

# Response to Draft Lambeth Local Plan

## Submission from Norwood Action Group

### Introduction

The remit of Norwood Action Group (NAG) is restricted to the conjoined districts of West Norwood and Tulse Hill. This submission largely relates to this area.

In 2008 there was a public consultation entitled Future Norwood Masterplan; its objective was “an aspirational document” to “form a key part of the evidence base for the emerging Local Development Framework”. This consultation committed “to guide and develop more detailed proposals”.

The consultation was considered by many to be flawed. Notwithstanding, in November 2008 the key outcomes were published in an 8 page booklet distributed to every household. It noted various matters said to attract wide support from public meetings, workshops, exhibitions and over 800 responders via questionnaire.

In March 2009 the full 134 page West Norwood Town Centre Masterplan Final Report (with 6 page summary) was submitted to Lambeth Council and was approved in July 2009. Public access was unavailable until the following year.

There were 4 stages of reporting that do not consistently reflect the consultation.

- The 8 page key outcome “Where to from here?” brochure
- The 6 page final report summary
- The 134 page final report
- The Draft Lambeth Local Plan (DLLP)

The DLLP acknowledges that it has been informed by the Master Plan and consultation as recorded at 4.1 on page 43, 11.6 on page 238 and in the Evidence Base on page 262.

NAG is concerned that the public consultation has in part been corrupted or ignored so that the wishes of residents and business people are not respected. Such instances will be referred to in the following response to the DLLP.

## **Response to DLLP *with regard to West Norwood / Tulse Hill***

An overall criticism is that there are no statistical targets or projections. The references to “intensification” are not defined. Without such data, many plans or aspirations in the DLLP lack essential context.

It is not possible to plan housing, retail, industry and infrastructure without such data.

### Page 38 – Spatial Vision

Norwood Cemetery should be included as a cultural destination as inferred at 2.40 on page 20, 11.69 on page 238, Policy PN7 on page 240 and the planned £10million investment recorded on page 296.

### Page 76 – 6.19

Change in boundary of W.Norwood town centre – this is referred to below (page 238 - 11.65).

### Page 99 – Vale Street Depot

It is considered inconceivable that this site could be converted to a 2 form entry primary school AND contain a recycling site; such mixed use would be inappropriate. In addition, the higher cemetery ground abutting to the west has hazards of seepage of contaminated water. Tanking would be required, but could never be guaranteed to totally effective and would require frequent inspection and maintenance.

There is a largely vacant site suitable for a primary school at the junction of Knight’s Hill and Chapel Road extending to Weaver Walk. Weaver House is the only building in partial use. Commercial purchase of the entire site is negotiable.

### Page 176 – 10.96

The prohibition of “tall buildings” adjacent to parks, commons and gardens is inadequate. The limit should be 2 stories with raised roof, or 3 stories with flat roof.

Page 238 – 11.65

The boundary should not be amended to remove the section of Norwood High Street south from the railway bridge. This is the most neglected section of the main thoroughfare (derelict in places) and in greatest need of regeneration. The approved Master Plan Final Report on page 35 recorded that regeneration should provide for “studios / employment space” in this location.

Page 238 – 11.66

This records “considerable road traffic congestion”. This is a generalisation that needs expansion: during peak hours there is moderate to high levels of congestion (though usually better than many other nearby locations such as Streatham High Road and Clapham High Street); at other times traffic usually flows without much hindrance. Exceptionally there can be considerable traffic congestion due to unusual factors (road-works, traffic accidents, snow, etc).

Page 238 – 11.67

It is believed in reality to be 286-362 Norwood Road. See comments associated with Policy PN7.

Page 238 – 11.68

Whilst this clause identifies these KIBA, there is silence on how these should be promoted and developed, similarly with no commitment in Policy PN7.

It is a historical disgrace that there has been negligible attention to this matter. Much of the area is under-occupied denying employment potential, local retail spend, tax and business rates income.

It is strongly asserted that clear objectives and the means of achieving them should be added to the DLLP Policy PN7.

Page 239 – 11.72

No figures have been given in the DLLP for the additional net dwellings in W.Norwood over the period of the plan so it is not possible to project the number of school places.

