

Lambeth Council,
Planning Policy and Place Shaping,
PO Box 80771,
London,
SW2 9QQ

Wednesday, 07 August 2024

Dear Sir/ Madam,

RE: Draft Site Allocations Development Plan Document: Site 18

I am writing to comment on the site allocation proposals for Site 18 in West Norwood updating my letter of 2nd May incorporating the significance of Historic England's comments on the proposal on page 13.

I have been involved in some of the consultation process based on my experience as an architect, former co-convenor of the Norwood Planning Assembly and local resident. I am part of the West Norwood and Tulse Hill Community Stakeholder Group and wish to make it clear we are requesting the opportunity to make personal representation to the inspector as part of that group.

The site has huge potential and represents a significant opportunity to improve the built environment in this sub-urban town centre. The site is however located in an established context with historic significance it therefore requires a high degree of sensitivity in the design and planning of this new quarter. The site allocation proposes an increase in the anticipated massing of a new development to optimise delivery, to achieve this it seeks to remove reference to the importance of new development relating appropriately to the existing context, currently identified in the Local Plan. Despite the proposed amendments to the site boundary to retain existing residential property and height amendments the scale and massing of the proposal is not consistent with the NPPF policy regarding heritage, design, sustainability and local community consultation and is unsound.

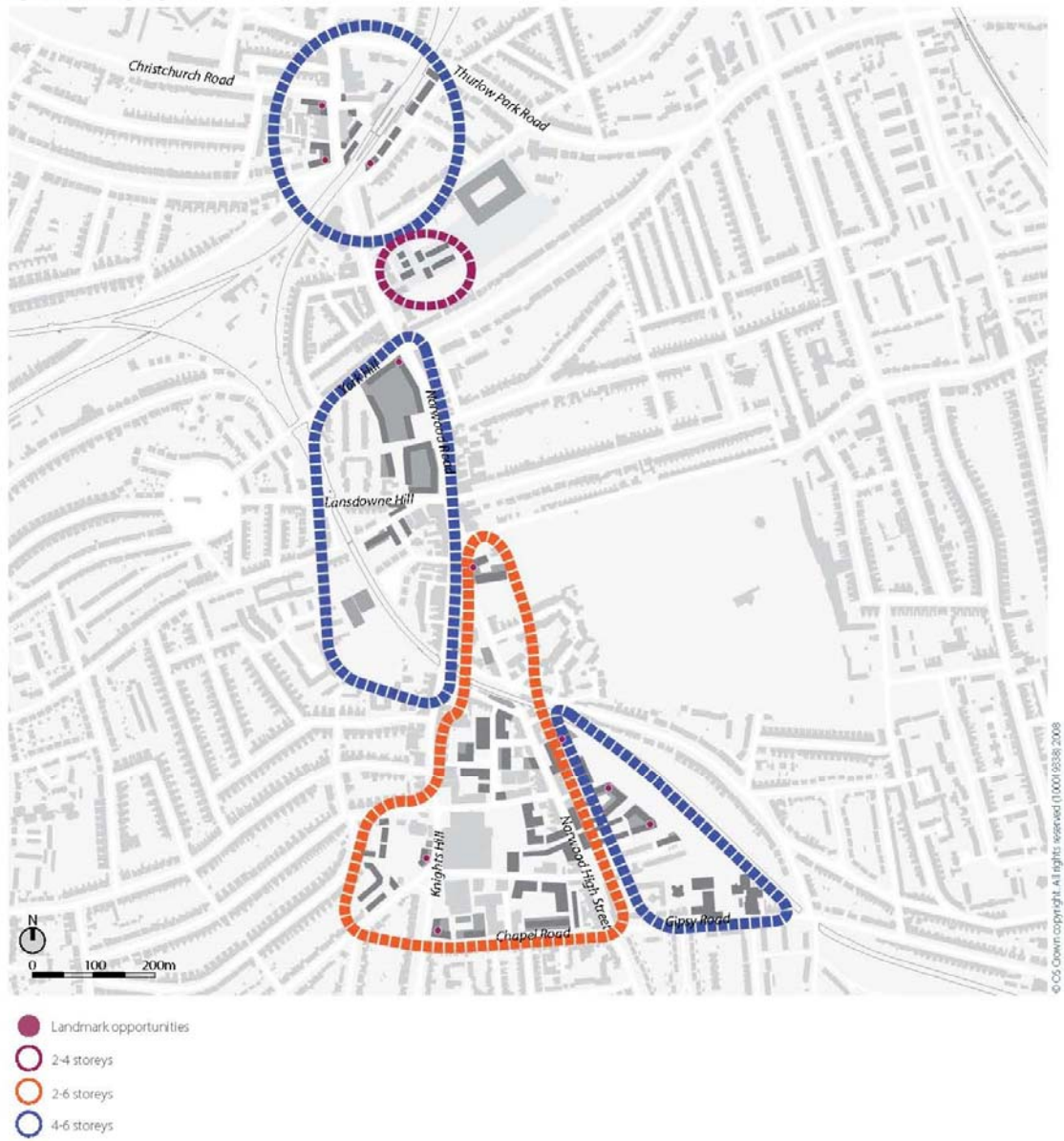
The proposals present a definitive approach for a design encouraging developers towards a particular design solution which would not be supported under current policy PN7 for the site. I strongly recommend the council reconsiders their current design approach as it appears to encourage a step backwards in design quality and aspiration for the site.

