

Site Allocations Development Plan Document

Topic Paper Site 18: 300-346 Norwood Road

October 2024


Lambeth

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1. INTRODUCTION

Introduction

- 1.1. This Topic Paper provides the background to the preparation of the allocation at 300-346 Norwood Road, SE27 (Site 18) and sets out the approach taken to:
- The wider Local Plan evidence base to support the allocation of the site;
 - The site's baseline context;
 - The evolution of the allocation;
 - Feedback from engagement and consultation;
 - Consideration of the approach to key issues and opportunities; and
 - Delivery and implementation.

2. CONTEXT

Planning Policy Context

- 2.1. Planning Practice Guidance (Paragraph: 001 Reference ID: 61-001-20190315) states that Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.
- 2.2. Within this context, councils are required to identify a future supply of land which is suitable, available and achievable for housing and economic development over the plan period.
- 2.3. Site 18 is an existing site allocation in the adopted Lambeth Local Plan (LLP) named 'Site 18 – 286-362 Norwood Road SE27'. The site falls within West Norwood District Centre. The frontage on Norwood Road lies within the primary shopping area and the rear of the site is outside the primary shopping area.
- 2.4. The existing site allocation proposes retail-led mixed-use development to include housing, new public space and improved connections through the area, smaller retail units fronting Norwood Road and car parking. It notes that the regeneration of all or part of this site provides the opportunity to provide a heart for West Norwood. Development is supported on all or part of the 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;
- viii. 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.

Site Context

- 2.5. The current mix of uses on the site reflects its town centre location and comprises retail (including a B&Q store), office, industrial and residential, plus a church, petrol station and fast-food restaurants.
- 2.6. As set out in the Site Selection Paper, document EB 01, sites are proposed for allocation in the SADPD for one or more of the following reasons:
 - To set clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver.
 - To address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies.
 - To articulate the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships.

- To encourage landowners to consider the potential for optimising the development capacity of their land and help deliver key place-making objectives, where they might otherwise be uncertain about what would be supported.
 - To signal some additional sites as appropriate for tall buildings, outside the locations already identified in the LLP.
 - To enable key strategic infrastructure to come forward in a timely way.
- 2.7. For Site 18 it was considered that many of the existing criteria in the existing Local Plan site allocation (such as widening pavements) remained relevant and should be rolled forward into the new site allocation in the SADPD. The new allocation would allow for further detail to be provided about the way in which the site should be developed, particularly around design-led optimisation, in order to further enable and encourage development.

3. SUPPORTING EVIDENCE BASE

- 3.1. The SADPD is supported by a suite of evidence base documents including:
- Design Evidence Papers, documents DE01 – DE24
 - Daylight and Sunlight Assessment, document EB 04
 - Flood Risk Paper, document EB 02
 - Viability Report, document EB 05
- 3.2. These documents have informed the proposed allocation of Site 18. A summary of these documents and their conclusions is provided below.

Design Evidence

- 3.3. The proposed allocation is supported by the Design Evidence Paper for Site 18, document DE 18 and its appendix DE 18a. This evidence demonstrates the approach taken to understanding the design-led optimisation of the site to inform the content of the proposed site allocation policy.
- 3.4. The guiding approach in developing the draft site allocation policies is design-led optimisation of development capacity, as required by London Plan Policy D3. This has involved analysis of the optimum mass and height that can be achieved on each site, having regard to site-specific planning constraints such as vehicular access and servicing, and including impacts on neighbouring uses, views, townscape and heritage assets. Key spatial planning objectives have been factored in and identified for each of

the sites. This includes for example: strategic place-making and contribution to implementation of the relevant Local Plan policy for Places and Neighbourhoods; inclusion, accessibility and permeability in the public realm; healthy routes and active travel; community safety; townscape and design quality, including contribution to local distinctiveness; and urban greening.

- 3.5. The initial approach to site allocation optimisation, based on an understanding of the previous work to date, used the following parameters:
 - Permeability and movement;
 - Placemaking and public space;
 - Active frontages;
 - Enhanced public realm;
 - Site responsive use placement;
 - Sensitivity of sale/heritage and identity; and
 - Neighbour relationships
- 3.6. Layouts were based upon deliverable servicing and access arrangements. Massing options were tested in VU-city to understand likely townscape and heritage settings effects and the massing refined in response. Daylight and sunlight testing was undertaken with GIA using their 'Phoenix' model and the indicative massing refined in order to ensure no unacceptable impacts. Two 'indicative approach' options progressed into the Regulation 18 design evidence.
- 3.7. Both 'Indicative Approach 1' and 'Indicative Approach 2' placed residential street frontages to the west side of the allocation and commercial frontages to the east side (Norwood Road). The Approaches each had different road layouts towards the north of the allocation. This alignment creates differing plot sizes. Option 1 had two larger commercial footprints (with residential podiums over), and Option 2 had smaller commercial footprints in favour of residential blocks on the west side. Both options indicated the removal of the Victorian terraced properties fronting Norwood Road in order to optimise site potential.
- 3.8. After Regulation 18 it was decided to amend the site boundary to exclude housing in the northeast corner, in the southwest corner, and on the 'laundry' site which by that time had commenced construction on site. The reduced site area necessitated a revisiting of the Indicative Approach. This was followed by further VU-city program and Phoenix program testing. A model of the laundry site approval was included in tested models in both programs.

