association or council as landlord of the affordable rented. Will those in shared ownership flats be able to afford the high service charges? In short is the affordable accommodation viable in the first place and will continue to be so as a place for those in housing need to live and enjoy?
7. Social Infrastructure. What data has been used to assess capacity in current social infrastructure with regard to schools, doctors' surgeries, etc. How will shortfalls be made up? Borough CIL can't pay for everything especially given, for example, the affordable housing would be exempt.
8. Heritage Assets. What criteria is being used to 'enhance the significance' of heritage assets? How will any design work with and complement existing buildings and spaces?
9. Building heights. The consultation document states that part of the site is 'appropriate for a tall building height of 36m'. Given that the maximum height of any building in the south of the borough under the Lambeth Local Plan 2021 is 25m, how has this figure of 36m been arrived at? By its own admission the document states that this figure exceeds the threshold definition of tall buildings. How is it possible that a building of this size could make it into the scheme, given that it openly acknowledges it is contravening Lambeth's own rules? How has this height been determined? It will tower above all else in the tower centre. How has its location at the rear of the proposed shops been determined? Why is the vista from Chatsworth Way so important given it's a residential street and the focus should be the town centre?
10. Other building heights. The indicative drawings clearly show that buildings of up to 21m would dwarf the existing buildings along Norwood Road, even if they are set back.
11. 'No harm to views affecting heritage assets' It is extremely difficult from the indicative outlines to see how this could be achieved. It is easy to see from the Council's own material how it is not achieved.

12. 'Respect context and create a balanced townscape with the Victorian frontage opposite'. The outline diagrams clearly show that 4-6 storey buildings of the size along the front would totally dominate and tower over the buildings opposite.
13. 'Active ground floor uses and key routes through the site'. How would this be achieved given the density of proposed buildings? Is there enough 'active' uses to fill the entire Norwood Road frontage and the routes beyond? Where is the evidence to show there won't be significant vacancy with inactive fronts to empty units? The experience of Ira Court comes to mind along with other recent developments in Tulse Hill and developers own viability assessments.
14. 'Provide a varied roofscape'. How would this be achieved, especially if the financial viability only allows for one principal developer? How could the site be split up into plots so that different architects and developers could ensure variety of shape and form? Which developer would draw the short straw and have to accept low rise less bulky buildings? How would they be compensated or indeed enabled to proceed with development?
15. Transport, movement and public realm. There is no proposal for any residents or public parking. How does this fit in with providing ev charge points for new buildings? What measure are being suggested to minimise displacement parking into already congested neighbouring roads? Has the Council assessed the viability of the shops and other uses with no car parking at all?
16. If this new public space is to 'provide a focal point for the town centre', how will placing it next to the largest buildings ensure there is enough light and rain to support a harmonious green public space?
17. Neighbour relationships. How will tall buildings of 6-12 storeys not impact upon the existing buildings adjacent to the site given they will be looking directly at each other, and will absolutely overshadow them? This includes the Council flats on the York Hill estate, the flats above the shops on the opposite side of Norwood Road and the side streets.
18. Energy and sustainability. The consultation says that 'every effort should be made to maximise contribution towards achieving net zero emissions'. Given Norwood's ambition to be net zero by 2030 and Lambeth's own borough-wide targets, this should be a commitment rather than wishful thinking. There is a lot of green-washing here. A development for the 21st century of this scale and size should be laying down clear non-negotiables when it comes to energy, sustainability and climate change issues. Why are these not built into the scheme as primary objectives? Why is this massive housing lead project not being designed to be 100% energy efficient when the technology and expertise exists to do so? This section of the consultation lays bare the shocking lack of future ambition for the project.
19. Air Quality. The consultation simply says that air quality be 'addressed'. This is weak. It should be a primary objective of any such scheme to have a non-negotiable commitment to reducing potential pollution, whether that be through heating and lighting systems or vehicle use.
20. Access to urban space – development should address existing open space deficiency. How is this going to be achieved given the density of building that is being proposed? It is more likely that this development will exacerbate open and play space deficiency in the area.

VISION MAP.

The map demonstrates that the 81m AOD building in the middle will clearly tower above even the highest local buildings of the York Hill estate which sit in an elevated position on York Hill. As such this diagram show how inappropriate a tower of this height would be. The proposed 81mAOD high tower would stand less than 40 metres way from the existing buildings/shops opposite on Norwood Road that are only 55m AOD high. The new tower would dwarf these businesses and the homes above and block out daylight and sunlight in the afternoons and evenings. Similarly in the mornings those living to the west would lose out.

