

West Norwood Engagement Workshop 2 DRAFT

18:00 – 21:00 Wednesday 2nd November 2022

South London Theatre, West Norwood

NB Notes below summarise what was said

Attendees

Representing Lambeth Council

- Cllr Danny Adilypour, Deputy Leader and Cabinet Member for Sustainable Growth and New Homes
- Sara Waller, Co-Strategic Director, Sustainable Growth and Opportunity
- Rob Bristow, Director: Planning, Transport and Sustainability (PTS)
- Matt Dibben, Assistant Director: Neighbourhood Regeneration and Partnerships
- Rheanne Holm, Head of Neighbourhood Regeneration
- Catherine Carpenter, Head of Policy & Placeshaping (PTS)
- Doug Black, Conservation and Urban Design Manager
- Vanessa Rodgers, Planning Policy Manager
- Victoria Hughes, Senior Planning Policy Officer
- Siddo Dwyer, Senior External Affairs and Cabinet Support Officer

Representing West Norwood Community

- Cllr Jackie Meldrum – Knight's Hill Ward
- Cllr Judith Cavanagh – West Dulwich Ward
- Jamie (Portobello Brewery)
- Kim Hart (Chair, Norwood Forum)
- Charlotte Ashworth (Station to Station BID)
- Anton Baskerville (Knollys Yard Community Group)
- Alexandra (Knollys Yard Community Group)
- Anne Crane (Chair, Norwood Action Group)
- Marian Girdler (Norwood Society)
- Sue Osborn (local resident)
- A local resident (name not recorded)
- Mark Fairhurst (local resident)
- James (local resident)
- Stephanie (local resident)
- Owner of WearAbouts (name not recorded)

Cllr Danny Adilypour (DA): Thanks for coming. Before we start, can we agree the agenda? The proposal is to first take comments on the minutes and notes circulated in advance of the meeting. Then, I propose we move onto a discussion of the pros and cons of the SADPD. Finally, it is proposed to agree the agenda for the final workshop.

-agenda agreed-

Cllr DA: Are there any matters arising from the minutes or the material provided?

Cllr Jackie Meldrum (JM): We had asked for pros and cons of an SPD as opposed to the SADPD. This has not been done.

Sara Waller (SW): We can pick up on this in the meeting.

Matt Dibben (MD): This is on the agenda. We can make some space to set out the difference between an SPD and an SADPD.

Kim Hart (KH): The pros and cons weren't as extensive as we expected. There was no mention of the opportunity to consult with the community. There was no balance between the community and council's viewpoint - it just reflects the council's viewpoint.

Cllr DA: The document was written by the council. Happy to discuss further this evening to explore community's pros and cons.

Anton Baskerville (AB): Following the end of the last meeting and the discussion with SW, we were worried about the risks and what the cons could be. Time was included as a risk - this might be a risk to the planning department but doesn't feel like a risk to the community. Speculative development was also listed as a risk – we feel speculation is already hitting the top notes. What could be worse than 24 storeys? We want to hear any further risks that haven't been included in the document

Rob Bristow (RB): There is a risk if there isn't a site-specific approach taken. Site 18 is a large site and it is a challenge for us in seeking to prevent smaller, speculative development. The benefit of the SADPD is to set out a more comprehensive approach to development, although doesn't mean the whole site in the red line boundary has to come forward. This doesn't mean that people's homes are under threat as the policy doesn't compel land to come forward. There are far greater public benefits that can accrue if landowners are required to work together and a comprehensive approach is taken. If this isn't done, we will see more of the same - small sites, valuation exercises and no affordable housing as sites are too small to deliver. We're hearing that you want to see high quality housing and affordable housing. This is easier to achieve with the site allocation policy in place.

Anne Crane (AC): What is wrong with sites like Waylett Place coming forward with 35% affordable housing?

RB: As you know, we are seeing proposals coming forward on the site that are not proposing to provide the threshold level of affordable housing.

Sue Osborn (SO): We think that the SADPD is speculative because the proposed height is taller than 6 stories and it would change the nature of the locality in a way that a speculator would.

AB: Is there a mechanism to force freeholders to follow the strategy? What is the statutory power of the SADPD?