Historic Planning Context:

The following policy documents and professional planning studies have been carried out relative to the development site. These studies demonstrate a clear understanding of the community's concern and aspiration balanced with the objective of regenerating the area whilst respecting the existing context of the established Victorian architecture.

- West Norwood Town Centre Master Plan 2009: Lambeth/ EDAW
- A Plan for West Norwood and Tulse Hill: Community Evidence Base Report 2016: Lambeth/ Regeneris
- West Norwood and Tulse Hill: A Manual for Delivery 2017: Lambeth/ Regeneris
- Norwood Design Support NPA 2019: Norwood Planning Assembly/ Aecom

Figure S5 Massing diagram



West Norwood Town Centre Master Plan 2009: Lambeth/ EDAW Proposed massing 4-6 storeys for Site 18



West Norwood and Tulse Hill: A Manual for Delivery 2017: Lambeth/ Regeneris Illustrative Sketch



Figure 1 West Norwood and Tulse Hill: A Manual for Delivery 2017: Lambeth/ Regeneris Illustrative Sketch



Figure 5.23 Retail Heart: Option 3C, looking west from Norwood Road
Existing buildings shown in dark grey, new in white



Figure 5.24 Retail Heart: Option 3C looking southeast from York Hill
Existing buildings shown in dark grey, new in white



Figure 5.25 Retail Heart: Option 3C looking west from Norwood Road
Existing buildings shown in dark grey, new in white

Norwood Design Support NPA 2019: Norwood Planning Assembly/ Aecom

Current Planning Context

The current policy for Site 18 is identified in the Local Plan 2020-2025 Policy PN7, it is clearly influenced by these historic studies and includes the following design principles and key development considerations: -

The regeneration of all or part of this site provides the opportunity to provide a heart for West Norwood. The council will support development on all or part of this site that:

i. is of an appropriate scale and form that respects the rich conservation value and heritage of the town centre, taking account of factors such as building heights and the setting of

adjacent development and locally-important views;

ii. provides a finer grain development rather than a single block;

iii. addresses the opportunity to provide landmark buildings associated with this key town-centre site;

- iv. ensures heights on the Norwood Road frontage reflect the heights of the existing buildings on the eastern side of Norwood Road, avoiding a canyon effect;*
- v. provides development on the western edge of the site appropriate to reduce impact on the York Hill estate;*
- vi. improves permeability and linkages through the site including a pedestrian link through the site to improve access to the York Hill Estate;*
- vii. provides a new access to Norwood Road ensuring pedestrian priority and minimising the impact on the public realm;*
- ix. allows for improvements to Norwood Road for the widening of pavements;*
- x. includes a public space that is preferably aligned with Chatsworth Way opposite the site to provide a focal point to the town centre with sufficient space for town- centre users;*
- xi. replaces the smaller retail units on the Norwood Road frontage;*
- xii. explores the potential for a local energy network within the development.*

These principals afford a balanced set of key principles for the site's development. With the councils recent purchase of the B&Q to sit along their other sites within Site 18 the opportunity for a comprehensive development has become more achievable.

