

From: [JR Andrew](#)
To: [Local Plan](#)
Subject: Comments on proposed submission version of draft Lambeth Local Plan, January 2020
Date: 12 March 2020 18:05:25

Dear Lambeth,

Please acknowledge receipt of this email.

It is understood that the scope for representations at Regulation 19 pre-submission publication is limited to the legal compliance and soundness of the draft plan.

The following matters constitute the collective submission of five local groups representing West Norwood, Tulse Hill and Upper Norwood:

- Norwood Action Group
- Norwood Forum
- Norwood Planning Assembly
- Station to Station (West Norwood Business Improvement District)
- Crystal Palace & Upper Norwood Neighbourhood Forum

Regarding legal compliance with The London Plan, Intend to Publish Version, December 2019

At LLP Policy EN7 a) it states “*in accordance with London Plan Policies SI 7, SI 8 and SI 9...*” yet what follows in EN7 is not wholly in accordance:

1. TLP requires surplus safeguarded waste capacity to be offered to other boroughs (TLP page 422, 9.8.6). LLP has no such safeguard, so is failing in this aspect of London Plan waste capacity safeguarding measures.

2. LLP requires compensatory capacity for lost safeguarded sites to be elsewhere in the borough (LLP page 250, EN7 a) iii), and page 252 note 9.67). TLP requires compensatory capacity to be within London i.e. not restricted to the same borough as the loss (TLP page 426, SI 9 C, and note 9.9.2 on the same page). Whilst Lambeth may incentivise retention within the borough, it is exceeding its powers to disallow compensatory capacity to be in other London boroughs.

3. LLP is silent on the matter of release of waste sites or future waste management capacity may only be part of a plan-led process and not ad-hoc (TLP page 426, Policy SI 9 note 9.9.2).

The following are omissions or factual errors concerning West Norwood/Tulse Hill

Page 424

11.94 ‘Cemetery’ missing at end of first sentence.

11.97 Lambeth sponsored Norwood Forum should be added.

Page 425

11.100 Incorrectly refers to West Norwood Lawn Tennis Club; it was West Norwood Tennis & Squash Club.

Page 429

The boundary shown for Site 18 is out-of-date and therefore incorrect (south-east corner is now occluded).

The primary shopping boundary adjacent to/within Site 18 is incorrect.

Page 433

The site boundary is out-of-date and therefore incorrect.

434

Largely nonsense; it has not been updated in-line with historic events or policy evolution.

Examples:

- There hasn’t been a laundry current for more than 10 years

- It states that there are no heritage assets close to the site; a conservation area is close-by
- Its states there have been no recent planning applications; in 2019 one was refused at PAC (now at appeal) and another approved at PAC (awaiting issue of approval).
- The preferred use does not reflect preceding para 11.103, page 426.

Yours sincerely,
Rob Andrew