



Dear Sir/Madam,

London Borough of Lambeth, Site Allocations DPD. Site 18

Regulation 19 Representations

I am writing as Chair of the Norwood Action Group (NAG) with our representations on this document in respect of the proposals put forward for Site 18, West Norwood Town Centre.

NAG was set up in 1999 with the objective of protecting and enhancing our neighbourhood. It is an independent group with over one thousand members – local residents and businesses and others with an interest in the future of West Norwood. Our particular focus is on planning, heritage, development and transport issues. We work closely with other groups including those others which are members of the Site 18 Local Stakeholder Group i.e. Norwood Forum, Norwood Society, Station to Station and the Norwood Planning Assembly, (responsible for preparing our Neighbourhood Plan). As such elected NAG Committee members have been part of the group of stakeholders assessing the various iterations of plans for West Norwood Town centre including most recently the SADPD Regulation 18 and 19 documents. We have gained the views of our members and the wider public and also participated when invited by the Council in the (very limited in our view) consultation which has been undertaken. Site 18, communicating with local people.

We are concerned with achieving objectives and as such are not anti- development and indeed have worked to lobby, canvass and campaign for projects, policy and schemes which deliver on local consensus for more housing affordable to local people, better local services and facilities and a thriving town centre and employment area. But this cannot be achieved in our view without real involvement from the people that matter - who live, work, run businesses, volunteer and care about the area. Regrettably Lambeth's proposals would in our opinion are unsound because they have failed to be grounded in these local objectives and aspirations.

We have worked with the other members of the Site 18 stakeholder group on their representations and I can confirm that NAG fully supports the comments made. We would urge you therefore to recognise the concerns about the Site 18 SADPD proposals.

Without wishing to repeat what others have said we would like to highlight two key matters which we would hope and indeed expect to be considered in determining whether the SADPD proposals for Site 18 are sound.

The independent viability assessment prepared for the Council by BNP sets out that there is not far short of a £50m viability gap i.e. to come forward each home would need around a £300,000 subsidy. There is no information provided as to how this enormous gap will be funded. Even with presumably what BNP consider to be an optimistic but possible sensitivity test, the gap remains at £30m, or £200,000 for each new home. Our concern is with such a large amount of funding to make up that there will be little or no affordable housing nor indeed the delivery of other requirements of national, London or local policy requirements, including the SADPD itself.

Secondly to deliver the SADPD development in West Norwood, significant site assembly is required. Lambeth are the freeholders of three relatively big sites but the largest is leased to B&Q until almost the end of the Local Plan period. Furthermore the remainder of Site 18 is in multiple freehold and leasehold interests, with few common parties and there are a large number of individual businesses trading in premises on Site 18 and still many residents. Whilst Lambeth say that the SADPD can be implemented incrementally some key aspects can't be such as footway widening which requires whole parades to be set back and the land mark tower and public square which appear to straddle public and privately owned sites. The vehicle servicing plans and planned routes for active travel would also seem to require coordinated development if not comprehensive. The outcome therefore that within the plan period little or nothing will happen in the plan period beyond blight of the Site 18 area as other development, even modest improvements, is prevented or discouraged by the uncertainty and which would spread to the rest of the town centre turning our thriving heart of the community into more and more of a ghost town. Meanwhile local people cannot access affordable housing nor businesses and other groups' suitable space.

We would therefore urge you to think again and put forward more realistic plans which are sound on the basis of the tests but also in meeting local needs, aspirations and opportunities. The local community is ready and willing to participate

Yours faithfully

Anne Crane

Local resident since 2002