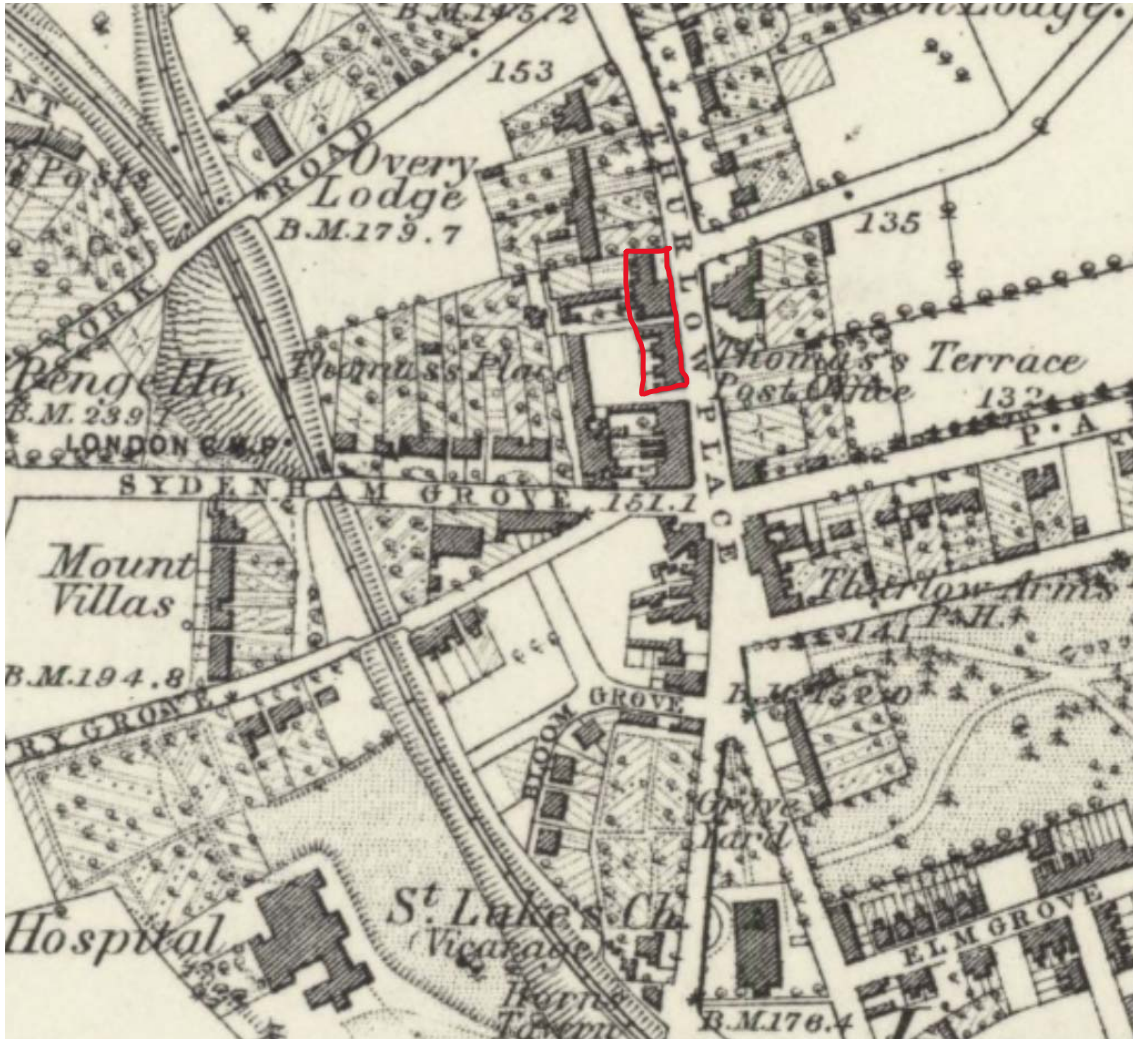
The SADPD Objectives

There is a contradiction in the process of proposing a design led optimisation of the site which is also not prescriptive. Inevitably the proposed massing and form will be considered a base line by any potential developer, it will also be difficult for the council to row back if a scheme which closely resembles their design led study is submitted even if it lacks the design quality expected for such a significant town centre regeneration as such a clear template has been presented and justified by the council. The current site policy is far more flexible and retains more control over the suitability of any new proposals brought forward. The design led study may not be included in the policy however the omission of important contextual drivers regarding scale and context will inevitably encourage more urban development out of character with the existing townscape making the goal of achieving a high quality development harder to realise and will therefore not be in accordance with NPPF Section 12 Para 135 c) which requires developments to be sympathetic to local character and history, including built environment setting.

The suggestion tall buildings will only be considered if public benefits are achieved is vague and undermines the protection of the current sub-urban character of the site by the current Local Plan Policy Q26 and consequently NPPF Section 12 Para 139 a) which states developments should reflect local design policies and government guidance on design.

