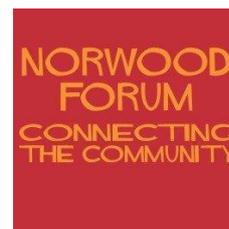


22 February 2022

Lambeth Site Allocation Development Plans - Draft: Site 18 and Site 19



Representations by Norwood Forum

Because these proposals have been presented the wrong way round – ignoring plans developed through consultation without reasoning and fresh community input, we are conscious we have needed to present forthright criticism of the Council’s Cabinet approved proposals in relation to Sites 18 &19. We want to emphasise our willingness to work with the new May 2022 elected Council, and with the assistance of our new ward councillors, to develop alternative proposals that will meet the needs and aspirations of the local vibrant community.

We ask the Council to now formally withdraw Sites 18 & 19 from the SADPD, for the following reasons:

- There has been insufficient time to adequately engage the community in understanding the proposals and their long term impact.
- 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.
- 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.
- This current approach ignores all the good practice community consultation that has previously happened, and the recognised capacity of local community organisations to deliver that level of consultation. As the [2017 Masterplan](#): Moving Forward: A Collaborative Approach to Delivery, describes:

It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.

- The drafted proposals do not actively promote the Council’s policy to address climate change.
- The overwhelming evidence is that the local community is against the plans for such massive over-development and destruction of our existing town centre.

If the Council chooses not to align itself with the wishes of its residents, we strongly advocate that the Council urgently communicates with all local people to explain its rationale for and likely impact of, its proposals for Sites 18 &19. We believe the Council has a duty to reach all local residents via an extensive outreach programme (start now with a mail drop to all homes and follow all the methods in the Statement of Community Involvement 2020). The Council has been more effective with its communications on the Street Improvements to West Dulwich consultation than on this SADPD.

We are also submitting detailed representations against the SADPD proposals for Sites 18 & 19, on the behalf of our local community in Norwood. We have leafleted and spoken to hundreds of local people and have reached many thousands more via social media. We have supported and worked closely with local residents groups, churches, schools, individual residents and local businesses to make their own responses. Overwhelmingly the response has been one of complete surprise - and against these proposals. From the copies sent to us, we know that many local people have sent in written email objections and expect their comments to be carefully reviewed and a considered

response sent in reply. Many others will have been unable to comment in the limited window available to them. The digitally excluded will be unaware of the proposals unless they were reached by one of our leaflets or our presence in the high street.

Norwood Forum is a member of the Lambeth Forum Network. We are tasked to: “work locally to increase the voice of local groups and residents in local decision making”. The Council did not approach us to promote these development plans apart from being invited to join the stakeholders briefing, and we have had to use our slim resources, already allocated in our annual budget, to produce leaflets, and to dig very deeply into the reservoir of volunteers in order to distribute them.

We trust the points we make below will result in serious engagement with the community to develop more acceptable plans in a co-operative manner.

1. Climate Change

As the Council is an influencer in addressing climate change, the proposals need to be reconfigured to ensure that all aspects reflect the green agenda. We do not understand why the proposals do not promote sustainability in an upfront way. We believe simply consigning sustainability to an appendix gives a poor impression of its importance. This should be at the heart of, and reflected throughout, the proposals.

We would expect these proposals to be redrafted to include a stipulation for sustainable construction and best practice working methods. Under the Government’s flagship Environment Bill, **Biodiversity Net Gain** (BNG) will become mandatory for all planning developments in 2023. It aims to secure a 10% net biodiversity increase in all developments. Why is this not referenced in these proposals?

Locally, we have led community plans to develop the concept of Norwood as a **15 minute neighbourhood**, and are pleased to see this has been mentioned in the vision statement for Site 18 (but not for Site 19).

In November 2021 we organised a **COP26Norwood** event to coincide with COP26 in Glasgow, where we contrasted the high-level international debates with our own micro-local level discussions on the realistic and practical differences we could make as individuals. [Read the report here](#). A COP27Norwood is to be held on 9 April.

As Emma Howard Boyd, Chair of the Environment Agency described in her Forward to the Environment Agency, Chief Scientist’s Group. (2021). **The state of the environment: the urban environment:**

“How we finance urban resilience sounds like an ethereal, academic problem, but really it’s a human one. The urbanist and author Jane Jacobs said: “There is no logic that can be superimposed on the city; people make it, and it is to them, not buildings, that we must fit our plans.”