RB: The SADPD is giving us more teeth to be able to push for a comprehensive approach. Once adopted, it will form part of the development plan so will be the first point of regard when an application comes in. We can look at whether this needs to be strengthened but it allows us to push back on sites which don't offer public benefits. This is a key risk of not having the SADPD. We think this is the opposite of speculation – it is a document open to scrutiny, public consultation and eventually an independent examination. It is also an iterative process informed by an evidence base including a Sustainability Appraisal and an Equalities Impact Assessment.

SO: Why didn't you have real upfront consultation at the beginning of the design process as set out in the Mayor's guidance? Why are we being involved now when the vision has already been set?

MD: Can we come back to this when we discuss the approach to consultation later in the meeting agenda?

A local resident (name not recorded): No, we should discuss now. There is a process and this has not been followed. Let's get it right now. The Mayor's Plan is crystal clear.

Catherine Carpenter (CC): As a point of clarification, the document you're referring to is draft guidance published in February this year. It is not part of the London Plan.

SO: Yes it's a draft but it is picking up on good practice that should be followed.

Cllr JM: I hope we come back to consultation. Picking back up on piecemeal development, what weight does the SADPD have as part of the Waylett Place application?

RB: Limited weight because the document is in the early stages and has received challenge.

AC: Has the council had discussion with other landowners? Has the council decided what they want to do? The B&Q lease doesn't end until 2035.

MD: We will come back to the development approach as we don't want to conflate this with planning policy. What might be helpful would be to differentiate between piecemeal development and what this means in terms of benefits and disbenefits. It also might be helpful for us to explain the concept of design-led optimisation set out in the London Plan.

Doug Black (DB): Offers an explanation of design-led optimisation approach to development capacity (as set out in London Plan policy D3). At Site 18, the starting point was understanding the transport and highways capacities. Lots of dead ends and the site is difficult for access/servicing. With transport planners, we looked at the optimum approach to better servicing and new routes through the site. We identified opportunities for the high street and an opportunity to provide a new public space. Once we had options for the site layout and servicing, we looked at building layout through building models and ran these through various tests. For example, we did high level daylight and sunlight testing. We also dropped a model into our 3D model of the city, VuCity which is accurate to 15cm. This allows us to look at the townscape impact.

AB: Can the model be shared?

DB: Screengrabs are in the evidence base. We also looked at strategic views from the London and Local Plan and looked at the impact on heritage assets such as Norwood Cemetery and Brockwell Park.

KH: The evidence base is laughable. Some photos/views were ghastly.

AB: How development looks from the cemetery is at the bottom of our priority list. We are more concerned about how it looks from the high street.

SO: techniques have no input unless the community are involved. The first step should be talking to the community and getting an agreement on the design parameters. You have done a huge amount of work without talking to us and understanding the context.

DB: Noted but the analysis on heritage impact and views is based on what is required in policy. We have a statutory obligation to test from heritage assets. In addition, we did do townscape views. I appreciate you think more could have been done. Perhaps we can take that away and look again but we need to strike a balance between the number of views and the technical assessments. 2 options were given for Site 18, as both are technically ways to understand the capacity. These options were informed by designers looking at the site constraints. Options were founded on proper analysis and a logical approach to optimisation process.

SW: Might be useful to discuss our duties when it comes to optimisation. DB has set out due process that will be scrutinised as the SADPD progresses. We have a planning duty to optimise development capacity to meet unmet need, such as for provide affordable housing. Can officers set out more about this. Another thing we have to take into account is viability. We have an obligation to ensure that development is deliverable.

KH: All this work is being done in secret. The Manual for Delivery was prepared with the community.

SO: How can that approach lead to a 15 storey building? £750,000 has been invested in Knowles of Norwood. Businesses give jobs to local people and they haven't been consulted.

RB: Housing targets come from London Plan – 1335 homes net each year. Our Local Plan includes a trajectory to set out how that can be met and exceeded. That brings the responsibility on us from national policy to plan positively for development. That means looking at brownfield land - cannot use other options like open space. We also have a responsibility to talk to potential developers such as Ecoworld. The council has a responsibility to look at how development can come forward in a planned and positive way. The Government have stipulated that if Local Planning Authorities can't meet their housing delivery, there are risks/sanctions. The first sanction would be an action plan and the second is to plan for more homes than the target. The third sanction is the tilted balance, where some London and Local Plan policies can potentially be set aside in order to facilitate more housing delivery. The risk of this is that we would see more speculative development coming forward. Planning Applications Committee may seek to resist large speculative development but we would be more vulnerable to appeal, where the tilted balance would be applied. This is happening in other London boroughs. The way to avoid this is through a plan-led approach. This does not mean the SADPD consulted on is the final version of the document.

