

Lambeth Draft Site Allocations DPD

Norwood Community Groups

Topics for discussion with LBL Officers - 24 January 2022

Responses from the Council provided in red – 24 January 2022

General

- Can any presentation material please be provided in advance, we would prefer to spend the time on discussion and Q+A at the meeting?

The slides and written responses to these questions can be provided after the meeting.

- What is the programme and milestones to adoption for the Site Allocations Document?

The process is set out in the 'Timeline' tab on the Commonplace web-page and at paragraph 1.6 of the introduction to the Draft SADPD (see 'Full Introduction' page). The approximate timetable is as set out in the Council's [Local Development Scheme 2021](#) – submission by the end of the financial year 2022/23 and adoption during 2023/24.

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

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

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

- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development
- How affordable will the affordable housing be – social rent, affordable rent or intermediate – what proportions of the total?

London Plan and Local Plan policies on affordable housing will apply to all the sites in the Draft SADPD. This includes Lambeth's tenure-split requirement of

70% low-cost rent and 30% intermediate affordable housing. See London Plan policies H4, H5, H6 and Local Plan policy H2.

- What are relocation plans for existing businesses at both sites?

This is a consultation on a draft planning policy document; it is not a consultation on a specific development proposal. As and when development proposals come forward, these will need to consider implications for existing businesses on affected sites in accordance with London Plan policy E2C.

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

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

With regard to disruption to commerce in the area during construction, as and when development proposals come forward, the need for any local mitigation measures would be considered through the planning application process.

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

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

- What discussions have you had already with landowners and site promoters?

High level engagement has taken place with landowners and site promoters, where it has been possible to make contact with them in advance of the consultation. Landowners and site promoters are invited to respond to the current consultation, along with all other stakeholders.

- Have any alternative options been assessed if these sites are not able to be brought forward?

The intention is to bring forward draft site allocation policies for these sites that enable their delivery. The adopted Lambeth Local Plan 2021 sets out the locations where growth, including housing growth, is anticipated across the borough. The Local Plan 2021 plans to meet the borough-level London Plan housing target for Lambeth – the evidence for this was tested at examination and found sound.

Site 18 – Town Centre

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

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

- The masterplan proposes a number of through roads – will these be accessible to all vehicles. Has this been assessed in traffic impact terms?

Please see the proposed policy wording on transport, movement and public realm. This sets out the key considerations. As and when specific development proposals come forward, these will undergo traffic impact assessment in the normal way, having regard to all existing and emerging development plan policy.

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

Please see the proposed policy wording on transport, movement and public realm. This sets out the key considerations. As stated, existing Local Plan and London Plan parking standards will apply, along with all other existing development plan policies on transport. As and when specific development proposals come forward, these will undergo traffic/parking impact assessments in the normal way, having regard to all existing and emerging development plan policy.

If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

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

Please see the proposed policy wording on transport, movement and public realm. This sets out the key considerations. As and when specific development proposals come forward, these will undergo delivery and servicing assessments in the normal way, having regard to all existing and emerging development plan policy.

If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

- It is unclear how phasing will work – without an overarching masterplan with a clear design code/guideline, it would be easy for individual land owners to cherry pick individual components of the scheme (for example the tall building alone) without delivering the required infrastructure. A much clearer design and delivery framework is required.
- Are there any proposals or controls that can be included regarding the phasing and sequencing of the site

Please submit any comments about the proposed approach through the current consultation and they will be given full consideration.

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

The Council's Regeneration team is currently working on options for delivery of development at Site 18, taking account of the land in Council ownership.

- What is the rationale that underpins the need for the proposed tall building? It notes that this will be 12 storeys and “discrete” but it will inevitably have a visual impact.
- What is the rationale for the location for the density (up to 250 u/ha) tall building, and general approach to heights across the scheme?

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

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

If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

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

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

The Council will be able to provide comments on the draft content of the NPA neighbourhood plan once a draft is made available. Please see the Council's policy on advice and support for neighbourhood planning in the Council's [Statement of Community Involvement](#).

- Could views be provided for Site 18 in relation to York Hill, Norwood Road, views of St Lukes Church and in relation to York Hill estate and any buildings to be retained on the site.

Supporting information has been published on-line as part of the consultation material. If you wish to comment on any aspect of the draft site allocation policy and supporting evidence, please do so through the current consultation.