- 3.9. The reduction in the site area and the refinements to the indicative approach led to a decrease in both the commercial and residential quantum considered achievable.
- 3.10. As set out in the accompanying Design Evidence Paper, the indicative approach to massing, in combination with land use analysis, has informed the approximate land use quantum included within the site allocation policy. As the indicative approach does not include detailed floor plans or designs, a number of standard assumptions have been used to approximate the potential number of homes. For this reason, the indicative quantum stated in the site allocation is approximate and should not be read as an absolute minimum or maximum.
- 3.11. The indicative approach to layout and access, massing and general height, daylight and sunlight provides an appraisal in terms of townscape, visual impact assessment and the effect on heritage assets. This analysis has found the approach to successfully address the various opportunities and constraints identified for the site.

Daylight and Sunlight

- 3.12. The proposed allocation is supported by a Daylight Amenity report prepared by GIA, document EB 04. This was commissioned to demonstrate good design and optimisation of residential capacity, daylight and overshadowing testing on both internal amenity for future occupants and external amenity to existing neighbours in relation to the proposed site allocations, including Site 18.
- 3.13. As set out in the report, a Vertical Sky Component (VSC) facade study was completed to understand daylight potential in the existing and indicative scenarios. In line with the Building Research Establishment (BRE) Guidelines, the focus was on residential properties along with any non-domestic buildings where occupants may have a reasonable expectation for daylight.
- 3.14. A VSC facade study was also undertaken on the indicative façades, to understand the potential for the indicative scheme to provide future occupants with good levels of daylight and sunlight. In addition, an overshadowing study was also completed showing how the shadow cast by the indicative massing would affect the open spaces within and around the site. Images illustrating the results of these assessments are set out within the report.
- 3.15. GIA's façade study identified little or no change in daylight to the vast majority of neighbouring properties surrounding the site. Where change in VSC was noted, this was

minor and/or retained VSC levels were considered good and in keeping with the surrounding area.

- 3.16. It should also be noted that, while picked up by this indicative study, some of the areas shown to experience a reduction in light levels do not have residential / sensitive windows and so will not need to be assessed for daylight and sunlight. This is the case, for example, with the ground floor of the Iceland store to the south of the site.
- 3.17. As such, GIA consider the indicative massing is appropriate for its context with a view to potential impact on neighbouring daylight and sunlight amenity.
- 3.18. GIA also studied daylight amenity within the site allocation. The daylight potential for the scheme is overall very good, with only isolated areas seeing lower levels of VSC than ideal.
- 3.19. A few areas would receive lower levels of daylight so particular care should be taken when designing a scheme in detail to make sure the daylight ingress is maximised. Owing to the levels of VSC seen, maximising the fenestration should suffice to deliver accommodation that will likely meet the minimum recommendations in most instances, however single-aspect deep rooms should be avoided.
- 3.20. The few areas where enlarging the windows is not sufficient can be further mitigated by providing dual-aspect units, which will have the opportunity to benefit from generous levels of light coming from other directions.
- 3.21. It should be noted that balconies inherently restrict the access to daylight and sunlight to the windows set below them (if projecting) or behind them (if recessed). Therefore, their effects should be mitigated, where possible, providing rooms with additional windows free of obstructions, or by staggering balconies or internal layouts so that the windows serving the living areas are not overhung.
- 3.22. Finally, GIA considered overshadowing. It was concluded that there will be little overshadowing of neighbouring amenity areas, with the exception of Thanet House's rear gardens, which would see their sunlight availability noticeably reduced.
- 3.23. When looking at the sunlight availability within the proposed open spaces in the site, the main square will receive plenty of sunlight. The remaining areas would experience different levels of sunlight exposure, with one area expected to perform well, and another area likely to fall short slightly of the BRE recommendations. Its southern portion would however offer good sunlight levels and so is suitable to provide open amenity areas, if required.

- 3.24. A fourth area, conversely, would offer better levels of sunlight towards its north end, as the southern portion would be overshadowed by the massing configuration of a block to the west. Should more sunlight be sought, opening up the area to the south would help.
- 3.25. This study from GIA confirms that the indicative approach to massing shown in the design evidence is appropriate for this town centre location and that adverse impacts can be minimised or mitigated. The overall design approach is therefore considered to be sound with regard to daylight and sunlight.