The West Norwood and Tulse Hill community demands ambitious, environmental credentials for any development – whatever its scale.

2. West Norwood and Tulse Hill - Business Resilience

We believe our town centre has a strong and unique identity that blends independent business with residential accommodation in heart of our community. We have reached this enviable position organically and nothing in these new development proposals puts sufficient value on the sense of place that already exists in our neighbourhood. Local businesses have emerged strongly out of the pandemic and this delicate balance requires sensitivity not broad brush stroke development.

In their report **Positive Economic Update on Performance of our High Street**, Station to Station BID states: “Our high street has shown itself to be resilient, with lower vacancy levels, steady footfall and consistently higher spend in comparison to other areas within the borough”. There is an excellent diversity of businesses. Most local people walk or cycle to the independent shops and small local nationals.

Read more here: <https://stationtostation.london/positive-economic-update-on-performance-of-our-high-street/>.

Norwood Forum visited ten Norwood Road retailers who had asked for help to write their own response via Station to Station Bid. Whether lease holders or property owners they are all very angry not to have been told about these development proposals and are now extremely concerned about the uncertain future for their businesses. One retailer has finally just been offered a long lease – should he sign it? Another is about to start a development project – should they go ahead? A third owns several properties along Norwood Road and is astonished at the lack of contact from Lambeth. For all of them their businesses are their livelihoods and whilst some would welcome development, none are happy to have not even received an email or letter from the Council. Having suffered eighteen months of disruption from Thames Water, then the significant Covid impact on trading – only now is the economic situation finally beginning to look brighter, and all of them simply cannot believe that Lambeth would put forward these major and dramatic development proposals without a single attempt to directly inform them.

Our local businesses have shown incredible resilience during extraordinary times and deserve to be treated professionally.

3. Affordable Housing

The proposals need to state the Council recognises past difficulties in Lambeth (and elsewhere) in securing agreed levels of “affordable” housing. Innovative interpretations of legislation is needed to ensure the agreed levels are actually delivered by the developer.

A simple explanation as to the meaning of “affordable” would have been welcome. Furthermore, a statement of the number of affordable units (rather than a percentage) would have provided a level of transparency that is missing throughout the documents.

We appreciate that new housing is desperately needed, but it has not been possible with the information provided to understand the extent to which these developments will really meet and reduce local need.

4. Ambition

We do not feel the Council has provided the necessary leadership in the past so as to ensure previous plans were implemented. The Council’s apparent inaction has meant the West Norwood and Tulse Hill community has suffered from the large area at Site 18 remaining a blighted vacant site which should already have been developed for housing (including affordable), work/live units, business and retail units. The Council should have brought together the various owners and led the agreement of a programme to implement previous plans. Ultimately, it could have used its CPO powers to ensure the plans developed following consultation and in place were actually implemented.

Furthermore, the Council has not explained why these proposals do not reference the previous **2009 West Norwood Town Centre Master Plan**, the **2016 A Plan for West Norwood and Tulse Hill: Community Evidence Base Report**, or the **2017 West Norwood and Tulse Hill: A Manual for Delivery**. Specifically why has the 2017 Manual for Delivery become obsolete and replaced by the current proposals? These plans were not perfect but were at least developed to some degree with

the community so it is particularly frustrating for there to have been no explanation or willingness to reopen a dialogue.

We expect world class urban design that recognises West Norwood and Tulse Hill as an existing viable, successful, neighbourhood with an enviable strong sense of community. We do not want to see a swathe of “developer architecture”, but an ambitious incremental development with the community as an equal partner in an exemplary approach to town centre redesign.

Where is the reference to the London Mayor’s **Good Growth by Design** programme that: “seeks to enhance the design of the built environment to create a city that works for all Londoners. This means development and growth should benefit everyone who lives here. As such, it should be sensitive to the local context, environmentally sustainable, economically and socially inclusive, and physically accessible.” This is a readymade framework of six parts that includes “Setting Standards”. We expect nothing less for our neighbourhood.

