

# Site 19 Knollys Goods Yard/ Triangle

## SUMMARY

1. The policy for Site 19 is a major departure from existing place shaping approaches to West Norwood. And in light of the overwhelming number of resident objections, despite an inadequate public consultation ward, councillors request the site is withdrawn from the current SADPD process.
2. We request the policy for Site 19 is subject to a properly resourced & detailed consultation with local residents and groups including the Norwood Planning Assembly which was approved by the council in July 2017 to develop a Neighbourhood Plan.

## CONSULTATION PROCESS

3. The consultation on the SADPD has taken a minimalist approach. The key council message has been about the general SADPD process - a concept unknown to most people who are not planning professionals or developers.
4. There has been no council communication drawing attention to each of the 14 sites. For example, the Love Lambeth post on 2/2/22 (3 weeks into the 6-week consultation period) does not specify any of the 14 sites. Indeed, the accompanying photo is of town hall.
5. The invitation to ward councillors to attend an SADPD meeting did not mention the sites in their ward. How many ward councillors were actually able to attend the online meeting set up for them?
6. The Lambeth SCI states:

*"The National Planning Policy Framework states that plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. The council needs to therefore identify and engage at an early stage with all those that may be interested in the development or content of a local plan, including those groups who may be affected by its proposals but who do not play an active part in most consultations (including groups with community engagement challenges)"*

7. Bearing in mind the ambitious & transformative nature of the place changing Site 18 and Site 19 policies it was particularly appropriate for these sites to be subject to Stage 1 preliminary pre-production consultation rather go straight into Stage 2 of Regulation 18. Which of the 14 sites in the SASPD had the benefit of a Stage 1 consultation or were they all a total surprise?
8. The email networks were the main channel used by the council promote the overall SADPD. To effectively engage with local people the identity of the local sites needed to be publicised. Councillor requests for drop in events were refused. There was no edition of Lambeth Talk published during the six weeks of consultation.
9. One of the biggest barriers to equality is the digital chasm. Using a complex online platform to collect comments is not in accordance with the council's intentions to tackle equality. The SADPD Consultation & Engagement plan agreed by Cabinet on 13/12/22 delegated engagement to local forums and it was ward councillors who were tasked to engage with groups the council has difficulty in reaching.
10. Uncertainty of the likelihood of the project proceeding between 2021 and 2035 will cause planning blight on nearby property owners particularly 176-198 Knollys Road, 20-88 Harpenden Rd and 100-127 Leigham Vale. How will these residents be kept up to date with the progress of Site 19?

11. Despite this minimalist approach to consultation & engagement nearly 900 comments were made about the 14 SADPD sites in 6 weeks – and the comments about Site 19 totalled 25% of the total for all other 13 sites combined.

12. The comments are overwhelmingly questions and objections. This indicates the level of concern in the community about the impact of ambitious Site 18 and Site 19 policies. And with hindsight a Stage 1 consultation would have been a useful and sensible step.

13. What criteria will be used to assess the worth of this significant opposition to the policies? Will a further public consultation be organised in advance of the Regulation 19 consultation scheduled for December 2022 in which is limited to a technical focus on the “soundness” of the policies? Would a better approach be to withdraw site 19 from the current SADPD process?

14. Who will be the bodies involved in Statement of Common Ground for site 19?

15. What are the outline terms of any current lease Network Rail has agreed for the site?

16. Which property developers are assisting the council to devise the policy for Site 19?

## **VISION**

17. Site 19 is not a very large site 12,100 sq metres equal to 1.6 football pitches. The question is whether the level of intensification required to make it financially viable suits the nature & place of West Norwood.

18. As the freehold of this site is currently in the hands of Network Rail the policy needs to take a more ambitious approach and integrate the site with a programme from Network Rail to modernise the local rail network – Tulse Hill station, rail bridges over roads and road bridges over rail during the next 40 years.

19. The ambition to remove the nearby Tulse Hill gyratory needs to be considered in the Site 19 vision.

20. How future proof is this scheme? How far ahead is the anticipated development expected to last? Is the return on capital invested to be achieved 30 or 50 years? What will it look like and how will it be used in 2060 and 2080?