Demolition of Historic Context

The indicative design proposes all buildings within the site boundary are demolished and replaced with a new development. The report considers these buildings as low to average quality however no analysis or further explanation is given and therefore is in contravention to NPPF Section 16 Para 196 which states plans should set out a positive strategy for the conservation and enjoyment of the historic environment taking into account the desirability of new development making a positive contribution to local character and distinctiveness and opportunities to draw on the contribution made by the historic environment to the character of a place.



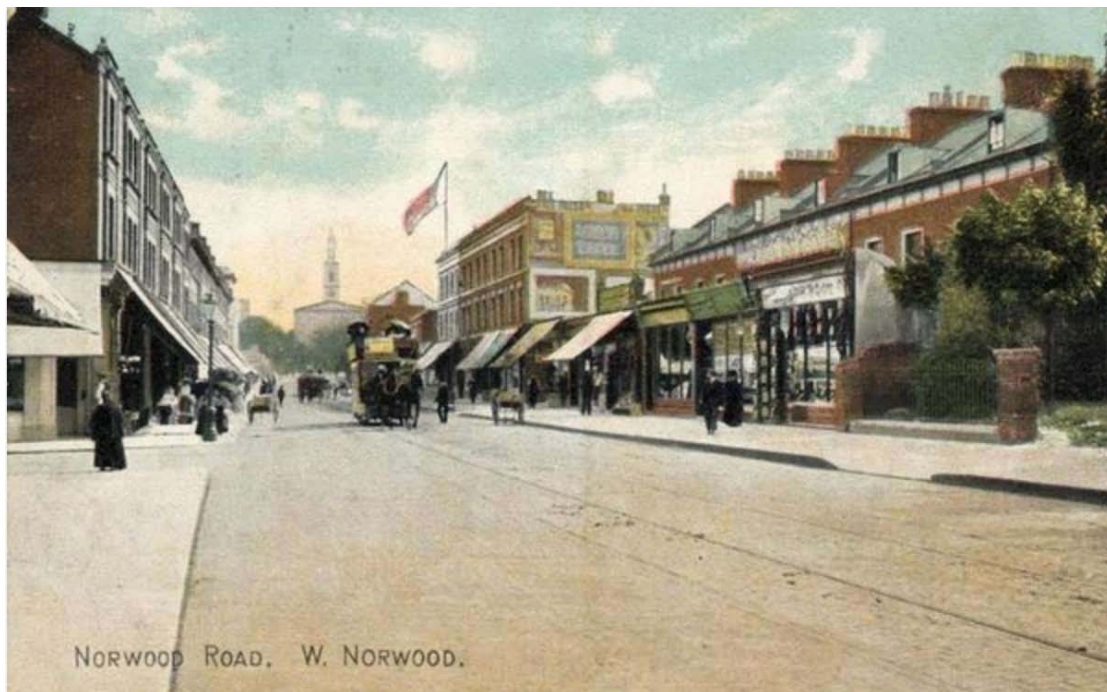
West Norwood OS Map 1870 Nos. 324-334 and 336-346 Norwood Road highlighted

Located within the development site boundary recommended for demolition are two original mid-Victorian shopping parades. Nos. 324-334 and 336-346 Norwood Road are indicated in the OS Map of 1870 Figure 9, they are clearly visible in historical photos of the area.

The historical photo from 1885 in the Lambeth archive clearly shows these two terraces relative to the view south towards St. Luke's church, as such they are the earliest commercial terraces in the town which form the setting to the main vista to the church. The importance of this view is reinforced by later photos including a similar view taken in 1906 from the London Transport Museum which shows the Victorian parade with new tram running down Norwood Road with the church behind and a later photograph from 1912 shows a similar view. This view is currently protected in the Local Plan. In light of the proposed massing which doubles the current scale of the frontage to Norwood Road the heritage importance to these historic Victorian parades should be more carefully considered before guidance is given to prospective developers of the site in accordance with NPPF Section 16 Para 198 b) which states Local planning authorities should maintain or have access to historic environment records to be used to predict the likelihood that current unidentified heritage assets, particularly sites of historic interest will be discovered in the future.



Norwood Road looking down towards St. Luke's church 1885 Lambeth Archive



Norwood Road 1906 London Transport Museum



Norwood Road c.1912 Historical Photograph

The assumption that the quality of the existing buildings on site are low to average Figure 6 in the Design Evidence is not correct. As can be seen in Figure 4 in the Design Evidence the existing Victorian parade along the site frontage with Norwood Road is an important feature of the vista of the listed St. Luke's church. It is odd that only the width of the pavement is considered when assessing the quality of the context when the historic buildings to be demolished are not mentioned.

