

# THE NORWOOD SOCIETY

*The Heritage Society for Norwood*

[www.norwoodsociety.co.uk](http://www.norwoodsociety.co.uk)

## **Lambeth SADP PSV Site 18 Regulation 19 Representation from the Norwood Society**

The Norwood Society objected to the original draft proposals for the SADPD in February 2022 to both Site 18 and 19. The Statement of Common Ground states that Site 19 has been removed from SADPD, one of the reasons given the “significant local opposition to principle and scale of development”.

Site 18 also had significant local opposition to the principle and scale of development. Although a number of changes have been proposed including the amendments to the site boundary and a reduction in number of residential units and quantum of commercial /community floorspace no significant changes have been made to other development principles. A tall building on the site remains, reduced from 36m to 31m we are told in the responses that it is will only be considered if certain conditions are met. One of our major concerns was that this policy as set out would allow the demolition of all the buildings within the site boundary, this would include the oldest shopping parades in West Norwood circa 1870. The response to our objection (R0228 Vision page 512 Officers response to Reg 18 Representations) on loss of the shopping parades was “only the section of Victorian shopping parade between 300 and 346 Norwood Road will be affected. Victorian shopping parades are exceptionally common across London. Having revisited all the existing buildings for their heritage interest, officers have concluded the examples within the revised site boundary exhibit no characteristics which might deem them to be treated as heritage assets.”

We do not think that the proposals for Site 18 are sound for the following reasons:

### **Legally Compliant**

We do not think that the Regulation 19 consultation is compliant in that it has been carried out within the pre election period (PEP) for the election of the London mayor and Assembly members. Although promised to discuss amendments to Site 18 with West Norwood representatives and at the Cabinet meeting (15.1.24) promised there would be further public engagement and feedback sessions to speak to local residents. Further the Cabinet member was advised not to attend a meeting with senior officers and West Norwood stakeholders because of restrictions on activities required by PEP. Given that this consultation contains controversial matters we consider that it should have waited until after the election or the period be extended to allow for meaningful consultation that includes elected members. As the NPPF states that the plan making system should be a platform for local people to shape their surroundings, we consider that the Council has failed and ignored residents Regulation 18 submissions. The proposed SADPD for

Site 18 could allow the change to the heart of the community forever, residents should have a say.

### **Positively Prepared**

We do not think that the proposals for site 18 have been positively prepared. The potential for demolition of all the buildings within site 18 is not sustainable with the loss of the Victorian core of the shopping centre and with it, loss of all the business. It is not enough to say that “plans for the relocation of the existing businesses on site will depend on the nature and timing of development proposals that come forward” (p 513 Reg 18 responses). There is a lack of recognition of the importance to retain these buildings and the significance these businesses have to the ongoing vitality of West Norwood and the contribution they make to the 15 min neighbourhood.

### **Justified**

The retention of the Victorian shopping parades has been dismissed, as officers consider that Victorian shopping parades are common and the buildings have no exceptional characteristics. They might be common in London but many town centres consider Victorian shopping streets an asset and aim to enhance and refurbish not demolish. The case for retaining these building has been set out in Mark Fairhurst’s (part of the community stakeholder group) submission , as a heritage asset and the negative impact on the loss of retail units/businesses in the town centre and the negative impact on the nearby listed buildings and conservation areas. The proposals should have considered the retention of these buildings as an alternative to total demolition.

The current policy for site 18 in the Local Plan states “the development should respect the rich conservation value and heritage of the town centre, taking account of factors such as building heights .....avoiding a canyon effect”. These proposals are a step backwards with the over dominant scale of buildings including a tall building 31m that would be totally out of character of and damage the setting of St Luke’s Church Listed Grade II\* the West Norwood Conservation Area including West Norwood Cemetery.

### **Effective**

Given the nature of the site with multiple owners it is questionable if the proposals as set out are deliverable within the timeframe of the plan. This site has been allocated as a development site for at least 13 years and so far only piecemeal development has been undertaken.

### **Conclusion**

The community really does want to be part of the solution to the develop the opportunities this site holds. This is evidenced by the working together of the stakeholder group and the large number of residents commenting on the Regulation 18 consultation. This can only be done through engagement with local residents, groups and ward councillors it will be too late when planning applications are submitted to influence the content and quality of a development if it is following the guidance set out in the SADPD PSV.

We therefore considered that Site 18 should be removed from the SADPD PSV and officers work with the local community to achieve a plan that delivers the Councils objects and meets the need of the local community.

The Norwood Society is part of the West Norwood and Tulse Hill Community Stakeholder Group and wish wish to make it clear we are requesting the opportunity to make personal representation to the inspector as part of that group.

Please confirm receipt of this email.

Regards

Marian Girdler

Chair of the Norwood Society Planning Sub Committee

2 May 2024