21. How much public grant subsidy will be necessary to achieve the vision & make the site viable financially?

22. Why doesn't the council acquire the site at its current KIBA status as pre-housing land has a lower value?

## **SITE ALLOCATION POLICY**

### **Land uses**

23. Basically, this proposal is a major policy use change to one of Lambeth's rare KIBAs and turning it into a housing development.

24. 1500 sq meters of light industrial spaces is qtr of an acre and very small – 5 such spaces will fit into a professional football pitch like Arsenal.

### **Affordable housing.**

25. What is the basis for the London Plan requiring the council to enable 1300 new homes to be built each year?

26. What is the difference between council rents, Housing Association rents, London Affordable rent, London Living rent, social rent, intermediate rent, social housing, shared ownership and affordable housing ? What % of market rents are each of these rent types? What is the Site 19 policy split between these rent types requirement within its broad definition of 50% threshold “affordable housing”?

27. What number of existing Lambeth homes are released when households move into new homes? What impact has Brexit, levelling up, climate change and broadband have on London’s demographics and future demand for housing?

28. 50% affordable means 50% of the new homes will be subsidised. Where is the subsidy coming from? What conditions come with these grants?

29. Will the affordable % be reduced to 35% when the land is acquired from the public sector by a private land owner and so ceases to be public sector land? Does the public sector ownership definition refer to the freehold owner or the leasehold owner?

30. What happens to the affordable housing % if the planning applications are not fast tracked? Planning applications for this complex type of site, with its special additional overheads, might be better assessed using the full viability process anyway.

31. What % of new affordable home will be at council rents? Which organisation would be responsible for building any homes at council rents? Will homes at council rents have to be built by Homes for Lambeth or the council itself?

32. If the policy requires 50% subsidised housing but this is not feasible then no construction will take place. (In 1991 permission was granted for 147 homes and a road overbridge to Leigham Vale – but expired.)

33. What is “fast” about Fast tracked planning applications – does it bypass community consultation, Planning Committee? Is It more speed or less cost?

34. What % of market & affordable homes will be family-sized? What policies has the council on child friendly housing? How much outdoor secure & public play space will be required?

### **Social infrastructure**

35. How many residents are the 400 or so homes expected to generate? What is the child yield of the affordable and market rate homes? How will Site 19 policy assist in meeting the requirements of UNICEF UK Child Friendly status for Lambeth?

36. Norwood Road’s local shopping street should greatly benefit from more residents.

### **Employment and skills**

37. Knollys Goods Yard has only just been designated a KIBA in the Sept 2021 Local Plan. It provides low cost industrial accommodation suitable for lower value industrial uses and other industrial related businesses important to the local economy, particularly the construction sector. There are very few locations of this size in Lambeth, or indeed in inner south London, that can accommodate this number of businesses of this type; and few locations with comparable levels of visual and noise screening from residential neighbours. The Knolly's Yard site is unique in Lambeth in this respect.

38. Why suddenly change the land use from Local Plan published 1 Sept 2021 – three months ago?

39. Current employment land use is 9,339 sq metres. How many employees can 1500 sq meters of light industrial employ?

40. How can the proposed 1,500 sq metres of work space be considered as intensification of existing 9,339 sq metres industrial use?

41. West Norwood has no adult education facilities since its Lambeth College building was closed in 1998. Might an adult education centre be part of the site?

42. What is the Low Carbon Sector and what sort of jobs will it generate? Will such jobs need stores of material or 3D printers, laser cutters and transport?

43. Why are more creative, digital & low carbon industries proposed here? What % of their staff will be working off site or from home? Will such businesses require any vehicle deliveries?

44. The more intensive the housing in Lambeth the higher the need for construction services to maintain, repair & refurbish. What discussions have taken place with the current scaffold yard businesses? Will they be invited to help construct the new infrastructure & buildings?

45. How much of the industrial use will be located on the proposed lower podium deck? Will this have any windows and natural light?

### **Building heights**

46. What makes this site suitable for tall buildings? Why has site 19 been allocated the tallest tower of all 14 sites in the SADP?

47. How are tall buildings made suitable for families with children? What kind of outdoor play space will be possible? How will the children be supervised by adults remaining in the tall building?