The report identifies the heritage assets that have been considered in the design led approach, during the consultation the possibility of assessing the heritage status of the Victorian parade proposed to be demolished was raised. During the consultation meeting on 9th April the council's conservation officer confirmed that the heritage value of these buildings were not considered worthy of retention. He went on to say that these buildings could still be assessed in future on the inspector's request. These buildings had been proposed for demolition in the previous design studies however in each case the proposed massing of the replacement buildings were more closely related to the original buildings thereby maintaining the continuity of setting of the grade II listed St. Luke's church. By raising the proposed frontage to the buildings to up to 21m facing Norwood Road the new proposal highlights the impact of the loss of these terraces and harm to the setting of the listed church therefore the proposals are not in accordance with NPPF Section 16 Para. 200 which states the local planning authority should identify and assess the particular significance of any heritage asset that may be affected by a proposal including the setting.

The current condition of the two shopping parades requires attention. Nos. 336-346 Norwood Road has lost its original moulded parapet with the London roof behind now expressed with a simple brick on edge detail. Original shop windows, stall risers, signage panels brackets and awnings have been largely replaced with modern replacements in a haphazard way. However the majority of the buildings are intact with little alterations. The site allocation is an opportunity to protect these buildings, conserve and restore their fabric in conjunction with a new development, thereby protecting the setting of the listed building and respecting the established scale of the Victorian terraces on both sides of Norwood Road.

Despite the national demise of high street shopping in the UK the report highlights activity along Norwood Road, these two terraces house at least 12 established businesses, the majority independent, with a wide community representation. The continued use of these buildings over 150 year period adds to their emotional, cultural and use significance as such this aspect should also be considered in the heritage assessment of the buildings as recommended by the ICOMOS Guidelines for Educational and Training in the Conservation of Monuments, Ensembles and Sites' (1993). Therefore the proposals do not comply with NPPF Section 16 Para. 196 b) which suggests plans should set out positive strategy for the conservation and enjoyment of the historic environment taking into account the wider social, cultural economic and environmental benefits that conservation of the historic environment can bring.

With the future of these historic terraces threatened it is important the council more carefully considers the importance of these buildings by an independent Heritage Study to allow consideration for them to be made non-designated heritage assets. This group of buildings contributes greatly to the quality of the local townscape and positively to the setting of the statutory listed church, St. Luke's.

NPPF Policy Section 16 Para 206 a) states any harm to the significance of a designated heritage asset from development within its setting should require clear and convincing justification. The council have failed to convince in the Design Evidence that the harm to St. Luke's setting is acceptable and therefore the proposed demolition is not justified and unsound.

The demolition of the Victorian parades harms the setting of the heritage assets of St. Luke's, West Norwood Conservation Area and Cemetery and is therefore not in compliance with NPPF Policy Section 16 Para 212 states local planning authorities should look for opportunities within the setting of heritage assets to enhance and better reveal their significance.

London City Plan Policy HC1 Heritage conservation and growth identifies boroughs should in consultation with Historic England and other relevant organisations develop evidence that demonstrates a clear understanding of London's historic environment to be used to identify, understand, conserve, and enhance the historic environment and heritage assets. Development Plans and strategies should demonstrate a clear understanding of the historical environment and their relationship with their surroundings. The loss of the Victorian shopping parades and the proposed excessive massing to the new frontage to Norwood Road demonstrates that this policy has not been followed in the recommendations of the site allocation.

Townscape and Visual Impact Assessment (TVIA) Summary

The development is surrounded by an established range of existing buildings and designated heritage assets. To assess the impact on the designated heritage assets, local views and panoramas the council has commissioned a 3d model of the Site 18 masterplan and geolocated this on the Vu City virtual map of London. The brief assessments given in the design evidence have remained unchanged since the amendment to the site boundary and all unanimously agree no harm is inflicted on the setting or views of the heritage assets. The analysis of the view images is highly subjective, it could be argued in the majority of views that harm does occur to the designated heritage assets and the massing is inappropriate within the established sub-urban town centre due to the disparity of scale of the proposed built form and the neighbouring buildings and townscape context. By proposing such contentious massing the council will potentially negate their existing planning Lambeth Local Plan 2020 Section 10 Quality of the Built Environment Q5, 6, 7, 16, 18, 20, 21, 22, 23, 25, and 26 policies

specifically designed to protect the visual amenity of the area. The proposal therefore runs against the NPPF Policy Section 12 Para. 135 c) which requires development as sympathetic to local character and history.