CONTEXT.

Land Ownership. How many different landowners currently own the various site plots? Would the necessary CPOs make the site viable? Could compulsory purchase powers be justified and achieved to take away over 30 viable existing businesses and 80 families' and others' homes?

Existing land uses. How many of the tenants/shops/church and businesses have been consulted? How many of the current council tenants would be allocated new homes within any new development? How would the development ensure that businesses would not be lost for good in the area given the inevitable years of building works? What would happen to these residents and businesses whilst building work is underway? A particular issue if there is one comprehensive development.

Local Plan Place and Neighbourhood Policy. This section leads to the recently adopted Local Plan.

PN7A states that '*Development in the area will need to be of a scale and form related and appropriate to its context*'. How does breaking the threshold for building heights in this proposal fit in with the Local Plan? Or indeed with what already existing in West Norwood? PN7B *All ground floor units should be in active frontage and no fewer than 50% of ground floor units are to be in shop use.* What data and evidence is used to support these requirements?

PN7E *increase green infrastructure, improve access to open space and improve air quality.* What specifics are going to be applied to this Site 18 proposal. How will you improve air quality and by how much with regard to WHO guidelines? How will you increase green structure given the site size and the number of housing units that are being proposed? The two are incompatible. Tower blocks are notoriously environmentally unfriendly and historically contribute more greenhouse gases in their construction. To what standards will any new development hold eg Passive Haus?

Neighbourhood Development Plan. The Norwood Planning Assembly (NPA) has been working on a specific Neighbourhood Plan proposal for this site. Why has this new proposal not referenced all the work already carried out and taken heed of the community discussions that have been taking place over the last 15 years?

Views. The context document states there are no strategic views. The proposed massing and heights will mean that this development will totally dominate the views from all around and be visible from all around.

Access to open space and nature conservation. The proposal accepts that there is a deficiency of open space. However the proposed massing means that any open space on the new development will be limited including any new public square. Furthermore it will introduce at least 1000 extra people to an area of identified deficiency.

Neighbour Context: The proposed 11-12 storey block will be less than 40m away from 3-4 storey residential units on Norwood Rd. The maisonettes opposite on York Hill are 3 storeys and the York Hill estate a maximum of 5 storeys. The housing on Lansdowne Hill is predominantly 2 storeys. The proposed block is between 50-66% higher than any of the existing buildings. This clearly demonstrates how inappropriate the new proposal is.

EVIDENCE DOCUMENT

Section 1.3 The SADPD assumes that the site will be comprehensively developed. This assumes that the existing Victorian shop fronts and buildings behind would have to go along with the 80 families and other households and the 30 or so businesses.

Section 1.4 Refers to the Local Plan in how it approached massing. It doesn't explain why or how the LLP has been breached with regard to building heights.

Section 3.1. Key principles. With each of these principles there is an unresolved tension between the bulk and scale of the buildings with the objectives of creating wider pavements, improved permeability, safe spaces and through routes.

Section 4.1 and 4.2. The commercial space indicates clearly that on the ground floor we could expect 4 massive blocks and a very small public space. This is not the size and stature of a town square as all the other previous consultations have alluded to. This is simply a small space with a few trees that might house one of two benches. It is not the open focal point and meeting space that is required for a town centre.

Figures 14 and 17. How is it possible to have a 12 storey block that towers above everything be described as 'discretely located' and 'respects the high street scale'? This building would be 66% higher than the existing buildings along Norwood Road and would be visible from practically every angle. This is how it would 'help wayfinding'.

Section 5.1 The document states that the development should not be 'unduly dominant in its context'. It is hard to reconcile this given the scale of the buildings in relation to the existing building lines. A development on this scale for a town centre would totally dominate the townscape.

Section 5.3. The height and massing. Policy Q26 of the Lambeth Local Plan makes it clear that the threshold for tall buildings in this area is 25m. The proposal contains indicative

proposals for 36m, an increase of 50% above the maximum. It is therefore inexplicable that the SADPD has accepted this height as a possibility.

Section 6.1. The document states that the centre of the site can accommodate a degree of height c36m despite acknowledging elsewhere that this height is way above the threshold for acceptable building heights in the part of the borough (LLP 2021). How could this conclusion have been reached?

The indicative images do not take into account the proposed development at Knollys Yard. Both have a bearing on the impact on the town centre and wider residential area of West Norwood.