48. Three tower blocks between 12 and 20 storeys will transform the suburban nature of West Norwood and its surrounding neighbourhoods. And create an anomaly interrupting views across the Thames valley from the O2 Dome to Wembley.

49. This massing will very much harm the composition of local views (Evidence para 6.1) Why are only Harpenden Rd residents to have their residential & town scape views protected? (Evidence para 6.1)

50. The proposed massing at the end of Cameron Place can euphemistically said to be "providing an architectural termination" and optimistically described as "beneficial". This is already a somewhat gloomy street especially when the trees close to the railway line are in full leaf. (evidence view 7)

51. South of the South Circular road, a tall building is defined as above 25m ie 8 storeys. ALL the buildings on Site 19 , located south of the south circular, would be tall buildings.

52. The construction methods in such a small & constrained site will be problematic. What thought has gone into a safe construction process between 3 busy railway lines? Will much work have to be done at night when no trains are running?

53. Towers need deeper piling and bigger cranes. How will this heavy plant get into the site for construction and out of the site on completion?

54. The policy should include an indicative Method of Construction even at this early stage.

#### **Transport movement & public realm.**

55. As the proposed development is car free it is absolutely essential that short, easy & safe pedestrian journeys into and out of the site are top priority.

56. The main route will be via York Hill, a hill too steep for residents with mobility issues, so maintaining and improving the 315 bus route will be a requirement.

57. As the only proposed road access is from Knollys Rd there is major concern from current residents that a significant number of residents in Site 19 and their visitors will park in neighbouring streets taking up precious parking spaces. Knollys Road already has parking pressure due to its unbroken 1km length, terraces, flat conversion, flatted blocks and minimal off-street parking. There are 500 households living on Knollys Rd. The new policy to add another car free 400 homes must positively address off-site parking needs

58. Would car club vehicles be parked on the site?

59. The two bridges will be very costly. What level of grant funding is being discussed or sought to open access to the site and what sort of conditions has the grant funding?

60. The proposal is very vague about the location of new bridges which are merely sketched as dotted lines and not part of the artist impression of the overall site. The bridges seem to be one of the major constraints to the development. Previous planning applications for under bridges and over bridges have not come to anything.

61. What is the anticipated footfall over the bridges? Is this sufficient to justify the cost of construction & ongoing maintenance. Would the bridges be adopted and maintenance paid by local taxpayers? Or would the maintenance be a service charge to the occupiers of the development? How will the Agent of Change principle work regarding the bridges?

62. Improving pedestrian access from Knollys Rd to Leigham Vale is welcome if there is a genuine short cut (avoiding York Hill & Norwood Rd or Leigham Ct Rd) and safe and accessible to all.

63 Five metres clearance above the tracks is the minimum height for a bridge over the railway. The drop down from the railway to Leigham Vale is several metres. The drop down would be over land outside the site. What arrangements would be needed to permit building & maintaining structures on this land?

64. If we assume a 10 m drop from the top of the bridge and a mobility gradient of under 12:1, the ramp will have to be 120 metres long, over the length of a professional football pitch. Would a shorter stepped route also be required for fitter pedestrians? Would lifts be ruled out in practice on account of costs for the relatively low footfall eg compared with Golden Jubilee footbridge beside Hungerford bridge over the Thames?