TVIA IMAGE 2- Lambeth Local View – Landmark Silhouette (iii) View S along Norwood Road

The increase in mass and height on the right hand side of the view does not compromise the viewer's ability to appreciate the church. No harm to the view. No harm to the setting of the Grade II listed church. No harm to the setting of the West Norwood Conservation Area whether existing or proposed.*

The current Local Plan Policy Q25 states:

The objective in identifying these views is to ensure that no development obscures or is intrusive, unsightly, visually dominates or competes with, and no background development harms, the silhouette of the assets in:

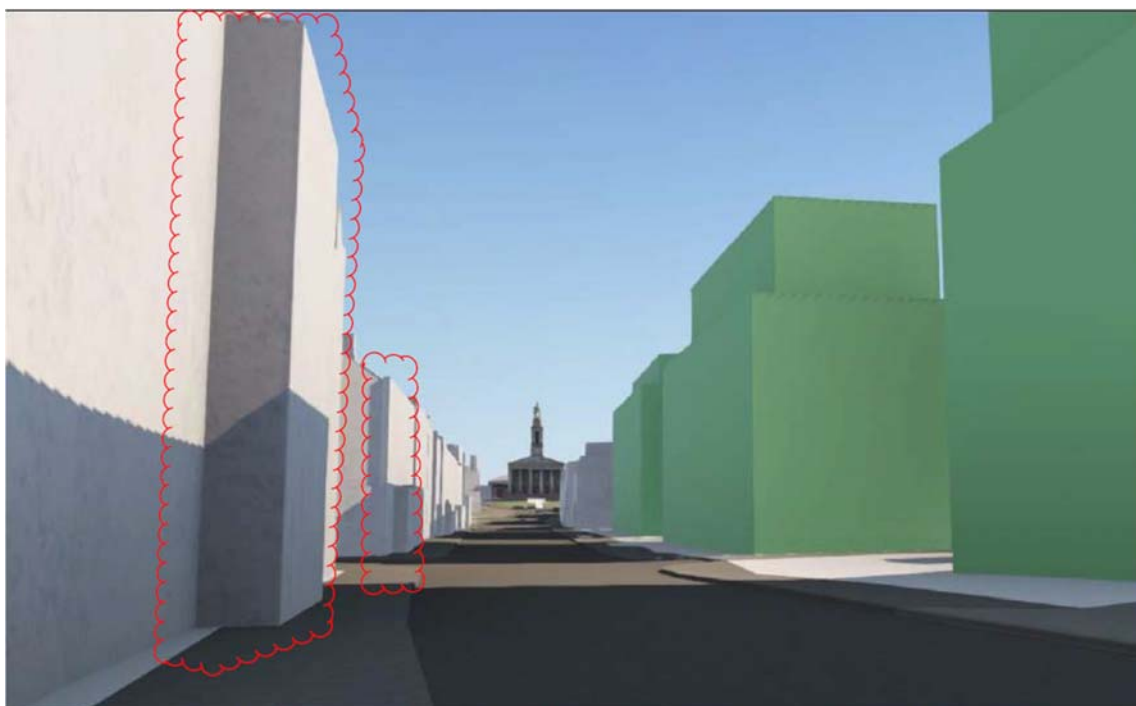
Image 2 pictures St. Lukes church and tower and is the defining image of the church as pictured in the historical photographs. The grade II listed St. Lukes, a Waterloo church, was consecrated in 1825 and is at the heart of West Norwood and located in the West Norwood Conservation Area. Unusually the church is orientated South to North due to planning restrictions which helped create the dominant viewpoint when looking south on Norwood Road. The proposed new frontage transforms this vista demolishing the 2 and 3 storey Victorian terraces and replacing these with new buildings up to 21 metres tall.

The justification for the proposed new building form relative to View 2 states:

The increase in mass and height on the right hand side of the view does not compromise the viewer's ability to appreciate the church. No harm to the view. No harm to the setting of the Grade II listed church. No harm to the setting of the West Norwood Conservation Area whether existing or proposed.*

The lack of clarification of why no harm would be afforded to the heritage assets suggest the opinion of this assessment has been severely compromised by the objective to optimise the development. The setting of the church, conservation area is clearly compromised by the loss of the contemporaneous Victorian terraces, the new massing transforms the setting by their scale over doubling the scale of the foreground buildings. Therefore the proposal fails to understand and evaluate the area's defining characteristics in contravention of NPPF Policy Section 12 Para. 132.

It should also be noted the quality of the Vu City model is poor in this view with the existing frontage facing the site along Norwood Road to the left hand side of the view incorrectly modelled giving an inaccurate representation of the massing of the existing terrace making the assessment of the proposed massing more difficult to assess.