Flood Risk

- 3.26. The proposed allocation is assessed as part of the Flood Risk Evidence Paper, document EB 02, which supports the SADPD.
- 3.27. This confirms the site lies within flood zone 1 and has low risk of surface water flooding. It notes that the Environment Agency flood model only shows shallow (0.00-0.15m) surface water extent within the site, however this is moving away from the roof car park of the B&Q store via the ramped surface towards Norwood Road. This will not cause a risk of flooding to the site, and any new development will be required to provide a formal drainage system that manages runoff sustainably i.e. SuDS, therefore eradicating this flow.
- 3.28. The flood risk paper confirms that the site can be considered at low risk of flooding. The overall approach is therefore considered to be sound with regard to flood risk.

Viability

- 3.29. The proposed allocation is assessed as part of the Viability Assessment prepared by BNP Paribas, document EB 05. This tests the ability of the sites in the SADPD to be developed for residential and residential-led mixed use development applying the plan policies in the London Plan, the LLP and prevailing rates of Community Infrastructure Levy (CIL), subject to indexation, in the Council's Charging Schedule.
- 3.30. The study methodology compares the residual land values generated by indicative developments on the proposed site allocations which the Council expects to come forward over the life of the SADPD. The appraisals compare the residual land values (RLV) generated by those developments to the sites' benchmark land values (BLV) to reflect the existing value of land prior to redevelopment. The appraisals reflect development plan policy requirements and CIL.

- 3.31. The study utilises the residual land value method of calculating the value of each indicative development. The residual land values have been established using Argus Developer which is development appraisal software widely used by developers, valuers and local planning authorities.
- 3.32. The Assessment was carried out when housing and commercial property markets were inherently cyclical and at a time when both commercial and residential markets have experienced a period of growth.
- 3.33. The gross areas and massing for the site allocations were informed by studies undertaken by GIA Surveyors, while the indicative schemes reflected LLP and SADPD policies on heights and mix of uses.
- 3.34. The results of the appraisals in the assessment indicate that most of the site allocations in the SADPD are either viable or on the margins of viability. Details relating to Site 18 are set out in the table below.

Table 1. Summary of appraisal results (policy compliant level of affordable housing; 10% of office floorspace provided as affordable at a 50% discount to market rent)

Site No.	No. of units	RLV £m	BLV £	Surplus / (Deficit)
18	170	£5.80 m	£51.96 m	(£46.16 m)

- 3.35. The assessment shows that Site 18 generates a relatively low residual land value (£5.80 million) which is significantly lower than the site's benchmark land value of £51.96 million. This site contains an extensive number of properties, including residential units. Given the low value generated in relation to the benchmark land value, this scheme would require significant growth in values to become viable.
- 3.36. It is acknowledged that comprehensive redevelopment of the site is not possible under current market conditions. However, the site may become more viable as a result of changes in values and costs; availability of grant funding; changes to the assumed tenure mix or percentage of affordable housing. As set out in the viability assessment, any changes to affordable housing or affordable workspace would need to be agreed through a planning application that takes the viability tested route.
- 3.37. While comprehensive development of the site is not possible under current market conditions, this is not required by the site allocation policy. The policy specifically acknowledges that, given the multiple land ownerships within the site, any development is likely to come forward in phases. Some parts of the allocated site may not come forward for redevelopment within the lifetime of the SADPD, which is 2020-2035. The

site allocation policy does not require all parts of the site to be redeveloped. Instead, the site boundary has been drawn to allow for the possibility that proposals for redevelopment could come forward on any part of the allocated area. The policy sets the parameters within which development proposals within the site allocation boundary should be considered, alongside the rest of the development plan. In light of this, and the various factors that may make development more viable in the future, the site allocation overall is considered to be sound with regard to development viability.

4. EVOLUTION OF THE SITE ALLOCATION

Regulation 18 Consultation

- 4.1. Consultation took place on the draft SADPD between 10 January and 22 February 2022, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012:
- 4.2. The draft SADPD was accompanied by a Sustainability Appraisal (SustA), Habitats Regulation Assessment (HRA), Flood Risk Evidence and Design Evidence Papers. For Site 18 the Design Evidence paper, document DE 18, provided further details on the design approach which was informed by the site's constraints.
- 4.3. Over the course of the Regulation 18 consultation, 3,308 representations were received in total. The Regulation 18 Consultation Statement, document SUP 13, provides a detailed summary of the consultation process.
- 4.4. A total of 1,317 respondents commented on Site 18. Of these who responded: 2% were in broad overall support of the approach; <1% were neutral to the approach; 3% provided a mix of responses; and 94% objected to one or more aspect of the approach. Details of the matters which received support and which generated objections are shown in detail in the Regulation 18 Consultation Statement.
- 4.5. Key issues raised in support of this site allocation included:
 - General support for the site allocation, including improvements to the town centre, public realm, transport and sustainability in general.
 - Support for the provision of new housing, including affordable housing.
- 4.6. Key issues raised in objection to this site allocation included:
 - Lack of consultation and engagement.
 - Negative impact on local character, views, heritage, businesses, community and infrastructure.
 - Negative impact on neighbours.

