**West Norwood engagement on SADPD (Sites 18 and 19) – Autumn 2022**

These written answers were previously provided in response to queries from Cllr Meldrum and other local stakeholders during/following the Reg. 18 consultation earlier in 2022.

They have been consolidated here and grouped under key themes for ease of reference. They should help to address several of the questions that arose from the community stakeholders at the first workshop on the 20th October 2022.

**EVIDENCE ON DESIGN-LED OPTIMISATION/TALL BUILDINGS**

What is the rationale that underpins the need for the proposed tall buildings?

As set out in the introduction to the Draft SADPD and the evidence documents for each site, the guiding principle for the draft site allocations is ‘design-led optimisation of development capacity’. This is a requirement of London Plan policy – see London Plan policy D3. Local planning authorities are required to consider how best to optimise the development capacity of every site that comes forward for development.

The rationale under-pinning the parameters for height and massing in the draft allocation for Site 18 is set out in the evidence document for that site, following the principle of design-led optimisation.

Would the Council support a community led design code for site 18?

It is open to the Norwood Planning Assembly, as designated neighbourhood planning forum for the area, to bring forward a draft neighbourhood plan. Any proposed design code or other policy content for a site that is the subject of an adopted and/or emerging site allocation policy in another part of the development plan would need to be “in general conformity with, and plan positively to support” that policy – please see Planning Practice Guidance Paragraph 036 Reference ID: 41-036-20190509 <https://www.gov.uk/guidance/neighbourhood-planning--2#the-role-of-the-local-planning-authority-in-neighbourhood-planning>

The Council will be able to provide comments on the draft content of the NPA neighbourhood plan once a draft is made available. Please see the Council’s policy on advice and support for neighbourhood planning in the Council’s [Statement of Community Involvement](https://beta.lambeth.gov.uk/sites/default/files/2020-12/Statement%20of%20Community%20Involvement%20Oct%202020.pdf).

The heights are given in metres. How many metres approx to a storey? What are the proposed heights in storeys of the four tower blocks included in the plans for Site 18 and 19?

Paragraph 1.16 in the introduction to the Draft SADPD states that “References to building heights should be read in the context of the definitions in [Local Plan Policy Q26](https://beta.lambeth.gov.uk/sites/default/files/2021-09/Lambeth%20Local%20Plan%202021.pdf#page=227). Building heights are expressed in metres rather than storeys because floor to ceiling heights vary according to the use of a building. As a very approximate rule of thumb, a typical residential floor to ceiling height is in the order of 3 metres and a commercial one is between 3.5 and 4 metres.”

Given there is flexibility in the proportions of commercial and residential land uses that could potentially come forward on sites 18 and 19, it is not possible to translate the general building heights given in metres into a definitive numbers of storeys.  Hopefully people can nevertheless use the guidance above to get a sense of the approximate equivalent range in storeys.

There is general puzzlement over why these building heights are being proposed when the recent Lambeth Plan seemed to agree that tall buildings were not suited to West Norwood. Can you explain why there has been a change of approach?

There has been no change in approach.  Policy Q26 in the adopted Local Plan 2021 makes clear that additional locations appropriate for tall buildings may be identified in site allocation policies.  Please see in particular the last sentence of paragraph 10.128, which states “The council is also preparing a Site Allocations DPD which may identify sites suitable for tall building development.”  Part B of the policy itself starts with the words “Outside the locations identified in Annex 10 *or as identified in site allocations*….” (emphasis added).

**DELIVERY**

Why is the approach in the Manual for Delivery for Site 18 not being followed?

The Manual for Delivery, and other Lambeth consultations in West Norwood, have provided an extensive and valuable insight on local community aspirations and priorities, such as a desire to support the growth of the town centre and local businesses, to provide new mixed tenure housing, to improve public realm, pedestrian and cyclist permeability and public transport accessibility. This intelligence has informed the content of the Draft SADPD for both sites 18 and 19.