TVIA IMAGE 2- Lambeth Local View – Landmark Silhouette (iii) View S along Norwood Road Indicating incorrect massing

TVIA IMAGE 4- Lambeth Local View – Panorama View (iv) View N from Knights Hill

Both the local view toward towards St. Luke's church and the wider panorama of the city are protected in the council's guidance although only the cone view of the church is referenced in the assessment of both options. No mention is made of the relationship between the landmark tower of St. Luke's in the middle ground and the distant tall building cluster. The panorama guidance, which is not restricted by the viewing cone states: -

'The Development between St Luke's Church and the city cluster should not diminish the viewer's ability to appreciate the contrast between the two.'

Therefore any introduction of a tall building between the two would need to be carefully assessed, this does not appear to have been the case. Section B1 Para 66 of the National Design Guide states that built form is determined by good urban design principles that combine layout, form and scale in a way that responds positively to the context. The appropriate density will result from the context. Therefore, the proposal does not comply with NPPF Section 12 Para. 133 as its height recommendations do not accord with these urban design principles relative to the existing context.

TVIA IMAGE 10 – Norwood High Street at northern end of West Norwood Library

The justification states:

The tallest element of the Indicative Approach can be seen over the rooftops. It announces the retail / commercial heart of the town centre. The rooftops of the Indicative Approach blocks fronting Norwood Road can also be glimpsed. The collective effect is neither distracting nor dominant. The careful selection of locally distinct materials should ensure that any proposal coming forward here integrates well into the townscape. No harm to the setting of the West Norwood Conservation Area or to its proposed extension. No townscape harm.

This justification is patently not accurate. The image clearly shows the negative impact of the tower which distracts from the attractive Victorian curved terrace a powerful architectural

devise which leads the eye gently down the shopping parade. The compromising of the scale of the new development and introduction of two new visual datums of the 17 -21 metre frontage building and 25 and 31 metre towers create a discordant composition. The model clearly indicates shadows cast over the curved Victorian terrace of the new building demonstrating the inappropriate overshadowing of the new development, the tallest new tower's shadow sits above reinforcing the disparity of scale of the proposed development. Any new proposal should harmonise with the existing context and not create an unbalanced vista. The National Design Guide Section B1 Para. 65 states new developments should relate well to and enhance the existing character and setting; therefore, the proposal does not comply with NPPF Section 12 Para. 133 as its height recommendations do not accord with these urban design principles relative to the existing context.

TVIA IMAGES 2-16

The view analysis for images 2-16 clearly indicate the visual impact of the 25 and 31 metre towers and 17 – 21-meter new frontage buildings to Norwood Road. It is subjective to conclude the massing is beneficial to the townscape. It can be argued the taller massing is detrimental and harmful to the setting of the heritage assets including St. Lukes Church, West Norwood Cemetery, West Norwood and Lancaster Avenue Conservation Areas. Again, the justification of the proposed massing is too heavily influenced by the optimisation of the development. Therefore the Vu City model analysis and accompanying commentary fails to understand and evaluate the areas defining characteristics in opposition to NPPF Section 12 para. 132.

Recommendations

The proposed Site 18 recommendations state: -

Topic	Recommendation
Built heritage	The settings of heritage assets should not be harmed. Especially St Luke's Church and West Norwood Cemetery.
Height	<p>The central part of the site is appropriate for a tall building of a general building height of 31m (75m AOD), set within new public space.</p> <p>Other buildings slightly exceeding the threshold definition of tall buildings in this part of the borough (25m) may be acceptable in the central part of the site.</p> <p>The rest of the site should create a coherent roofscape rising from the perimeter street frontages to a single highest point within the site.</p> <p>Provide a clearly defined parapet line to Norwood Road to respect context and create a balanced townscape with the Victorian frontage opposite.</p> <p>Provide a varied roofscape that integrates well with the locality in townscape views.</p>
Design quality	High quality design using brick (the prevailing local material) will help integration with the locality.
Connectivity	A new street network which better integrates with the wider locality and allows for in-site servicing.
Public realm	Widened footways to Norwood Road, a new public off Norwood Road present significant opportunities to improve the quality of the visitor experience to West Norwood Town Centre.
Enhanced environment	Public realm improvements and new routes present opportunities for tree lined streets and other urban greening.
Activation and natural surveillance.	Active ground floor frontages and good overlooking to all public routes and spaces.