The 2009 Master Plan Final Report recorded 580 new dwellings over the period requiring a new 2-form entry primary school. Alternatively, we are informed by Mr Vinall (Team Leader Planning Strategy and Policy) that the 2009 SHLAA estimate for W.Norwood and Tulse Hill is 233 additional net dwellings, presumably requiring fewer school places.

Vale Street is not considered as a suitable site for schooling (as detailed earlier in this document).

Page 239 - 11.74

The W.Norwood Library and Nettlefold Hall is not a suitable location for small and medium enterprises other than linked to its core functions. A multi-screen cinema is under consideration; careful noise tests must be undertaken at an early stage to ensure that noise is not transmitted through the largely cast concrete structure so as to make it an incompatible neighbour to the library.

There are also plans for it to accommodate a Cemetery Visitor Centre, probably with fewer potential conflicts.

There is popular local support for both proposals.

Page 239 – 11.76

The West Norwood Master Plan Final Report approved by the Cabinet in part ignored the conclusions of 2008 consultation.

A major difference is that the 8 page key outcome brochure recorded:

- “People wanted to keep the size of development relatively small scale...”
- “It was widely felt any new housing needed to blend-in with the surrounding buildings...”
- “The scale of development in Norwood should be in keeping with the original low-rise scale of the area...”

NOWHERE in this document is there a reference to “intensification” or zoning for up to 6-story buildings (there are few in the area higher than 3-stories).

However the 134 page final report made considerable use of the word “intensification” (though not defined) and showed zoning for up to 6-stories for 1 mile from the South Circular to Ernest Avenue, including Knight’s Hill.

11.76 of the DLLP claims the Master Plan “reflects the aspirations of local residents and stakeholders” though in reality it is a BETRAYAL of the residents’ and stakeholders’ views established by the 2008 Lambeth promoted public consultation.

Families who have moved to W.Norwood by choice have done so because they like the area and its small town ‘feel’. If it should adopt this policy, LBL may anticipate extreme and determined opposition to the proposed scale of redevelopment at every stage of the process, should it proceed. It is strongly asserted that the general limit should be 4-stories.

Page 240 – Policy PN7

References to “taller” buildings should be deleted and replaced with “buildings of similar stature of no more than 4 stories” to accord with the 2008 public consultation.

Infrastructure needs for extensive development are substantial and cannot all be secured by planning obligations. The Master Plan Final Report on pages 92 and 93 records that there is very limited capacity in the **electricity** supply system; limited capacity in the low pressure **gas** supply; little spare capacity in the Thames Water **drainage** network.

The investment required just in these resources would be greatly in excess of the S106 revenues of £9.8million forecast on page 119 of the Master Plan Final Report, and the disruption considerable in extent and duration.

The reference to “open space and car parking appropriate to the nature and scale of development” should take into account the existing acute under-provision of both.

Page 241 – Policy PN7

(a)

At this point the Town Centre Opportunity Site is not defined but is later defined as 260-367 Norwood Road; or MDO38. MDO38 covers only the west side of Norwood Road from Landsdowne Hill to York Hill – numbers 286 to 362.

CLEARLY THIS MAJOR POINT MUST BE ESTABLISHED BEYOND DOUBT TO ENABLE RELEVANT DEBATE.

“Development will be between four and six stories” MUST be replaced with “no more than 4 stories” to accord with the 2008 public consultation. The consultation also revealed a rejection of “landmark” buildings; they would conflict with the organic growth of the last 150 years that has created the small town nature of W.Norwood and Tulse Hill. However, such development MIGHT be acceptable ONLY on the western side of the site, but only after further public consultation.

See subsequent more detailed comments referring to this site on page 245.

(b)

Similarly building should be restricted to 4 stories and lower-still overlooking the proposed Ecology Park, otherwise the Park will become a sun-less canyon, shaded between the railway embankment and high rise overlooking buildings.

Tall buildings would be in conflict with the LBL’s expressed intention 10.96 on page 176 of the DLLP.