AB: That is a threat we are willing to take. It is in the distant future and hypothetical. What could be worse than what is proposed?

RB: Coming back to deliverability, policies must be assessed for soundness. One of the key tests is deliverability. Land only comes forward for development if the landowner and developer sees a return. Other stakeholders also need to feed into process such as the GLA, landowners, developers, Historic England, and of course residents, but deliverability is key.

Mark Fairhurst (MF): – I hear what you're saying about the need to deliver but these sites are an 'easy fix'. There must be other sites where you can achieve your targets. Proposing housing in KIBAs could be a really creative opportunity to deliver new housing. Sites 18 and 19 a great opportunity and the SADPD includes things developer might not think about. But it's a real shame consultation was bulldozed through.

Cllr JM: 40% of authorities not meeting housing targets. So what is the threat? Council officers come and go and don't care about what happens to Norwood. Some of the ideas in the SADPD have been around for a long time so where has design led optimisation come from? If planning policy is strong

and restricts development capacity, it will devalue the land. I don't understand how viability works so we need much more consultation.

A local resident (name not recorded): We are seeing drawings for a 12 storey building. If that's not the plan, why put a drawing in?

DB: The SADPD contains policy at the end of the process. The journey we've been on assessing development capacity is evidence, but this is to help us to understand policy.

CC: Read out the following paragraph (1.3) from the introduction to the evidence base document: *"The indicative approach included in this evidence is one way to achieve design-led optimisation, assuming it is comprehensively redeveloped. The indicative approach is for testing purposes only and does not have the status of planning policy or guidance. It is not intended to be prescriptive. Applicants and their architects are expected to develop their own approaches to optimisation of capacity within the context of the parameters, constraints and opportunities set out in the site allocation policy"*.

AC: The evidence has produced a number. Is there another way of doing it? Why has it been done this way?

DB: Only to give us an indication of capacity. We looked at 2 potential layouts but we don't have the resources to explore dozens of options.

KH: You have been eloquent in expressing the evidence tonight so why didn't you speak to us at the start of the process?

James (J): You have created a model of our homes without speaking to us. We understand there are pressures on you to develop housing, but why not communicate and explore that with us? By not doing so you have created mistrust.

CC: Listening carefully, it would be useful to explain the longer term process behind the SADPD. There have been several local plans through the process and a lot of long-standing engagement about the future of West Norwood with the community over a period of years. So, we weren't starting from a position of not having an understanding of what people wanted. We had the Local Plan and the Manual for Delivery. In terms of the suggestions about alternative locations for housing in West Norwood, such as KIBAs or open space, these are debates that were played out in full during the Local Plan examination process, based on evidence. The SADPD builds on all the understanding that has existed before and the process that has existed before.

AB: You have to accept that people were not aware of the consultation

Owner of WearAbouts: I have been in WN for 30 years and I have never been consulted on anything.

CC: It is always a challenge for a Local Planning Authority to be able to access and seek the views of the widest range of people but we try as hard as we can within the resources available. We want as many people as possible to take part. We try and use many different strategies to make people aware, including working closely with our Neighbourhood Regeneration colleagues and the Council's specialist Communications team. We also ask community groups/stakeholders such as Norwood Forum and Station to Station to help disseminate information about our consultations.

AB: We need to hear that you're sorry. The council are on the defence.

Alexandra (A): I've not been consulted. It is disgraceful.

Cllr DA: The challenge is that there are two positions that could be correct. Officers have been working on WN for many years but the perception from the community is that this has come from nowhere. We do need to challenge that perception and get to a better place. This is why we are doing this process now. This process is up for review but I need to get fully informed. I can't fix everything but I am trying to get things to a better place.

SO: This borough has to grapple with changing world we're living in. We have 14 empty schools but the council does not want to handle these vacant buildings. We potentially have 14 sites available for housing.