Given West Norwood has lost two large artists’ studios in recent years (Bainbridge Studios and East Place), and the inclusion of a culture quarter in the Local Plan (and in the 2017 Manual for Delivery: as the **West Norwood Heritage and Cultural Area**, why is there no ambition to put Art and Artists at the heart of the proposals? See achievements by **LB Barking & Dagenham** as an example of what can be accomplished with vision:

www.theguardian.com/artanddesign/2021/dec/09/made-in-dagenham-the-artist-homes-designed-to-slow-gentrification

5. Inform and Consult

Forward Plan entry: the Council has not ensured local people were informed of the important key decision to be taken as an opaque title was used for the Forward Plan entry, there was no advice that Knight’s Hill ward would be affected through plans for large-scale demolition and redevelopment, and the published list of background documents did not include any reference to the key previous documents we list in section 4. Ambition.

Lack of pro-active pre-decision notification: why did Lambeth not inform the communities affected via the council-funded Lambeth Forum Network? This should have been done prior to publishing the Cabinet report or on publication of the report (or even immediately after the Cabinet approval on 13 December). In fact it took until 6 January 2022 to notify Norwood stakeholders and offer an online briefing. This was held on the earliest possible date offered by the Council of 24 January. The stakeholder group was therefore given less than four weeks to activate the community and respond following this briefing.

Statutory consultation: Lambeth states it is engaged in Regulation 18 consultation which commenced on 10 January 2022 and will finish at 11pm on 22 February 2022. Given the above paragraph, we do not accept the Council has met the requirements of Regulation 18.

Informing the public: we object to the Cabinet approved minimum methods of advising local people about the proposals. The limited consultation will be further limited in its impact due to the continuing use of “draft SDAPD” and not a clear statement about what this means (see above). The report states that consultation will be promoted widely through a database of those who have asked to be kept informed of planning policy consultations. Other targeted emails and online council website promotion will be undertaken. This is inadequate when the proposals have such a potential huge impact on our town centre. We understand that the residents and businesses at buildings proposed to be demolished at both Sites 18 & 19, let alone the close neighbours, have not been informed of their rights to object and offer comments. We find it most regrettable that the Council has not reached out to them to explain the possible scenarios and timescales, and offer tangible and ongoing advice over what is likely to be a long timescale full of uncertainty.

Consultation methods and timescale: the Cabinet report quotes the Council's own consultation policy: Statement of Community Involvement 2020 but does not explain why the laid down processes and timescales set out in that document, only updated in October 2020, are not being followed. There is limited online activity and copies placed in libraries only. The Council is not working collaboratively with the local community, partners and interested parties. There is no evidence at all of engaging with groups who do not traditionally engage in planning. Tried and tested ways of engaging people have not been used: e.g. public meetings, participatory workshops, public exhibitions, posters, leafleting, questionnaires, attending local society meetings - and an adequate timescale to undertake these activities. None of these methods is prevented by current or pending Covid-19 requirements. In fact it is clear no resources have been directed to achieve community involvement. This is a particularly important consideration for Sites 18 & 19 as the Council's proposals here have a much more severe impact on the neighbourhood and town centre than those for all other Sites (in short: scale of development/height/density/construction period).

Other communication methods: the Council should have published the developing proposals over the period since we understand the proposals first appeared in the forward plan in December 2020. For instance a series of articles could have been published on the Love Lambeth website and in Lambeth Talk; these could have given Site specific explanations for the developing proposals for each Site on a ward by ward basis and sought community involvement. Due to the pandemic public workshops and meetings were impossible at certain times; this makes it all the more regrettable that the Council did not have any intentions of engaging with local communities through imaginative methods and those included in the Statement of Community Involvement.

Key stakeholder group meetings to be held in different parts of the borough during the six week consultation period: as mentioned above this was not held until 24 January (and this was the first in the borough). The format of this online Teams meeting was of officers telling us the background (which we knew already through reading the Cabinet report) via a 45 minute PowerPoint presentation, and was something we had specifically asked not to be done. There was therefore only limited opportunity for oral responses to a series of written questions we submitted beforehand in order to maximise the efficient use of the limited time available. We feel the online nature of the meeting was not conducive to developing our mutual understanding of the issues and our community. For instance we do not know why the 2017 Manual for Delivery is not to be pursued, and if it has any remaining status. One advantage of an online meeting would have been for this to be recorded and made available for all to view afterwards. We asked for this in advance, but received no response and were then told at the meeting it was not possible. We were grateful for the short written answers provided the next day to our written questions. These answers often suggested we raise the questions during the consultation process, and these are therefore included in these representations.