The absence of any details of how to promote, and the means to achieve, “commercially-led regeneration” of these commercial areas makes this policy B totally vacuous. There must be a redraft to inform these matters.

(c)

The concerns of local residents, particularly on the Hainthorpe Estate, about the absence of parking (other than minimal provision for the disabled) for the new leisure centre have not been addressed.

At the 2008 consultation there was a rejection of Option 2 - rebuilding of the library, and no support for a landmark building. The claim of support in the DLLP for Option 2 can be rejected by referring to the consultation data; the consultation actually supported Option 1. The various consultation reports misrepresented the true results.

Page 242 – (d)

Similarly, the 2008 consultation *did not even offer* taller buildings for consideration at Tulse Hill. Options 1, 2 and 3 were all small scale featuring street market, studios, shops and cafes.

The consultation also revealed distaste for “gateway” developments and “landmark” buildings as being out of keeping with the small town heritage that most people value and cherish.

Consequently, policy (d) is another BETRAYAL of the 2008 public consultation.

The Tulse Hill station area would also be a very unhappy location for 6 story “intensification”, effectively being a small triangular ‘island’ bounded on 2 sides by main roads and on the third by the railway, therefore lacking an appropriate surrounding ‘human’ context for a greater number of adults and children to live in.

There is a total rejection of (d) which should be redrafted in accordance with established local wishes.

Page 243 - Diagram 8

Reinstate the southern section of Norwood High Street and the Chapel Road / Rothschild Street KIBA as part of the regeneration area.

Page 244 – Site 16

This is incorrectly defined as 260-367 Norwood Road. It is believed in reality to be 286-362 Norwood Road.

Page 245 – 260-367 Norwood Road

It is believed to be 286-362 Norwood Road.

It is unclear from this table whether the status of MDO38 has been superseded by a different status. Experience suggests that the MDO status has caused deterioration in the area due to the hiatus caused by the lack of effective promotion by LBL, and the activity of commercial interests in this vacuum.

On balance it is suggested that the MDO status should be retained, *but only if it is going to be professionally and relentlessly negotiated with ‘appropriate majors’.*

There is a body of local opinion that a larger supermarket would be unwelcome but the consultation report revealed (correctly in this case) that the majority was in favour of “a medium sized supermarket and small retail units”.

If a *medium* sized supermarket, the number of retailers that would be adversely affected would be few, and the balance of local benefit improved. In particular it is often heard in conversation (though there is no supporting statistical evidence) that a ‘high end’ store (Waitrose; M&S or similar) would be the most complementary to the area. Such a store would provide a resource not currently found anywhere nearby.

It would provide a place for the many high income households of W.Norwood and Tulse Hill to spend as well as attracting shoppers from surrounding areas.

Such would be 'an appropriate major'; negotiating with an inappropriate major could blight the town centre for decades.

There would be the potential for a major increase in local 'footfall', significant employment potential and the least impact on established small shops. With the existing offers from the main supermarket chains plus the small retailers, W.Norwood would have a particularly wide retail spectrum *and be the most effective element in regeneration*. This option would also be the most compatible with the 'small town' character of W.Norwood, enabling it to retain or even enhance its unusual and attractive character.

It would be essential that the current "anchor store" B&Q is not lost.

This perhaps is the only location in W.Norwood where up to 6 stories may be acceptable PROVIDED it is kept to the western side of the site, and the Norwood Road frontages "reflect the heights of the existing buildings".

## In Conclusion

The major deficiency of the DLLP is that there are no population targets or forecasts against which to assess the various policies. The word "intensification" is undefined and has a nebulous and therefore ominous quality.

There is a fear of losing the valued W.Norwood and Tulse Hill 'small town' feel that gives the area its distinctive quality that is so much valued by many residents and business people. With good policy, planning and implementation this could be preserved and enhanced whilst still achieving most of the objectives, including an increase in dwellings.

Consequently the DLLP must NOT be adopted as it currently exists; there are many portions that need re-drafting having been informed by this latest round of public consultation. This re-draft should also be opened for public consultation, with greater publicity and adequate time for response appropriate for a 15-20 year plan.

On behalf of Norwood Action Group, 25 April 2013