65. Sharing bridges with cyclists and scooters complicates safety. Who will walk over quiet footbridges at night? Road bridges feel safer.
66. Only short sections of the railways are single track which presumably would be the ideal location for a shorter over or under bridge. There seems to be only one location for the new bridge between Leigham Vale & the site, which is near the now empty substation brick building on Leigham Vale.
67. Has there been a feasibility study on a new under bridge vehicle access at Leigham Vale? Is 4.3m the minimum for an under bridge for traffic? Is this too low to enable construction plant for high rises to enter the site? It would also cover a shorter distance than an over-footbridge. And may obviate the need for the raised podium base for the overall development
68. Leigham Vale might make a more practical logical road access point than the new Knollys Rd bridge. Leigham Vale's proximity to the South Circular road would reduce many journeys via York Hill.
69. This section of the policy needs to specify how the footway from Knollys Rd to Cameron Place will be improved and the Cameron Place rail bridge itself which is currently too low for refuse trucks and fire engines.
70. The new road bridge seems even more problematic. Why has the location close to the Knollys Rd- York Hill junction been chosen? What weight load will this new bridge take if it is to bring in the construction plant and materials? What angle will this road take and what sized landing plate be required inside the site? Is the location of the landing plate now in the SINC? Will the new junction with Knollys Rd require additional land, eg front gardens of existing properties? What about the loss of amenity of the properties at 176-198 Knollys Road?
71. Is the York Hill road bridge wide enough to carry in & out high rise construction plant? The York Hill bridge is too narrow to provide even a pavement on both sides. Here the carriageway narrows to 4.8metres as it crosses railway lines on the bridge. A footway less than 2m wide is on the northern side of the bridge only with no footway on the southern side. A trief kerb is installed on the northern side of the carriageway
72. This SADPD should specify improving and widening the York Hill bridge.
73. Has strengthening the Lansdowne Hill rail bridge also been considered? It is too weak for any vehicles over 7.5 tonnes ie most fire engines. If the York Hill rail bridge was compromised so would access to the proposed housing. Lansdowne Hill would be a helpful back up.
74. Alternatively, why has widening & deepening from 3.1m to 4.5m of the under bridge at Cameron Place been ruled out? Would construction plant for high rise not fit under 4.5m?
75. York Hill and Knollys Roads are both Local distributor roads and so need to be kept open and operational most of the time with clear alternatives identified in case of emergency compromises.
76. Is the opportunity to incorporate a rebuild of a new Tulse Hill train station into the proposal a missed opportunity? Built in 1868 the station is too small for 10 carriage trains and feels very unsafe at night.

### **Community safety**

77. The lack of permeability due to only 3 proposed access points to the site hemmed in by railway lines is a safety issue. Three points can easily be closed intentionally. And accidents will happen. If the main road bridge is closed how does a fire engine access the site?

78. If a train was de-railed how close to the proposed housing would it fall?
79. How safe are pedestrians & cyclists on a footbridge with a 120 metre, possibly zig zag, ramp?
80. Will the capital & maintenance costs of cctv & other security be ringfenced to the landowner or residents of the site according to the Agent of Change principle?  
Or paid for by Lambeth tax payers?

### **Neighbour relationships**

81. How is an “unacceptable impact on existing neighbours” defined? Many neighbouring residents are strongly opposed to the development on amenity grounds even at this preliminary stage.

### **Energy & Sustainability**

82. Tall towers require disproportionately large carbon costs during construction than, say, terraced mansion blocks due to the necessity of deeper foundations, fewer shared walls and ability to withstand more variable weather impacting the higher floors.
83. Would the 2- storey podium be made mainly of concrete? What would be its approx. surface area? How much heat might it retain during temperatures expected during the lifetime of these proposed structures. How might the extra heat be mitigated?
84. No mention of Passivhaus standards.
85. No mention of domestic fuel sources required. Will shared heating systems be required?

### **Access to Open Space and nature conservation**

86. What impact will the traffic-free, two-storey podium have on the living soil beneath?
87. What does biodiversity mean in a proposed site like this? Will Lambeth’s Biodiversity Strategy & Action Plan apply to Site 19?
88. What is meant by urban food growing – is it ornamental raised planters or commercially viable food supply? Where amongst the housing blocks and podium deck is any urban food growing anticipated?
89. Tree Preservation Order 205 includes many vulnerable trees – ash, elm, hawthorn. When was the TPO 025 last checked on the ground?

### **SUSTAINABILITY APPRAISAL**

90. Net zero carbon across the whole development. What does this mean? Who calculates the net-zero? Over what time period?
91. How much concrete will be required?
92. How much more costly are the new cements using graphene, recycled materials, bamboo and eco cement which absorbs CO2 as it sets over its first year? Can this policy require “green

concrete"? Are such new materials proven in UK tall buildings? Or is it unviable financially with affordable housing?

93. Has the UK appropriate building regulations for tall building that are safe and sustainable? The recommendations from the 24-storey Grenfell Fire enquiry Phase 2 are anticipated to transform building safety and thus costs for tall buildings.

**Representation submitted by Knights Hill ward councillors 22/2/22**

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