

## **Site 18 - Comments on SADPD and Commonplace statements**

### **Introduction**

The proposals for Site 18 in the SADPD are a departure from an existing plan. They follow about 22 years of on-off discussion about this site between local people and council representatives, with a broad consensus that some or all of it would benefit from rebuilding.

Starting with local engagement around the UDP in 2000, continuing with the process of producing a Masterplan in 2007-8 and then the Manual for Delivery in 2017 there has been a vision for the site which included a public square, housing, workspace, greening, pedestrian access from Norwood Road and, obviously, service vehicle access.

**However, it was always envisaged that building heights would be compatible with existing heights in the town centre.** While there is a handful of buildings of up to seven storeys on the outer fringes of West Norwood, most of Norwood's buildings are of two or three storeys. There is one row of four-storey Edwardian shop fronts in the town centre, opposite the north end of Site 18, with the fourth storey windows built attractively into the roof.

It was also expected that building heights from ground up would scale up gradually across the site, climbing up towards the York Hill estate rather than blocking views from the estate's walkways, which go up to five storeys in the largest blocks, three or four in the smaller ones.

The Manual for Delivery proposed heights of four storeys fronting on to Norwood Road and illustrated what these new buildings might look like with a series of slightly taller buildings behind separated by tree-lined streets and pathways.

There was nothing in the Lambeth Plan 2021 to make local people think the council was about to depart from these policies and introduce taller building heights. It referred to housing densities needing to be "optimised", but stated that:

"Development in the area will need to be of a scale and form related and appropriate to its context with particular regard to local views and heritage assets."

It goes on to say that shopping uses will be "safeguarded and encouraged".

The SADPD, with its stated objective of finding new sites for tall buildings across the borough and intensifying development, has completely ignored the local consensus, previous masterplans and the suburban setting of West Norwood, raising heights of Norwood Road frontages to five storeys and plonking a 12-storey tower block behind them.

**Q1: So the first question is: why? Why does the council want to encourage tall buildings in West Norwood? At what point did this become part of council strategy for the south of the borough? And why is the SADPD proposing taller buildings in West Norwood than in other sites included in the document in other parts of the borough? Why not have a 12-storey building on Leigham Court Road, for instance?**

**Is a developer already talking to council officers about this site in addition to Site 19 and has that helped to shape the ideas in the SADPD?**

The Lambeth Plan policy on tall buildings is to support them "in appropriate locations". This does not seem to us an appropriate location.

## **Lack of consultation**

Our biggest criticism of the SADPD is the way in which a new vision for the area we represent, which would significantly alter the character of West Norwood and set a precedent for future development, has been offered to the public with the absolute legal minimum of consultation.

Under the council's own guidelines, there could have been engagement before the six-week statutory consultation period. This possibility seems to have been ruled out. As local councillors, we could have been told about the plans and had a chance to discuss them before they came to Cabinet. This never happened. The consequence is that the people of West Norwood who do know about the plans (which is by no means all of them) feel the council does not really want to know their opinions and is unlikely to take much notice of them.

This flies in the face of Lambeth's approach of working *with* its residents and local organisations and fully engaging them in policy development rather than talking *at* them. We would argue it also contradicts the Lambeth Plan.

Section 3 of the Lambeth Plan states that: "This vision [ie its spatial vision] will be delivered co-operatively by Lambeth Council and its partners in consultation with all stakeholders including designated neighbourhood planning forums."

A six-week consultation does not constitute co-operative delivery. Norwood Planning Assembly, while not formally established by referendum, has been operating with local support for some years and is part of the way through developing a local plan. We believe they should be fully involved in shaping the plans rather than having to share half-an-hour of questions online with other local groups.

This online meeting, held two weeks into the six-week consultation period, provided three leading West Norwood residents' groups and the BID with a slide presentation followed by questions. This is the only engagement by the council with residents on the SADPD other than an afternoon with six children and young people from a local youth club in which a consultancy asked about their ideas on the environment and play areas.

**Q2: Why has the consultation been so rushed? Why did the council not engage residents, businesses and councillors in advance of the formal consultation? And why has the council not even written to residents and businesses within Site 18 to inform them of the SADPD so that they knew about the consultation and could take part in it?**

Below, we address some of the specific issues raised in the Commonplace consultation.