Covid-19: the pandemic has had a major and likely permanent impact on people's work, shopping and recreational patterns. This factor alone means the Council is duty bound to explain how it believes its previous plans have been affected and consult afresh. There should be an explanation of the changes made to proposals in light of the extensive switch to home working. Will all flats be required to include a work space? There is no mention in the Cabinet report or consultation documentation of major social change being factored in.

Commonplace: for some time the SADPD Commonplace pages were not listed on the main Commonplace map – this further reduced the time that people could comment as there is no search facility on this website and unless you have the link to a particular consultation it can be very hard to find it. The SADPD consultation sought to further complicate the process by not using the typical map format but instead offering 7 different chapters of information for each site to comment under.

For all the above reasons, proper consultation has not been held, and the proposals must be removed from this current SADPD consultation.

6. Absence of a Detailed Master Plan

As already stated the Council needs to state it is withdrawing the previous 2017 Manual for Delivery. It is not clear why this was not part of the decisions taken by Cabinet. It is our understanding that in the absence of a master plan there is no indication how phasing will work. There is no clear design code/guidelines, so it would be easy for individual land owners to cherry pick individual components of the scheme (for example the tall building alone) without delivering the required infrastructure. A much clearer design and delivery framework is required.

Are there any proposals or controls that can be included regarding the phasing and sequencing of the Site? We sought clarity on these issues and were advised that officers are working on options for delivery and to raise our questions in the consultation exercise.

For the avoidance of any doubt, we expect at least the stakeholder groups to be consulted on the options for delivery. Issues such as the phasing of demolition and length of construction of new retail buildings will clearly be critical to the future of our town centre.

7. Site 18: Detailed Comments

Previous plans: We have already commented on the past failures to develop Site 18 and our fears on the lack of ambition shown in the current proposals.

West Norwood town centre: we feel the Council has painted a negative picture of our town centre in these documents. Its vibrance and future will be put at risk by these proposals since there is no detail on how existing businesses will be accommodated or how the building programme will ensure the impact on the high street is minimised. We suggest the following questions need to be answered here:

- Does the Council, as freehold owner of the Site, want to remove B&Q from the town centre or accommodate it - as we believe the vast majority of local people want. The roof top car park is used by shoppers visiting other shops in the town centre alongside their B&Q shopping. It is not acceptable to state "{the retention of B&Q} is not a matter for development plan policy. It is a critical issue for the local community, and an influencer on support or opposition to the scheme.
- Does the Council still want to attract a large supermarket to the town centre - contrary to the wishes of the majority of local people?
- How will small independent businesses be protected and found new accommodation in the new retail space at comparable rents?
- How will existing businesses such as car repairers be relocated locally?
- Further widened pavements may be welcome in some limited locations but why is there no mention of the need to accommodate a protected cycle lane along Norwood Road (this wish was established through the [Streetworks](#) project co-production meetings, but it was agreed that removal of car parking and widened pavements was a higher priority, and this was implemented to the degree possible in 2017-2019).
- As with earlier plans the petrol station will be removed from the town centre, but what provision or Site protection is to be put in place locally so residents can purchase petrol or diesel whilst petrol/diesel cars are still run (the next approximately 20 years?)

The variety of shops in our vibrant town centre go a long way to comprehensively meeting local needs and provide the bedrock of our 15 minute neighbourhood aspirations. However, this vision is not reflected in the Site 18 allocations policy. There is no need apparently to protect existing small businesses.

Vision

We believe that incremental development (within an outline Master Plan) is the only way forward as it enables the development to reflect change in the way we live our lives.

This statement omits the requirement to provide alternative accommodation for the current business occupiers such as car repairers. Keeping these essential industries in the local area will mean the demand is met locally and jobs are retained. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood.

The need to ensure that all aspects of the development address climate change is omitted.

We would expect an up-front statement here about how the proposals address the permanent impacts of the pandemic.