The approach within the Manual for Delivery 2017 for site 18 gave a very high-level, illustrative indication of the quantum of development that could potentially come forward at that time It did not include a detailed delivery plan based on a comprehensive feasibility assessment, which would have been the next step. The feasibility and viability of any development proposals that came forward following the Manual for Delivery would always have required further detailed assessment within the parameters of development plan policy.

Since 2017, economic, social and environmental circumstances have changed significantly. This means that the objectives for Site 18 need to be revisited (e.g. ‘retail-led’) and the current context for delivery of viable development needs to be taken into account.

The Manual for Delivery is not a planning policy document (as is clearly stated in that document).

What discussions have you had with landowners and site promoters on Site 18?

High level engagement has taken place with landowners and site promoters on Site 18, where it has been possible to make contact with them. The Development Programme Team has had previous commercial conversations with the owners of the Laundry site and 1-5 Waylett Place. Tentative discussions have been held with Metropolitan Thames Valley Housing about including their site as part of a wider comprehensive development of the site.

It is unclear how phasing will work on Site 18. A much clearer design and delivery framework is required.

The council will coordinate a key stakeholder group and further community engagement with this group will be undertaken about Site 18. This engagement will inform the Development Programme team’s work on feasibility and viability, which will in turn inform a delivery and phasing plan for the site and the emerging site allocation policy.

How does the Council plan to deliver development at Site 18 given the number of different ownerships? Are the Council proposing any direct intervention to assist in the comprehensive delivery of the site, given its stake in land ownership?

The Council’s role in delivery on Site 18 will depend on the outcome of the feasibility work mentioned above.

Can you clarify whether the Norwood Road frontage to Site 18 is to be demolished entirely or only parts – if so which.

This will depend on the phasing of any development proposals coming forward. The draft site allocation policy sets out the parameters for development proposals to consider, including where proposals involve the redevelopment of the Norwood Road frontage.

What discussions have you had to date with EcoWorld Ltd (EWL) on Site 19?

There has been high-level discussion on development principles for Site 19 with EWL, who are in negotiation with the landowner Network Rail to seek a development agreement. These discussions have focussed upon the viability and deliverability challenges at the site in order to broadly quantify the viability gap and therefore to inform EWL’s discussions with the GLA regarding potential grant funding to fill that gap.

To what extent have these discussions influenced the draft site allocation for Site 19?

Officers have had regard to some of the principles that have been discussed with EWL in the drafting of the Regulation 18 draft site allocation policy and supporting evidence. For example, the location of the main access points into the site, approximate arrangement of buildings on the site, the relative proportions of light industrial space and residential accommodation. It is important to note that in relation to the broad arrangement of height and massing on the site, indicated in the draft policy and evidence base, this has been derived from the design-led optimisation work undertaken by Lambeth officers.

**PARKING, SERVICING, TRANSPORT**

The site allocation for Site 18 proposes a number of through roads – will these be accessible to all vehicles. Has this been assessed in traffic impact terms?

What is the level of car parking/parking control. The scheme could have a significant detrimental effect on surrounding streets without a clear parking and movement strategy

How will delivery and servicing work – the plans show access points very close the already congested junction at Lansdowne Hill and York Hill.

Has there been any assessment of parking stress given car free but no CPZs

Please see the proposed policy wording in the Draft SADPD on transport, movement and public realm. This sets out the key considerations.

As stated, existing Local Plan and London Plan parking standards will apply, along with all other existing development plan policies on transport.

As and when specific development proposals come forward, these will undergo traffic/parking impact assessments in the normal way, having regard to all existing and emerging development plan policy.

Officers are also working through all the detailed comments received around transport and access matters and will consider whether any of the wording in the draft policy needs to be updated.

**BUSINESSES**

Will a B&Q store be retained (assuming they wish to remain beyond their lease) and will business be continuous i.e. replacement open before existing closes.

This is being considered by the Council as part of the feasibility work described above. No decision has been made yet.

How much commercial space will be provided on the sites?

This is set out in the draft site allocation policies. Both sites 18 and 19 set out a clear vision and requirement for new business space to be provided.