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

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

If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

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

This is not a matter for development plan policy. This question will be considered by the Council's regeneration team as part of their work on delivery of development at site 18.

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

Please see the proposed policy wording on transport, movement and public realm. This sets out the key considerations. As and when specific development proposals come forward, these will undergo parking assessments in the normal way, having regard to all existing and emerging development plan policy.

If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

Site 19 – Knollys Triangle

- If we are losing this as KIBA – why aren't options around consolidation of the West Norwood KIBA (in particular Chapel Road) site being considered.

It is not proposed to lose Knolly's Yard as a KIBA. The KIBA designation will remain. This KIBA is one of three identified in the Local Plan 2021 as having potential for industrial intensification and co-location with other uses such as residential. Please see paragraphs 2.22 to 2.26 in the evidence document for this site for further information.

- More detail is required to understand how site access will work – in particular vehicular and proposed overbridge that “should” be provided. Evidence appears to pay little regard to the limited capacity and complexity on York Hill – including the junction with Knollys Road and bridge. If the scheme were to proceed, then a much clearer approach to transport and access – potentially including upgrade to the York Hill bridge should be considered.

If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

- The proposal is completely out of context with the surrounding landscape and suburban character

If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

- The massing diagrams that has been undertaken shows some major impacts in terms of daylight sunlight on surrounding areas, and the proposed courtyard that looks like it would be in shadow for much of the day.

If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

- Will the podium courtyard be publicly accessible, with a through route to the new pedestrian bridge?

Yes, that is the intention – as shown on the proposed vision map for the site.

- The vision map and the masterplan shows that this pays little regard to integration with any surrounding communities, with no proposed facilities that existing residents could benefit from

The draft site allocation seeks to encourage movement into and through the site, to improve connectivity between the residential hinterland of the site and the town centre. If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

- How do you plan to ensure that development only goes ahead at Knolly's with both new bridges (or would you accept only one to start with or indeed ever?)

The draft site allocation policy states that both bridges are necessary. If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

- Can you provide drawings showing the proposed building heights in the context of Leigham Vale, Harpenden Road and Cameron Place and from Tulse Hill Station.

Supporting information has been published on-line as part of the consultation material. If you wish to comment on any aspect of the draft site allocation policy and supporting evidence, please do so through the current consultation.

- We understand that Knolly Yard is in the freehold of Network Rail. Have they been consulted on proposals, particularly relating to land needed for the vehicle bridge and to improve the existing access?

High level discussions have been held with Network Rail as landowner about the access issues associated with the site and the proposed approach in the draft site allocation policy. Network Rail have been invited to comment on the draft site allocation along with all other stakeholders.

- Have the new overbridges been costed and the impact on the viability of the development been assessed. An estimate based on the experience of members of the group is that these will total £25m upwards probably much more. It would seem doubtful that any development of this site given all the constraints and other costs could support this cost – equating to at least £50k per new home. The formal examination of the proposal prior to adoption will need to include consideration of this issue.

The significant costs likely to be associated with providing adequate access to the site are acknowledged in the evidence document for this site made available through the consultation (see the 'Planning and Emerging Context' section of that document). The detailed costs of new over-bridges and impacts on development viability would need to be assessed as part of any planning application for the site, if an applicant is not able to meet the criteria for the Fast Track Route.

If you wish to comment on this aspect of the draft site allocation policy and supporting evidence, please do so through the current consultation.

- The PTAL figures are incorrect and thus suggest a much higher public transport accessibility than in reality is the case. The high numbers also lend support to the proposed high density and tall buildings. Officers state 3, 5 and 6a. However at best only part of the site can only have the PTAL of 3 – as exists at its entrance with the rest further distant from Cameron Place having 2, 1a or b or possibly even 0. The higher levels assume that you can walk over/under the railway lines directly to Norwood Road bus stops and Tulse

Hill and West Norwood stations. It is possible to get manual calculations done to take account of barriers such as railway lines.

If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.

- Officers should also be asked to get a manual calculation assuming both new overbridges – this would actually help support the requirement for such as things stand it seems they are not need to enable public transport access given the high numbers. Of course in the absence of a costly lift (a ramp is not possible given length needed) the footbridge could only be used by those who don't need step free access – disabled, people with buggies and young children etc would have to go the long way round. I assume likewise cyclists

If you wish to comment on this aspect of the draft site allocation policy, please do so through the current consultation.