We expect world class urban design that recognises West Norwood & Tulse Hill as an existing viable, successful, neighbourhood with an enviable strong sense of community. We do not want to see a swathe of “developer architecture”, but an ambitious incremental development with the community as an equal partner in an exemplary approach to town centre redesign.

We would expect this document to include a statement that investment would be welcome that sees the community as a partner.

Site allocations policy

Affordable housing: see above general comments. A statement as to the expected number of units (rather than percentages) to be provided by each land owner would be welcome.

Social infrastructure: given the proposals represent a departure from the Local Plan, we do not understand how the requirements in the Local Plan can be adequate for the inflated size of the development, or how these requirements can be met locally.

Heritage assets: the planned extension to the West Norwood Conservation Area and adoption of the character appraisal needs to be reflected here, together with the timescale for adoption.

Building heights: it is not accepted that the Council has proven its case that “The central part of the Site is appropriate for a tall building” to the height proposed. Previous statutory plans have concluded that a less intensive use and with lower blocks is required. This remains the position in our view. Much of the new housing, and the homes of existing residents, will be overshadowed, as will the new open space.

Transport, movement and public realm: estimates on the impact on existing streets have been omitted. For instance, what additional traffic will be generated and (at a strategic level) what traffic management will need to be introduced. Where will cars be parked given our understanding is there will be no car parking provided in the new development, what plans will need to be put forward to introduce further Controlled Parking Zones in the area and what will the existing cost be to current residents.

Heritage assets: the planned extension to the West Norwood Conservation Area and adoption of the character appraisal needs to be reflected here, together with the timescale for adoption. We believe the height and intensive nature of the proposals mean there will be harm “to views affecting heritage assets”.

New service road: we do not believe it is possible to provide “a new service road to link York Hill to Lansdowne Hill, designed safely to accommodate possible pedestrians and cyclists”. We much prefer the already identified need for a protected cycle lane along Norwood Road to be met.

New open space: the possible usage and size of the planned new public space is not explained. Presumably the previous plan for a public square has been ditched as different terminology is used.

Urban greening: only limited urban greening has proved possible along Norwood Road under the Streetworks project due to officer advice that utility pipes and cables were too close to the surface

to allow tree planting. "Where possible" is inadequate; there needs to be a requirement to provide new trees (including mature trees) and other greening. The extensive overshadowing on the Site will reduce the effectiveness of greening.

Context

There are a number of errors/omissions in the description of the existing uses, as follows:

4 Lansdowne Hill (Chinese restaurant, possibly with accommodation above)

1-3 Sydenham Place (or is this industrial only)

The affected residential block on Lansdowne Hill. This is described as "8-12 Lansdowne Hill" rather than the correct 8-20 Lansdowne Hill.

The Iceland Site is included, but have all the flats above been included?

Presumably any errors/omissions these errors mean the number of affected affordable units is underestimated.

The planned extension to the West Norwood Conservation Area and the character appraisal needs to be added.

The first two sentences of the Description of the current Site character should be adjusted to state:

"A series of unrelated plots and dead-end routes comprising a large area between York Hill and Lansdowne Hill, under a number of different owners including the Council. The Norwood Road frontage, within the primary shopping area of West Norwood town centre, is lined with Victorian, 20th and 21st Century commercial premises (with residential above), including a large retail shed."

We object to the use of "retail shed". Whilst not of high quality design, the connotations of "out of town" shopping centre architecture is not valid here.

The Relevant planning history section should at least include the 2017 Manual for Delivery.

Evidence

The following comments demonstrate the flaws in the Evidence document and the false conclusions reached in understanding the design-led optimisation of the Site. The identified errors include the following (and no doubt other corrections have been highlighted by others):

Out of date photographs: e.g. "This, That and the Other Discount Store" at 294-296 Norwood Road (fig. 5) has been closed for at least 10 years. The Knowles of Norwood pub opened in 2014. The shop unit at no. 330 (fig. 4) has been occupied by a Caribbean bakery for at least five years. Many shop fronts have been updated in recent years (e.g. fig. 6); the Snooker Club is long closed. The picture you have tried to paint is of a declining shopping centre. The opposite is true; there are few vacant units and the shopping centre has a high number of independent shops and showed its great resilience through the Covid-29 lockdowns.