In the case of site 18 this would need to be flexible commercial space to accommodate town centre uses as well as workspace for other key growth sectors such as creative and digital.

In the case of site 19, this would need to be light industrial workspace that can co-exist with residential uses. There is a particular opportunity to attract low carbon businesses as well creative sector firms.

What are relocation plans for existing businesses at both sites?

This will depend on the nature and timing of any development proposals that come forward. As and when proposals emerge, these will need to consider implications for existing businesses on affected sites. The council will work as far as possible with the BID to help facilitate local and borough-wide opportunities for any business likely to be directly affected.

What compensation plans will be put in place for existing businesses, both those who will lose their premises, and for the rest of the area where commerce will be severely disrupted if these proposals go forward?

If compensation to businesses is considered necessary, this would be a matter between a tenant and their landlord, in accordance with the terms of any lease.

With regard to disruption to commerce in the area during construction, as and when development proposals come forward, the need for any local mitigation measures would be considered through the planning application process. This process would also involve partnership working between the Council and the BID to maintain effective communication and help address specific issues where possible.

**AFFORDABLE HOUSING**

Evidence base – has the masterplan submitted as part of the evidence base been subject to viability testing?

The draft site allocation policy sets out the affordable housing thresholds that will apply to the site. The normal London Plan threshold approach will apply, i.e. Fast Track Route for applications that provide a threshold level of affordable housing and meet the other relevant criteria; or Viability Tested Route for applications that do not. This is consistent with the plan-level viability assessments undertaken to the support the examination of the London Plan and Local Plan.

Does fast-tracking mean that an application bypasses PAC? And can it be turned down even if it meets pre-app advice?

No, the Fast-Track Route does not mean that an application bypasses Planning Applications Committee (PAC). All planning applications, whether they follow the Fast-Track Route or the Viability Tested Route, must be determined by the Local Planning Authority. Whether or not planning applications are referred to PAC is determined by the [PAC Terms of reference](https://moderngov.lambeth.gov.uk/mgCommitteeDetails.aspx?ID=600) .

Please see London Plan 2021 Policy H5 Threshold approach to applications plus the Mayor’s [Affordable Housing and Viability Supplementary Planning Guidance](https://www.london.gov.uk/sites/default/files/ah_viability_spg_20170816.pdf) for more information about how the Mayor’s threshold approach to affordable housing works.

Any pre-application advice provided on proposals that come forward is not binding on decision-makers.

How affordable will the affordable housing be – social rent, affordable rent or intermediate – what proportions of the total?

London Plan and Local Plan policies on affordable housing will apply to all the sites in the Draft SADPD. This includes Lambeth’s tenure-split requirement of 70% low-cost rent and 30% intermediate affordable housing. See London Plan policies H4, H5, H6 and Local Plan policy H2.

The current housing provision is 40% affordable, of which two-thirds is council housing and one third housing association rented. Will this be replaced before any calculations are made regarding the percentage of affordable housing required in any new scheme?

The current planning policy requirement for affordable housing provision in new residential development is 35% by habitable room on private sector land or 50% on public sector land.  The required tenure split of new affordable housing units is 70% low cost social rent and 30% intermediate.  This is calculated on the gross quantum of new housing proposed.  Where there is existing affordable housing on a site, [London Plan](https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.london.gov.uk%2Fsites%2Fdefault%2Ffiles%2Fthe_london_plan_2021.pdf&data=04%7C01%7CCCarpenter%40lambeth.gov.uk%7C2f637eb0fc814382c3b608d9e655eec7%7Cc4f22780485f4507af4a60a971d6f7fe%7C0%7C0%7C637794079044135664%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000&sdata=DN5iLr7%2FI6uPgVwn5TFn27Ct4MO%2BJKvQf8QPscDHFAc%3D&reserved=0) policy H8 requires this to be replaced by an equivalent amount of affordable housing floorspace; and the policy specifies how the affordable housing tenure of this replacement space will be considered.  Part E of the policy states that all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.