## **Vision**

The vision talks of "sustainable, mixed-use development" of housing, workspace and retail/food and drink uses that "contribute to the renewal of the shopping frontage on Norwood Road", helping contribute to the aspiration of a 15-minute neighbourhood which is a goal of local people as well as borough policy.

However, it seems to ignore the sustainability and success of existing shops and cafes along Norwood Road. Although parts of the shopping frontages with flats above are **unattractive** and

run down, the actual businesses occupying them are largely thriving. They have survived a whole year of huge disruption from Thames Water works in Norwood Road during 2019, followed by the pandemic. Some feel that they have lost a certain amount of trade as parking has become more difficult in the town centre following pavement widening on the east side. But generally, shops are busy and were optimistic about the future until they heard about the SADPD.

The bulk of businesses on this stretch are small and are run by black and minority ethnic managers and proprietors and many also serve a mainly BAME clientele although they are also used by the whole community. They include a Caribbean bakery, a kebab restaurant and take-away, a Halal butchers which is also a greengrocer and general store, a Turkish café, the town centre's only school uniform shop, a newsagent and two shops selling and fixing mobile phones and other electronics.

**Q3: Under the current proposals, how would the future of these businesses be guaranteed? Would they be able to occupy new premises at the same rent levels? How would they be compensated during rebuilding? How would they be compensated if they were unable to afford the new premises? And what type of business would be likely to replace them if they were unable to return? What about applying the Affordable Work space policy here?**

**Q4: Is there a danger that successful independent businesses run by people local to South London would be replaced by chains taking profits out of the area? Would this not be less sustainable rather than more sustainable? How does it square with Lambeth's economic strategy of encouraging local business, especially BAME-run business?**

At the York Hill end, in 20th century blocks, there is a homeware store, an optician and a large and successful bar, Knowles of Norwood, housed in a former Co-op supermarket which seems quite a nice example of inter-war architecture. One of the flats above Knowles is a former home of the singer, Adele. Above the homeware store and opticians are flats that form part of the York Hill estate.

**Q5: Would there be some architectural and historic value in retaining the Co-op building within the vision? If these flats were demolished, how would people be re-housed?**

**Q6: Would new council flats replacing those in Snowe House count towards the 50% of affordable housing required by redevelopment on public land or would they be replaced in addition to the 50%?**

In between the northern and southern end of the strip are the B&Q store, now owned by Lambeth, and the petrol station. While residents value B&Q, which also brings in people from outside the area, we think most would welcome the replacement of these two premises if the new shop fronts were in keeping with the heights and design of the buildings opposite. But it is essential to build a replacement B&Q before demolishing the current building to allow for continuous trade

A public square has always been part of previous plans for the area referenced in the introduction and could improve the shopping experience while providing new space for outdoor events and stalls. But it will be important to design the square so that it provides enough space for these uses Is it going to be in the shade all winter? Will it be hot or cool in summer?

More fundamentally, we feel that the "vision" section in the SADPD lacks an actual vision of the long-term future of Norwood. If the site is not developed for 10 to 15 years, as stated, who will live here and what will their needs be in 2030-50?

**Q7: Will the need to meet carbon neutral goals in 2030 lead planning policy away from tower blocks which require very deep foundations and therefore are more polluting during their construction?**

**Q8: Where will parking be accommodated if the Waylett Place and B&Q car parks are eliminated? What is the demand for parking likely to be in an extremely hilly area in an era of electric cars, scooters and bikes, where people might be looking to use new forms of personal transport to take them down to the town centre at the base of three steep hills to the west, south and south-east? Will there be more older people or more children and what are the implications of that?**

## **Site Allocation**

### **Building heights and social housing**

Residents' main criticism of the site allocation policy in the SADPD is directed at the proposed heights of the buildings. While people appreciate the need for more social housing, there is concern that very little of the new housing will be affordable apart from the quantum needed to replace the existing council and housing association flats.