MF: Following up on CC's points, when the Manual for Delivery was carried out, people were nervous about tall buildings in West Norwood. The Tall building policy met stiff resistance as well. There has been a pattern about the community making their views clear on heights. It could be an option to do a Plan that doesn't have such clear massing.

AB: I felt like we were reaching a consensus at the end of last meeting. We thought we were clear that we wanted the sites removed, subject to risk. I feel uncomfortable that the risk is hypothetical. Unless there is further risk that is not council led then please say now.

MD: With regard to Site 18, we intend to run a further session where we will discuss delivery and phasing. A full discussion about scale and delivery would be useful to have on site 18.

Jamie, Portobello Brewery (JPB): Discussions need to be had with the right people. We have invested a lot of money in the business and now feel uncertain. I don't feel like there's been a lot of listening from officers. There's been a lot of laptops and typing.

KH: Only a small group of stakeholders were invited to briefing on SADPD. This left us only 4 weeks to comment. We moved heaven and earth to use our own resources to get people to respond. The result was that 95% were against the council's proposals.

AC: We are aware of the resourcing issue, but if we could do it, why couldn't officers?

Cllr Judith Cavanagh (Cllr JC): I want us to move forward constructively. I am interested to hear how further consultation would look if the sites were taken out of the SADPD.

A local resident (name not recorded): Any future consultation would have to be transparent. We don't have basic information about viability or housing targets. We have been given a plan and told bad things will happen if we don't agree to it.

AB: I want clarification on risk beyond central government imposing the tilted balance.

SW: The principle of the SADPD is that this allows us to define more clearly what is appropriate on the site. Balance with other stakeholders, it allows you to define public benefits, how the site is used. If an application is submitted, we would have much a stronger ability to push back. What I haven't heard is that this is a bad idea, to have better control. If the sites come out, this opportunity is lost for a long time. There is no other mechanism that has the same weight. I feel the way we have articulated scale/massing/height is the point of concern. What we can say is that we have heard that, we have a process to follow but we can go away and look at that. That is something the decision maker has to take into account. If you ask us to take the sites out, that puts you and us in a position that is harder to manage development. In a context where it is becoming difficult to manage housing numbers, the risk is real. In terms of process going forward with these sites in the SADPD, some parameters in response to consultation can be something council looks at.

AB: That would be good. Height not just the only issue, it is also the road bridge. We are happy for any application to be judged against the Local Plan. We don't want policy direction outside of the local plan. The main driver in the Local Plan is for industrial intensification.

SW: Perhaps what we are trying to achieve through the site vision isn't clear with regards to the balance of industrial and housing on Site 19.

At this point, laptops were packed away to move rooms.

MD: The sentiment in the room that we are hearing you. My reflection so far is that on the risks of removing the sites from the SADPD, people still don't feel satisfied. We also need to discuss options for future consultation and options for height/massing.

Cllr DA: What the options are, I haven't made my mind up and haven't reached a conclusion. From the workshops, I do recognise strength of feeling. It is important to look at the risks of the pros and cons. I have to go with the least worst option. Housing targets is not an empty threat. We face a challenging few years ahead with inflation and building costs increasing. This has meant the housing pipeline isn't as big as we would like. It is not beyond the realms of possibility that we face sanctions. The ultimate sanction is no planning policy, which would mean no potential to restrict height.

AB: Our response is that the risk is a potential scenario that may not happen versus the SADPD which is a real scenario that is happening.

SW: From working with colleagues across the country, what may sound like a hypothetical situation is in fact the reality. There is the option of these sites staying in but making changes. Tonight we've explored the issues. We have followed the guidance to get to where we are. The decisions are to leave it in, take it out, or to explore what are the options in terms of scale/massing in the context of viability. It would be helpful to discuss potential changes that could be made this evening.

Charlotte Ashworth (CA): We need more consultation with businesses. We do need some kind of control over what happens in terms of the access and routes through.

SW: There is an opportunity to be prescriptive with this.

Cllr DA: From the community's perspective, the SADPD is seen as an immediate threat. However the medium and long-term challenges and threats are real. Not meeting housing targets is a genuine threat.