Omissions: no mention is made of the considerable and ongoing improvements to the streetscape of Norwood Road under the auspices of the Streetworks project - including the widened pavements, greening and large-scale removal of car parking. The impression given is of a town centre stuck in the 1990"s.

Planning documentation: para. 2.14 - from 30 November 2020 to 28 March 2021 Lambeth consulted on the proposed West Norwood Conservation Area extension and Character Area Appraisal. It is not understood why these proposals have not come forward for adoption. The evidence document does not explain the impact of this pending material planning consideration (although the extension is mentioned at TVIA 12).

Local views in Local Plan: for unknown reasons the designated views do not include the fine panorama views across the valley west to east from locations such as the summits of Lansdowne Hill and York Hill. These views are across to Sydenham Woods, Canary Wharf, the O2 and the Thames Estuary, and should have been protected by the Local Plan. An assessment of the impact of the development on these views should in any case have been included in the Evidence document.

The townscape and visual impact assessment undertaken (par. 5.1-5.4): this is inadequate due to:

- The omission of an objective of seeking high quality architecture that will relate to the eastern side of Norwood Road (including the Broadway), the listed buildings and Conservation Area (including the proposed extended area).
- The omission of consideration of the impact on the area to be included in the extended West Norwood Conservation Area.
- The statement conflates possible development capacity with optimal capacity. The proposals constitute a gross over-development of this suburban Site with extensive over-shadowing.

The highly subjective conclusions reached on the assessments of the views which are analysed. No proper reasons are given for conclusions such as “No harm to the setting of the listed building”, “No harm to the setting of the Cemetery as a registered landscape”, “No harm to the townscape” etc. These are not authoritative statements but opinion. The degree of harm will be affected by the eventual height of the constructed buildings and the quality of the architecture.

In particular we consider it highly questionable there will be no harmful impact on West Norwood Cemetery: townscape and visual impact assessment (TVIA) images 5- 11. The historic view across the West Norwood town centre will clearly change and we would argue this is to its detriment. We appreciate the tower blocks at Sites 18 & 19 will appear separate from St. Luke’s Church but feel the eye will be drawn away from the church tower to the modern tower blocks to the north and question whether for most people the church tower will retain its dominance.

We also disagree with the conclusion on TVIA 11 that the 22 storey tower will have a beneficial effect on the view down the road. This is at complete odds with the views of the residents we have encountered.

The impact of option 2 on the West Norwood Conservation Area has not been included but the analysis of option 1 copied and stuck by mistake.

The impact on 364-366 Norwood Road (Sainsburys Local – former FW Woolworth) has not been adequately considered as Site 18 and a possible five storey building is only a few yards away across the road (Lansdowne Hill). The description “The Site is to the north” is clearly disingenuous.

The key TVIA omissions are assessments of the impact on the panorama views of some residents of the York Hill estate and also the views from the summits of Lansdowne Hill and York Hill. We consider these omissions to be major flaws in the assessment of the impact of the proposals and that these assessments should be undertaken and notified before any further progress.

Sustainability appraisal

As already stated the context of the climate emergency and the Council’s role in addressing this should be at the forefront of these proposals. This sustainability appraisal contains some excellent proposals but is lacking precise detail in many areas. We are concerned that the proposals pay lip service only to the avowed intentions of the Council to actively address climate change. We note also that the sustainability appraisal has a score of neutral or uncertain effect on sustainability objective 10: To protect, enhance and promote existing habitats and biodiversity, and to bring nature closer to people where possible. We consider that the situation needs to be clearly established now and not left uncertain.

8. Site 19: Detailed Comments

Tulse Hill town centre: we feel the Council has painted a negative picture of our existing town centre in the documents. Its vibrance and future will be put at risk by your proposals since there is no detail on how existing businesses will be accommodated or how the building programme will ensure the impact on the high street is minimised. You need to explain in the documentation the envisaged impact on the businesses at the Tulse Hill end of our town centre.

Vision

This omits the requirement to provide alternative accommodation for the current occupiers of the Key Industrial & Business Area such as scaffolders. Keeping these essential industries in the local area will mean the demand is met locally, journeys reduced, and jobs are retained. These are essential parts of our local ecosystem that make Norwood a 15min Neighbourhood. It is said the current occupiers will go to the KIBA, but where specifically is their space for these?