We would like to see the policy require the re-provision of the sheltered housing (as social housing for older people) as down-sizing will release family sized social housing

**Q9: A very important question is to what extent can extra social housing be guaranteed in addition to replacement of existing social housing?**

**Q10: How much social housing would be provided, if any, in addition to the replacement housing?**

**Q11: Can any follow-up document please clarify the difference between the different types of affordable housing, such as council-level rent housing, housing association rent housing and London Affordable Housing? Do all these fall into the description of 70% social rent housing required within the category of affordable housing?**

**Q12: Is there a possibility that developers on the land in private ownership would press for the viability route rather than provide 35% affordable housing? How much at council rents?**

**Q13: How much of the social housing would be family housing?**

**Q14: Would the 12-storey block proposed and the flats above shops be suitable for family housing? Where would children play? The areas which appear to be outlined for play later in the document would be in shade for much of the day as a result of being surrounded by large buildings.**

The other issue is aesthetics. It seems to us purely a matter of opinion whether a 12-storey tower block "is appropriate" next to the proposed town square, or that other building heights of over nine storeys "may be acceptable in the central part of the site", or that five storeys with two storeys set back are suitable for Norwood Road frontages and that heights across the site should be from five to seven storeys. Previous plans for the area have envisaged four-storeys on the Norwood Road frontage to match the highest buildings opposite, on the east side of the road.

**Q15: Why does the proposal push for taller buildings and why do planners think that 12 storeys is appropriate in a townscape of two-to-four storeys?**

**Q16: Would we be correct in thinking that each storey of a modern block tends to be higher than each storey in a block built in the early part of the 19<sup>th</sup> century? We are, for instance, comparing the height of the two-storey Iceland development built in the past decade with two-storey blocks next to it on Norwood Road.**

**Q17: We agree that the frontages on Norwood Road should “provide a clearly defined parapet line... to respect the context and create a balanced townscape with the Victorian frontages opposite”. But why do planners think that raising the height of frontages to five-to-seven storeys provides this balanced townscape when all previous visions for Site 18 have limited heights on frontages to four storeys (already double the height of most of the existing shops)?**

The proposal says the development should address the principles of “no harm to views affecting heritage assets” meaning, in this case, views of St Luke’s Church. In the document, after a description of various vantage points, such as views from the cemetery, it concludes there would be no such harm done. Some disagree with this conclusion. And the glaring omission is any comment on views from further up the hill, including from the York Hill Estate.

The views of St Luke’s Church from the York Hill estate walkways would already be impeded by the seven storeys allowed on the laundry site by the existing planning consent. But the heights being proposed throughout Site 18 exceed this and would certainly damage views of the church from the estate and other vantage points to the west of the site, appearing incongruous.

We would argue that the important view up Norwood Road to the church as you approach West Norwood from the north would also be spoiled by the series of high buildings climbing up the hill to the west which is proposed in the SADPD. The view would seem unbalanced between one side of the road and the other. While we find the current B&Q building and the petrol station already interfere with the sense of proportion that must once have existed, this plan would make that worse rather than improving on the view.

### Economic development

This section of the SADPD seems to misunderstand the success of West Norwood nowadays as a town centre. Compared with 2000 when the first scheme for Site 18 was laid down, the many independent shops and cafes are thriving and there are two successful larger businesses. It is important to retain the successful businesses we already have.

B&Q employs nearly 60 staff and serves as a magnet, drawing in shoppers from outside the area, and should be replaced, either with another B&Q or similar magnet retail business.

Knowles is the biggest investment in new hospitality in Site 18 in recent years. Is this important local business to be forced out?

**Q18: We do not understand the reference to wanting the development to “activate ground floor uses along Norwood Road”, as these are already activated. The only unused space is next to Knowles’ bar which Knowles intends to use, although this plan was held up by the pandemic. So what is meant by this statement?**

There also seems to be a contrast between the statement that “development should maximise local employment opportunities and help address skills deficits in the local population” and the idea that all Norwood Road frontages need to be rebuilt with the risk to local business, as outlined above.