Is "London Affordable Rent" set at the same level as Social Rent? I understand that both come under the umbrella of "low-cost rented" accommodation. I am unclear about the difference in rent levels, as I had understood that council rents were roughly 50% of market rents while housing association rents were roughly 70% of market rents in Lambeth?

Affordable Rent and Social Rent are both forms of low-cost rented accommodation i.e. affordable housing for rent. Please see the definition of affordable housing in the glossary of the [National Planning Policy Framework](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf) (page 64).

For Social Rent, the rent is set in accordance with the Government’s national rent policy; this is also sometimes referred to as a ‘target rent’. Guideline rents are determined through the national rent regime, using a formula that takes into account incomes, variation in prices and other factors. Please see the Government’s [Policy statement on rents for social housing](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/781746/Policy_Statement.pdf) for further information.

Affordable Rent is a product introduced by the coalition government in 2011. It is subject to national rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable). Local restrictions can be applied to cap rents lower than 80 per cent. Again, there is further information in the Government’s policy statement (link in the paragraph above).

London Affordable Rent was a concept introduced by the Mayor of London Sadiq Khan as part of his Homes of Londoners Affordable Homes Programme 2016-2021. London Affordable Rent was affordable rent which Homes for Londoners stipulated, through its grant agreements under the 2016-2021 programme, must be limited to published ‘benchmarks’ based on guideline target rents for social rent. London Affordable Rent was broadly equivalent to Social Rent. Homes for Londoners has since published a new set of guidance for its new Affordable Homes Programme 2021-2026. This now focusses on Social Rent (in addition to intermediate products known as London Living Rent and Shared Ownership), and no longer refers to a separate London Affordable Rent product. For further information about the Mayor’s Homes for Londoners Affordable Homes Programmes, please see this link: <https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners-affordable-homes-programmes> .

Lambeth Council’s position on various affordable housing products is set out in the [Lambeth Tenancy Strategy and Affordable Housing Statement June 2020](https://www.lambeth.gov.uk/sites/default/files/tenancy-strategy-and-affordable-housing-statement-2020.pdf).

Could all the low-cost rented units built on site 18 be at London Affordable Rent rather than Social Rent?

The planning policy requirements for affordable housing on all development sites in Lambeth (including those that are subject to existing and emerging site allocation policies) is set out in [Lambeth Local Plan 2021](https://beta.lambeth.gov.uk/sites/default/files/2021-09/Lambeth%20Local%20Plan%202021.pdf) policy H2. The required tenure split for affordable housing provision is 70% low-cost social rent and 30% intermediate products.

The exact mix of affordable housing products that is secured on specific development sites will be determined through the planning application process, having regard to this policy and the Mayor’s threshold approach.

If the London Plan requires all development replacing existing affordable housing to include a viability assessment, does this mean that the fast-tracked route would not be open to a developer rebuilding that part of Site 18? Does that in turn mean that, in addition to replacing the affordable housing (which I calculate to be 33 units), the developer could argue that it was unviable to provide any more affordable housing on top of that? Or would they be forced to provide, say, one or two extra units?

[London Plan 2021](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf) Policy H8E states that “All development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.” This means that planning applications for sites involving existing affordable housing cannot follow the Fast-Track Route. They are required to provide at least a replacement quantum of affordable housing floorspace and should also seek to provide an uplift if viability allows. Viability information must be published alongside a planning application and will be independently tested. Please see Sections 3 and 4 of the [Lambeth Development Viability Supplementary Planning Document](https://beta.lambeth.gov.uk/sites/default/files/2021-06/pl-development-viability-spd-accessible.pdf)  for further information on this.

When was the corner of Lansdowne Hill and Norwood Road included in Site 18? My memory of the 2008 Master Plan was that it was excluded. I thought it odd at the time. Also, I don't recall 8-12 Lansdowne Hill being included. Is this a new addition to Site 18? Are the old people living in this sheltered housing scheme being specifically consulted as few if any will be accessing online information or emails?