Some of the recommended design criteria for the site are a step backwards in the aspirations for the future development from the current Local Plan Policy PN7. A number of these key principles are continued in this current iteration however there are some significant omissions which have been left unstated to allow a more intense urban development to be proposed for the site. There is no mention of an appropriate scale that takes into account the rich conservation value and heritage of the town centre or setting of adjacent development as seen in item i. Likewise, no reference is made to ensuring heights along Norwood Road frontage reflect the heights of existing buildings on the eastern side of the road to avoid the canyon effect (item iv), this is no longer deemed relevant to the sites development and would reduce the anticipated massing indicated in the design study. The requirement for the western part of the site to incorporate development appropriate to reduce impact to the York Hill Estate (item v) is omitted.

Also lost from the current site policy in the new proposal is item xii) the encouragement to explore the potential for a local energy network creating more sustainable energy use, this omission of the support for renewable forms of energy does not help shape places that contribute to radicle reductions in greenhouse gases. The demolition of the historic shopping parade is a lost opportunity to retrofit the existing buildings thereby minimising the carbon footprint of the new development thereby the proposal does not comply with NPPF Section 14 Policy 157.

The introduction of increased massing to Norwood Road and a very specific inclusion of a tall buildings to the centre of the site therefore sees a significant departure from the consensus of previous masterplans, guidance, consultation, local plan and NFFP policy.

The idea 'high quality design using brick' is an adequate guarantee of design quality is vague and gives the impression that the massing and form of the new buildings are divorced from the quality. No reference is made to the existing local character and identity of the area as highlighted in the National Design Guide Section 1 thereby not complying with NPPF Section 12 para. 133.

The proposals threaten the exclusion of existing businesses within the site. The current retail parade to the two Victorian terraces is fully let to a range of mainly independent local business that have survived the ravages of Covid and online shopping. These businesses could be supported with a masterplan to retain the special characteristics of the area, new local start up business could be encouraged with incubators offering subsidised rent. The conservation of the shopping parades could have wider social, cultural, economic and environmental benefits as highlighted in NFFP Section 16 Para. 196 b).

Consultation

During the consultation for the site allocation despite requests and promises no public events were held by the council to explain their proposals to the businesses and residents in West Norwood. A workshop event was held in February 2023 with only six participants aged 11-17 which appears lip service to the NPPF requirement Section 12 Para. 137 for the local authority to work closely with those effected by their proposals to evolve designs that take into account the views of the community. This is in stark contrast to the previous work conducted by the council which helped shape current policy. A clear preference for no tall buildings has already been demonstrated in previous studies and made obvious through comments received at consultation with the local amenity groups. Any new amendments to the policy should incorporate a requirement for developers to work closely the community.

Written comments from Historic England (ID R0654) clearly oppose the proposed amendments to the site allocation on the proposed building heights and their impact on the existing heritage assets it also claims *'The development would be an urban intrusion on what is essentially green, picturesque, contemplative part of the borough designed to have a garden*

character.' Historic England go on to recommend the important view towards St. Luke, a protected view, be referenced in the site allocation and doubts whether the building heights could be mitigated at application stage as has been suggested by the council. The council's response includes a definitive statement '*West Norwood today has an urban character.*' this is clearly at odds with the council's own description '*West Norwood developed as a commuter suburb in the mid to late 19th Century and is largely residential in character.*' (Design Evidence Local Character description p.12). The disregard of the urban historical nature which is a significant part of the context to Site 18 demonstrates a desire to fundamentally change the existing character of the town centre.

Conclusion

The evidence and recommendations proposed for Site 18 to justify the '*design-led optimisation of the site*' is a missed opportunity to ensure a new development of this scale and significance is brought forward with the correct balance between commercial opportunity, community cohesion and excellence in urban design and architecture. The proposed amendments to the site allocation policy for Site 18 do not comply with Local Plan, London Plan or NPPF Policy and are significantly criticised by Historic England and should be considered unsound. This site, located close to the historic centre of West Norwood's, is unique in the borough and should be afforded a coherent vision and approach for its future legacy.

Yours faithfully,

A handwritten signature in dark ink, appearing to read 'Mark Fairhurst', is written over a faint, light-colored circular stamp or watermark.

Mark Fairhurst

ARB, RIBA, RIBA Conservation Architect Registrant, Civic Trust Award Architectural Assessor, Former Co-Convenor Norwood Planning Assembly

cc Norwood Forum, Norwood Action Group, Norwood Society, Cllr Jackie Meldrum, Cllr Jane Pickard, Cllr Fred Cowell, Helen Hayes MP