**Q19: Why is there an emphasis on having 50% of uses as shops? West Norwood nowadays is a successful town centre partly because it is already moving post-retail with many service businesses.**

We agree with the need to capitalise on the opportunity for workspace for creative businesses to enhance the growing cluster of artists and makers in West Norwood and Tulse Hill (and we look forward to the long-awaited Norwood High St Creative Business Cluster SPD). But would the new workspace be affordable? Not all creative businesses are digital. The need among local artists and makers is for cheap workspace. We understand some of this workspace off Norwood High Street is currently being lost to redevelopment. Artists cannot afford new build unless the Affordable Workspace Policy is specifically applied – giving reduced rents for 15 years.

**Q20: How can we ensure that artists turned out of old buildings and warehousing where they paid low rents will be able to move into the new premises provided?**

We are concerned that the whole SADPD vision seems to be built on an assumption that the area does not have thriving businesses or jobs and that redevelopment would bring employment to Norwood while encouraging the growth of the creative sector when the evidence locally is that development on this scale may well kill existing businesses including artists’ studios.

#### Transport movement and public realm

To have most servicing from a road running north-south through the site seems sensible, but not if the road links Lansdowne Hill and York Hill as this would create a rat run.

**Q21: How would you control the through route to prevent rat-running? Norwood Road is usually very congested at busy times of day and people will cut through an alternative route if they can.**

#### Neighbour relationships

**Q22: How can a scheme of this bulk and height be “designed to cause no unacceptable impacts on existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise pollution”?**

The 12-storey tower would loom over the east side of York Hill estate including the exercise area.

The only way to achieve the stated aim above is to reduce building heights to a level that local people and residents on York Hill estate, Lansdowne Hill and York Hill and surrounding streets would find acceptable and involve residents as much as possible in the design of the site.

The six-week consultation period has produced over 300 comments on Commonplace, but many residents still do not know about the consultation, including those living in Snowe House and Thanet House which are part of the site.

We would strongly urge planners to extend the consultation on this site and include face to face consultation.

### Sustainability

Tall towers are not sustainable. They need more concrete and cause a higher city heat effect. How much will climate have changed in 2050?

A concrete podium as proposed in Option 1 would reduce the drainage capability of the site at a time when most local authorities are discouraging concreting. Could “green” concrete be specified for the site? Or could it be developed without the podium?

Why is there no mention of Passivhaus or district heating systems or generating electricity locally?

### Evidence

“Evidence” is something of a misnomer in our view. It says the section is intended to aid our understanding of the “design-led approach”. It says the indicative approach to massing and height “has been developed based on a detailed analysis of the site and its context with its opportunities and constraints.” But there is little analysis of the site in the report apart from a series of photographs compared with some misleading computer models to make the height of the buildings – in particular, the 12-storey tower – look less over-bearing than they would be in reality.

There are also some minor errors such as the description of Royal Circus as an “open space”, which is in fact a private garden, and a photograph of the snooker club which was in Waylett Place but has now been demolished and replaced with the modern flats shown in another photograph.

“Optimisation” seems to mean cramming in as many flats as planners feel they can get away with by building upwards to a height which would appear incongruous in West Norwood and not in keeping with the current building heights as has been Lambeth’s stated aim in the past. This is *maximising* the use of the space but is not necessarily the *optimum (ie the best)* approach. The best approach is a matter of opinion.

As expressed in the London Plan, para 3.3: “The optimum capacity for a site does not mean the maximum capacity. It may be that a lower density development ... is the optimum development for the site.” While the plan gives gypsy and traveller sites as an example, the statement is not confined to such sites.

Comprehensive development seems to mean designing it as a single scheme although elsewhere the SADPD talks about a phased approach. Local people have told us they would prefer it to be developed using a phased approach and a mix of architecture so that we are not presented with a set of uniform boxes. It needs to be and appear as town centres usually are: an evolving and varied landscape of different appearance, although we agree with maintaining key design principles, including respecting heritage assets, improving pedestrian’s experience and improving permeability to enable shops and cafes to be serviced. The phased approach will also avoid

destroying existing business and residential communities so they can move into a building completed in a previous phase

We disagree that the design principles stated in the SADPD are met by the proposals.

Pedestrians may not wish to thread their way through a labyrinth of tall buildings or along a street that would become a rat-run if traffic were allowed to drive through between Lansdowne Hill and York Hill as proposed in option 2. And it is not clear why it is felt advantageous to create a pedestrian link (which would be up steps) into the York Hill estate which is easily reached by walking up Lansdowne or York Hill. Some York Hill estate residents have told us that they do not want this link as the estate suffers from a lot of low-level crime – and experienced a recent stabbing incident – which makes it undesirable for people to get in and out too easily.