JPB: What is the risk to freeholders/businesses? Will they be made to sell?

SW: No, they will not be made to sell.

Stephanie (S): The starting point needs to be how to avoid piecemeal development.

SO: We would rather take the risk and remove the sites.

SW: Cllr DA has heard that but he has to balance the views of the community with those of other stakeholders. Can we have a conversation about refining the document?

S: We don't have the time to go back to square one.

Cllr JC: This question is to community. There is 8 weeks before we go to Cabinet. What would the community like to see in terms of consultation?

AB: Can the re-design of the community be done in 8 weeks? We don't want to be held responsible for Lambeth's failings. We want the sites to be taken out of the SADPD to co-design with the community.

Cllr JM: Nobody told me that we had two sites in West Norwood at the adoption of the Local Plan that would bring significant change. Why do we bother with SPDs if they have no impact?

SW: It's comparative weight.

Cllr JM: We don't want to hold up the other sites. Can we go through the process again and have a West Norwood SADPD? Sustainability should be looked at again. We have no way to communicate with Network Rail about trains.

RB: There are risks if the sites are taken out notwithstanding housing targets. The site could come forward at a greater height. Policy on Site 19 recognises permeability – if we don't have a policy, then there is no hook to get that public benefit. On sustainability, the SADPD provides greater protection for the SINC, and enables the ability to curate the industrial space that comes forward.

AB: Any site is open to these risks. We want to be open to the same rules as every other site in Lambeth.

SW: The SADPD is being funded by the GLA. The additional work would require extra funding. I have to check but legally, I believe it would be possible. However, the probability of this happening is low as our only source of funding would be the council general fund.

SO: The community are happy to do the work and don't mind the delay.

MD: it would be good to explore what is the art of the possible within the context of risks and resourcing. It would also be useful to have more of a dialogue on what would happen to businesses on Site 18.

Cllr DA: There is a distinction between Sites 18 and 19. With site 19, it is private land. Site 18 is partly owned by the council so we can look collectively at our aspirations and what we can bring forward on the site. We can also have a conversation about what happens in terms of phasing. What we are saying is that we want to use the SADPD to guide what Site 18 looks like in the future and to get to a middle ground. We can do this through workshop 3.

Rheanne Holm (RH): A slightly different approach can be taken on Site 18 as it holds some council land. We can take longer to explore and discuss the approach to Site 18 outside of the SADPD timeline as that journey moves forward. If there was consensus, we can work with our Development Programme team for many months to come.

KH: We have already got to this point through the Manual for Delivery.

SO: I was told there was no option to amend heights as otherwise, the site wouldn't be viable.

A: Where did 24 stories come from?

AB: The SADPD is being pitched to us as a protective mechanism. We don't want that protection.

Cllr DA: Your view has been heard and I recognise the challenges. I haven't made a decision but I want you to understand the risks. I am hearing what you are saying - take both out. I have to look at each site separately and consider the merits of different courses of action. For me, it would be helpful to have a conversation on Site 18 as we own the land.

S: I think if we looked at Tulse Hill as a whole then the community could provide the same number of homes with more affordable housing.

KH: Both sites are transformational for our community.

CA: Are there examples of where the tilted balance has been applied in the country, or in London?

RB: To follow up on question posed by Cllr DA, how would people like to explore questions of deliverability on site 18? The council are happy to explain deliverability, trade-offs and viability at the next workshop.

CA – I would like to see examples of tilted balance being applied so we fully understand the risk of the site.

MF: Within the timetable set, are you proposing to put forward a revision or is the discussion whether the sites should be left in or taken out?

Cllr DA: I am open to both possibilities.

MD: This is what we need to explore through a 3rd workshop.

Cllr JC: – if we do go through a 3rd workshop, can we explore options for how this would work. Can you come with models/pictures? How do you envisage the 3rd workshop? Can you give us a plan so we can provide thoughts in advance of the workshop?

RH: The next workshop will be more interactive.

S: We need to see figures on viability beforehand for us to understand what is achievable. We can't contribute meaningfully otherwise.

SW: The third workshop can have a more detailed agenda and scope and pick up on these points. We are proposing to bring expertise from outside of the council on viability. The proposal is that the workshop will focus primarily on site 18.

MD closes the meeting