- Overdevelopment and concern about tall buildings.
- Inadequate affordable housing provision.
- Loss of existing housing and shops.

Changes made in response to Regulation 18 consultation

- 4.7. Following a review of representations received and ahead of Regulation 19 consultation, various changes were made to the site allocation. These are summarised below.
- 4.8. The site boundary was amended to reduce the scale of the site allocation. Areas of existing housing at the northeastern and southwestern corners of the site were removed. An area of relatively new development around the Iceland store at the southern end of the site was also removed, as was the 'laundry' site on which construction had commenced since the Regulation 18 plan was published. These changes were in acknowledgement that these areas were unlikely to come forward for development within the plan period and were not required in order to deliver the site allocation as a whole.
- 4.9. In consequence of the reduction in site area there was a reduction in the number of homes proposed. The overall number decreased from 390-470 homes to 150-170 homes.
- 4.10. In consequence of the reduced site area, the quantum of commercial / community floorspace including light industrial workspace was similarly reduced. The original figure of 5,000-7,000 sqm was reduced to 3,000-4,000 sqm to include at least 1,123 sqm GIA light industrial workspace. The requirement for light industrial floorspace to be included was to ensure compliance with London Plan Policies E2 and E7 and LLP Policy ED4 which, together, require no net loss of existing industrial floorspace capacity.
- 4.11. Additional wording was proposed to clarify that a tall building will only be considered appropriate on the site if certain conditions are met e.g. public benefits are achieved.
- 4.12. There were no significant changes to the other development principles in the site allocation.
- 4.13. Details of all changes were included in the Regulation 19 SADPD consultation, as discussed below.

Regulation 19 Consultation

- 4.14. Consultation on the SADPD Proposed Submission Version (PSV) took place between 8 March and 3 May 2024 and a second stage was undertaken between 18 June and 13 August 2024.
- 4.15. Over the course of the Regulation 19 consultation, 323 representations were received in total. The Regulation 22 Consultation Statement, document SD 10, provides a detailed summary of the consultation process
- 4.16. A total of 72 respondents commented on Site 18. Details of the matters which received support and which generated objections are shown in detail in the Regulation 22 Consultation Statement.
- 4.17. Key issues raised in support of this site allocation included:
- General support for redevelopment.
 - Support for the provision of new housing, including affordable housing.
 - Support for redevelopment of derelict sites.
- 4.18. Key issues raised in objection to this site allocation included:
- Lack of consultation and engagement.
 - Loss of historic and new buildings.
 - Inappropriate scale and massing.
 - Development would be unviable.
 - Opposition to the provision of affordable housing.
 - Negative impact on heritage, businesses and infrastructure.
 - Negative impact on neighbours.
 - Loss of existing housing and shops.
- 4.19. It is considered that the proposed allocation for Site 18 is appropriate given the above considerations. The vision to deliver a sustainable, mixed-use redevelopment to include new housing and affordable housing (approx. 150-170 (gross) self-contained homes), and 3,000–4,000 sqm GIA of commercial / community floorspace, to include at least 1,123 sqm GIA light industrial workspace and shops and food and drink uses will contribute to the renewal of the shopping frontage on Norwood Road.
- 4.20. This will contribute to the 'fifteen-minute neighbourhood' this area provides for the local community. The public realm around and within the site will be improved by increasing pedestrian and cycle permeability, through urban greening and by providing a new built frontage on Norwood Road that creates a more generous footway. Development of high

architectural quality and detailing will enhance the overall appearance of the town centre.

5. CONCLUSION

- 5.1. This paper has demonstrated that the site allocation proposed for Site 18 is an appropriate strategy for the site that is supported by evidence. The site is likely to come forward in phases, which is anticipated by the policy. The Lambeth Housing Trajectory, which forms part of the council's Housing Development Pipeline Report, is in the process of being updated. This update will include evidence concerning the expected timescale for delivery of the SADPD site allocations. An updated schedule of expected delivery timescales for the SADPD site allocations will be presented for examination when this information is available. Some modifications to the Site Allocations showing delivery timescales will need to be made as a result of this update.
- 5.2. Delivery of Site 18 will be monitored through the council's annual Authority Monitoring Report.