**Q23: Why has this pedestrian link been included and could we discuss removing it? And what exactly do you mean by comprehensive development? Would it not be preferable and less disruptive to the local economy to consider developing the town centre in a phased approach with a mix of architects and design styles?**

On the options, there seems little difference between them except a through-route on option 2.

However, in Option 1 you state that the street layout “allows for a variety of ground floor unit sizes with residential accommodation on podiums above”. We are opposed to the use of podiums as they cover too much ground in concrete and mean that greening has to be in pots rather than in earth.

Also, the drawings used to illustrate the options seem misleading as the buildings look lower than what is being proposed in the text.

**Q24: Could we see some more accurate drawings in which the numbers of storeys are the same as those in the text and the sizes of the proposed blocks are properly compared with surrounding buildings?**

**Q25: On the images of various views listed in the document, we would like to ask why the view of St Luke’s from York Hill estate balconies has not been included, or the view of the tower and St Luke’s from other vantage points to the west of the centre other than the top of Devane Way?**

**Q26: Could we have more accurate drawings in the images in appendix 1, since there are problems with some of them:**

Image 2 looking south down Norwood Road: here the buildings on the east side of the street have grown in height compared with the photograph, to match the higher buildings on the west in the foreground. And the more distant row replacing a Victorian terrace has shrunk in height even though the new buildings would be two-to-four storeys higher. In the second drawing, the left-hand buildings have grown even further and it’s not clear whether we are further forward or further back. There seems to be more street in the foreground, but the church has grown a little.

Either way, the modelling is misleading and cannot be relied upon.

Image 11 taken from the entrance to the cemetery is also misleading since the buildings on the left seem equal in height to those on the right. In fact, they would be one to three storeys higher.

We also disagree that there is no harm to some of the views shown, in particular:

Image 7 showing the tower intruding on the setting of listed monuments in the cemetery and

Image 9 from Norwood High Street which shows clearly just how incongruous the tower block would be in its low-rise town centre setting.

### **Our Conclusion**

There may well have been some hard work put in by individuals in the planning department, but the overall impression from the Site 18 section of the SADPD is that it has been rushed out to ensure it beats the deadline of purdah for the May 2022 elections. There are some misleading images, two options which barely differ and a focus on maximising housing without any clarity as to how much *extra* council rent housing would be gained. There is a lot of opinion presented as evidence.

The six-week consultation allowed is pitiful for such a major set of proposals. There has been no attempt to hold a public meeting or drop-in for residents as requested by councillors and the only in-person consultation directly with any of the residents was an afternoon with six young people from the Old Library Youth Centre who were asked by consultants for their ideas on space for play and recreation and how Norwood Road could be improved.

There has been no Lambeth Talk as specified in the 13 December Cabinet report. The communication has been very bland, eg Love Lambeth post has a photo of the town hall and no mention of any of the 14 sites in the SADDP.

An online meeting was held early on with representatives of four local groups (Norwood Forum, NAG, Norwood Planning Assembly and BID). After that it was assumed that these groups would do all the consultation needed within what was by then a four-week period.

Despite the minimal promotion of the consultation by the Planning Department, the two West Norwood sites have more comments on Commonplace's online consultation than all other 12 SADPD sites put together

It is inappropriate for a diverse borough like Lambeth to limit such consultation to an online process inaccessible to many residents including those with protected characteristics under Equality legislation.

According to the timetable, there is one more consultation after the responses have been considered by the planning department. But we are assured that this second consultation will focus on technical issues such as whether the scheme complies with the London Plan and will not be an opportunity for full involvement by residents in the development of these ideas.

It is not surprising that local people are angry. What they want is a chance to put forward their own alternative in a proper master-planning exercise with extensive citizen engagement. We suggest that this is what should happen, with Sites 18 and 19 pulled from the SADPD process.

**Comments submitted by Knight's Hill Councillors: Jackie Meldrum, Jane Pickard, Sonia Winifred. 22/02/2022**