Site 18 has a current site allocation in the adopted Lambeth Local Plan 2021.  This has been carried forward unchanged from the Lambeth Local Plan 2015.  The boundary in this adopted allocation encompasses the corner of Lansdowne Hill and Norwood Road and 8-12 Lansdowne Hill i.e. the whole street block.  Please see page 318 of the [Local Plan 2021](https://beta.lambeth.gov.uk/sites/default/files/2021-09/Lambeth%20Local%20Plan%202021.pdf). Therefore this boundary has been in place since September 2015.  The boundary of the proposed new site allocation policy for Site 18 in the Draft SADPD is the same as the current adopted boundary, so there is no change.

Metropolitan Thames Valley Housing (MTVH) own and manage the accommodation at 8-12 Lansdowne Hill.  They are fully aware of the consultation and will consider how to communicate with their tenants.  As and when any development proposals come forward for that part of Site 18, consultation with those likely to be directly affected would take place through MTVH.

Could the estimated 33 replacement affordable rent level properties be at London Affordable Rent or would the 21 replacing those which are currently council homes have to be at Social Rent levels ? What rules would apply to the 12 sheltered housing units run by a registered provider on Lansdowne Hill? Would they be replaced with units at current rent levels?

London Plan 2021 policy H8D states that “Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities”. This policy applies to all existing affordable housing, whether it is owned and managed by the Council or by another Registered Provider of affordable housing.

Would the guarantees offered to tenants on regen estates be offered automatically to tenants in the 21 council flats, or would this be for consideration at a later date?

This would be a consideration for a later date as and when development proposals come forward.

If land in public ownership is sold to a private developer, would the requirement for 50% affordable be reduced to 35% under the fast-track route - or less if the developer chose to go for a viability assessment?

No, the affordable housing threshold would not be reduced to 35% if the land is sold to a private landowner. Please see paragraphs 9 and 10 of the Mayor’s [Practice Note on the Threshold Approach to Affordable Housing on Public Land](https://www.london.gov.uk/sites/default/files/practice_note_on_threshold_approach_to_affordable_housing_on_public_land_july_2018.pdf) for an explanation of this.

In the Lambeth Plan for instance: H2 A iv - it says: '70 percent of new affordable housing units should be low cost rented homes allocated according to need in line with the council’s allocation scheme.'

Do I take that 'council's allocation scheme' means in laypersons speak - the 'housing waiting list', thereby reducing the 4000 of so families/individuals who are in need of accommodation in our area?

Yes, this means low cost rented affordable homes secured through the planning system will be allocated in accordance with the Council’s agreed housing allocation scheme for those on the housing list as set out on this page:

<https://beta.lambeth.gov.uk/housing/apply-social-housing/lambeth-housing/housing-policies-and-strategies>

Where the low cost rented homes are taken on and managed by a Registered Provider of affordable housing other than the Council (such as a housing association), the Council’s allocation scheme sets out how nominations will be made from the housing list.

**CLIMATE**

Lambeth Council have declared a Climate Emergency - what evaluation has been carried out on the environmental impact of demolishing the existing buildings?

As is made clear in the Draft SADPD, all existing London Plan and Local Plan policies and guidance will apply to development proposals coming forward on these sites, alongside the draft site allocation policies. This includes the full set of policies and guidance on climate change mitigation, including those relating to whole life-cycle carbon assessments.

**INFRASTRUCTURE**

Have you assessed the adequacy of local services given these developments will generate c. 1,000 extra people each?

The sites are expected to come forward within the 15-year plan period of the Lambeth Local Plan 2021. The level of growth anticipated in that plan is supported by an [Infrastructure Delivery Plan](https://www.lambeth.gov.uk/sites/default/files/pl_Infrastructure_Delivery_Plan_2020_0.pdf), which underwent examination as part of the evidence for the Local Plan 2021 and for the revised Community Infrastructure Levy (CIL) Charging Schedule 2022. All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure.

In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies) and the Regulation 122 tests for their use:

* + necessary to make the development acceptable in planning terms;
  + directly related to the development; and
  + fairly and reasonably related in scale and kind to the development