SUSTAINABILITY APPRAISAL

1. How will the affordable housing threshold be achieved? How will Lambeth ensure that financial viability of the development does not compromise the 35-50%?
2. How does the 70% low cost social rent and 30% intermediate housing work with the financial viability of the project?
3. Flexible workspace for creative businesses and commercial space. How has demand for these spaces been calculated and how does the development ensure that these are still going to be viable workspaces in 50 years' time? How will local businesses or even any business in these sectors be able to afford the space whilst the development remains viable?
4. What structures will be in place to encourage training for local people within the creative and digital workspace?
5. Community floorspace – *'existing church will have opportunity to remain on site'*. How has community floorspace been calculated given all the other space requirements on the site such as housing units? What is the opportunity being offered – space at a commercial rent as if offices?
6. Development will be car free. How will this development ensure that disabled and physically challenged people do actually have *'improved accessibility'*? Has the viability of the town centre existing businesses and new ones been assessed in a world without car parking, considering that which exists currently?
7. Local Plan Policies apply. How does this fit in with the proposed breaking the threshold height limits as specified within the Local Plan?
8. *'Site specific design principles will contribute towards ensuring high quality, attractiveness, character and sustainability of the built environment'*. This is a very poor quality threshold statement that basically says whatever is built will be at least better than the brownfield site it replaces. Lambeth have long viewed West Norwood and Tulse Hill as run down areas of low expectations. The design of even the most modern buildings reflects this attitude. 2 Thurlow Park Rd built in 2021 was designed by a very good architect yet is boring, monolithic and ugly. It could never have been built in a more affluent area. It typifies the current thinking within Lambeth planning. Nowhere has the council insisted on a standard of design that lifts the area, or raises the bar. When redesigning a brand new town centre we cannot settle for this low level standard of architecture. Einstein said that you cannot solve problems at the same level of thinking as that which created the problems. We cannot lift the area and have a town centre that is world class if we carry on doing

the same old poor quality designs. Indeed it would be better if we keep and improve the existing in such circumstances.

9. *'The site is considered suitable for a tall building'* How is this statement possible given it significantly exceeds the height threshold in the Local Plan? *'Design principles related to height are included in the policy'*. Which policy does this statement refer to? How can Lambeth say that the proposal adheres to current policy when it blatantly flaunts the Local Plan? Where is the evidence for this assertion?
10. How are neighbour relationships being acknowledged when 80 families and other households are losing their homes along with over 30 local businesses, and the proposed block will overshadow every single building in the area?

CONCLUSION

We ask the Council to now formally withdraw Sites 18 & 19 from the SADPD, and new plans be developed with the local community of residents and businesses, for the following reasons:

- There was no advance notification or involvement of community groups or the public.
- No notification or explanation of the apparent withdrawal of the 2009 Master Plan and the West Norwood and Tulse Hill: a Manual for Delivery 2017.
- Cabinet approval was on 13 December but it took until 6 January 2022 to notify Norwood community groups and offer an online briefing. This was held on the earliest possible date offered by the Council of 24 January. The West Norwood and Tulse Hill community has therefore been given less than four weeks to activate the community and respond following this briefing. The statutory consultation period of six weeks is therefore not being complied with.
- Insufficient time and resources allowed to adequately engage the community in understanding the proposals and their long term impact.
- The Council has not even informed those residents and businesses whose buildings would be demolished. Our neighbours and local shops face years of anxiety but no help is being offered by the Council.
- Very limited consultation methods only used; no attempt to reach hard to reach groups.
- The drafted proposals do not actively promote the Council's policy to address climate change.
- There is no evidence of the long-term impacts of the pandemic being considered and incorporated.
- The plans come across as a desktop exercise not tailored to local circumstances.
- Unlike the other 12 sites, sites 18 and 19 are major developments that will profoundly impact the retail and residential heart of West Norwood and Tulse Hill – one of the five town centres recognised by Lambeth.
- No other Lambeth town centre is to be affected in the same way by these development plans, so we believe that the consultation process must also be treated differently to reflect this.

- The tall buildings would be the highest in the borough south of the South Circular.
- The overwhelming evidence from feedback received (from door knocking with leaflets and also handing them out along Norwood Road on Saturday) is that the local community is against the plans for such massive over-development and destruction of our existing town centre and our 15 Minute Neighbourhood.

Prepared by Norwood Action Group February 2022.