The need to ensure that all aspects of the development address climate change is omitted.

We would expect an up-front statement here about how the proposals address the permanent impacts of the pandemic.

We expect world class urban design that recognises West Norwood & Tulse Hill as an existing viable, successful, neighbourhood with an enviable strong sense of community. We do not want to see a swathe of “developer architecture”, but an ambitious incremental development with the community as an equal partner in an exemplary approach to town centre redesign.

We would expect this document to include a statement that investment would be welcome that sees the community as a partner.

We record here our doubts that all the aspirations listed can be accommodated on such a constrained Site. Extensive new urban greening at ground level does not look achievable given the number of tower blocks with resultant overshadowing.

Site allocations policy

Land uses: The industrial and residential intensification proposed must rule out the existing users, primarily scaffolders, remaining on the Site. We do not agree with this approach, but this needs to be acknowledged here. It is not accepted that the Site is listed as having high potential to accommodate residential units and industry.

Affordable housing: See above general comments. A statement as to the expected number of units (rather than percentages) to be provided by each land owner would be welcome.

Social infrastructure: given the proposals represent an addition to the Local Plan proposals, we do not understand how the requirements in the Local Plan can be adequate for the gigantic size of this additional development, or how these requirements can be met locally.

Heritage assets: the planned extension to the West Norwood Conservation Area and adoption of the character appraisal needs to be reflected here, together with the timescale for adoption. We believe the height and intensive nature of the proposals mean there will be harm “to views affecting heritage assets”.

Building heights: the proposals represent a massive over-development of the Site with clusters of the highest tower blocks south of Vauxhall. There is no justification given for this Docklands-style development in suburban south London. Much of the new housing, and the homes of existing residents, will be overshadowed, as will the new open space.

Transport, movement and public realm: the current proposals to improve access are flawed. People living on the Site will want to get directly to West Norwood town centre/train station or the Tulse Hill shopping centre/train station. They are less likely to want to travel to Leigham Vale, albeit this is the route to Hillside Gardens Park. People travelling north through the Site will want to get to the Tulse Hill shopping centre/train station. For decades the Council has failed to successfully lobby TfL and the train companies to provide disabled access at Tulse Hill station. The opportunity should now be taken to use the local topography and new development to provide direct high level access for the existing local and new community to destinations such as Tulse Hill station. An additional cycle/pedestrian bridge is required – running parallel to the railway line at the north east pinnacle of the Site and running direct to Tulse Hill station and Norwood Road. The SADPD needs to present this as a requirement, with the Council working up the necessary engineering concept. For the avoidance of any doubt, all bridges and ramps must be fully accessible.

One question raised beforehand for the stakeholder meeting was the likelihood that the Public Transport Accessibility Level (PTAL) calculations were incorrect. We were told to raise this as part of the consultation exercise. The PTAL calculations will change with our recommended addition of a further cycle/pedestrian bridge. The question is as follows:

- The PTAL figures are incorrect and thus suggest a much higher public transport accessibility than in reality is the case. The high numbers also lend support to the proposed high density and tall buildings. Officers state 3, 5 and 6a. However at best only part of the Site can only have the PTAL of 3 – as exists at its entrance with the rest further distant from Cameron Place having 2, 1a or b or possibly even 0. The higher levels assume that you can walk over/under the railway lines directly to Norwood Road bus stops and Tulse Hill and West Norwood stations. It is possible to get manual calculations done to take account of barriers such as railway lines.

Furthermore, estimates on the impact on existing streets have been omitted. For instance, what additional traffic will be generated and (at a strategic level) what traffic management will need to be introduced. The bridges will all require traffic schemes, especially that for Knollys Road and York Hill. The implications for local residents must be clear at a strategic level. Given the identified Where will cars be parked given our understanding is there will be no car parking provided in the new development, what plans will need to be put forward to introduce further Controlled Parking Zones in the area and what will the existing cost be to current residents.

Urban greening: Whilst providing new trees (including mature trees) and other greening would be welcome, we have already mentioned our doubt that extensive new urban greening is achievable given the density of tower blocks with resultant overshadowing. The existing trees surrounding the Site are on Network Rail property. In the light of extensive tree removal works, recently including the railway embankments south of the York Hill railway bridge, trees neighbouring the Site must be regarded as under constant threat of removal although it is stated these are protected by a TPO.

Context

The planned extension to the West Norwood Conservation Area and the character appraisal needs to be added.

Neither Knollys Road nor York Hill have wide pedestrian footways. York Hill also only has a narrow pavement on the northern side and no pavement at all on the south side.

The nearby Lansdowne Hill bridge has artificial width restrictions to reduce the weight load on the bridge.

Evidence

The correct spelling is “Knollys Yard” and “Knollys Road” so corrections need to be made throughout the document, and “Road” inserted in the title on the title page. There are other typographical errors in the report.

Para. 2.17: 242 – 244 Norwood Road (grade II) delete existing description and insert:
This modest 19th Century villa stands on the western side of Norwood Road, immediately across the railway line from the Site boundary.

Add the proposed extension to the West Norwood Conservation Area as mentioned elsewhere.

Para.2.18 add: West Norwood Cemetery art mural at Norwood Road (Tulse Hill) railway bridge.

Para. 2.25 Delete: “Other KIBAs in West Norwood (particularly the existing, large commercial area KIBA) provide a good alternative for heavier, more bad neighbour uses.” Insert here the exact existing vacant KIBA locations that have been identified to accommodate the existing builders/scaffolders.

We do not believe the KIBA can accommodate these businesses.

Para. 4.2: see previous commentary on need to provide a high level cycle/pedestrian direct access to Tulse Hill railway station and Norwood Road and not rely only on a new cycle/pedestrian bridge to Leigham Vale.

Para. 4.4-4.8: see previous comments on height of proposed tower blocks.

Para. 5.1 No TVIA has been undertaken:

- from the rear of Ira Court
- from the eastern end of Leigham Vale or
- from the alley way from Station Rise to Norwood Road.

These are all locations likely to be affected severely by the development, and so are serious omissions that must impact the conclusions reached.

Para. 5.4: the views expressed on the 12 test views are subjective. We draw attention to TVIA View 7 – Cameron Place and the statement justifying the looming presence of the proposed tower that will: “increase the sense of intimacy.”

We consider it highly questionable there will be no harmful impact on West Norwood Cemetery: townscape and visual impact assessment (TVIA) images 1 & 2. The historic view across the West Norwood town centre will clearly change and we would argue this is to its detriment. We appreciate the tower blocks at Sites 18 & 19 will appear separate from St. Luke’s Church but feel the eye will be drawn away from the church tower to the modern tower blocks to the north and question whether for most people the church tower will retain its dominance. No reliance should be placed on tree cover covering affected views as trees can be felled.

Para. 5.5: add impact of West Norwood Conservation Area extension (proposal is mentioned briefly at TVIA 12).

Para. 6: the statement under residential amenity is not accepted; see above for omitted views and commentary on subjective statements made.

Sustainability appraisal

As already stated the context of the climate emergency and the Council’s role in addressing this should be at the forefront of these proposals. This sustainability appraisal contains some excellent proposals but is lacking precise detail in many areas. We are concerned that the proposals pay lip service only to the avowed intentions of the Council to actively address climate change.

9. In Conclusion

We trust our comments will cause the Council to withdraw Sites 18 & 19 from the SADPD. If regrettably this does not happen, we urge the Council in the strongest terms to work closely with our community to produce schemes that attract further investment leading to careful regeneration that protects our local businesses and provides more homes – especially affordable and for local people - and the much needed workspace. There is no place for tall tower blocks in our unique and vibrant neighbourhood and it is essential that any development proposals puts significant value on the sense of place that already exists.

One further constructive thought; the Council could resolve work in partnership with the Norwood Planning Assembly and their established framework. The Council would need to provide the necessary resources in the short term to finish the developing neighbourhood plan with community endorsed development proposals for Sites 18 and 19 at its heart. This would benefit both our neighbourhood and the Council.

We look forward to receiving detailed responses to our representations and to working with the Council and other stakeholder groups to ensure Sites 18 & 19 are redeveloped using the highest standards of community consultation, urban design, sustainability and long term project management.

Our community deserves nothing less.

Kim Hart
Chair
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