



13 March 2020

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Dear Sir/Madam

**TONGE HOUSE, ROYAL CIRCUS, WEST NORWOOD, SE27 0BL
THE DRAFT REVISED LAMBETH LOCAL PLAN PROPOSED SUBMISSION VERSION JANUARY 2020
AND ASSOCIATED PROPOSED CHANGES TO THE POLICIES MAP JANUARY 2020**

Savills is instructed by Harrison Homes ('the client') to respond to The Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 and associated Proposed Changes to the Policies Map January 2020 (DRLLP PSV and associated PCPM Jan 2020), which have been published prior to submission for independent examination, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

We set out our client's formal representation and the background and context to the organisation's comments below.

1. Background and Context

The client is a non-profit organisation that "*aims to provide and maintain high quality housing and support for older people of limited means in London*". This includes developing the highest standard accommodation, creating a friendly and supportive environment to enable residents to live independently, developing skills and solutions to tackle problems associated with age, and promoting a greater awareness of the housing needs of older people.

The client's first almshouse was acquired in 1869; and now the charity owns and manages 12 almshouses, providing accommodation to 171 residents. The client remains one of the leading providers of such housing in London today, and has houses located to the south, west, east and north of the city.

One of these homes is the Portal Home for Ladies (Tonge House), located within the centre of the Royal Circus roundabout, in West Norwood (**See Map at Appendix 1**). Tonge House was first built in 1936, with a bequest from Miss Bertha Mary Portal, who wished to provide good quality and secure accommodation for single Christian women in the parish. The charity was then managed by local trustees, and following retirement of the live-in caretaker, the client was approached by the trustees and took over in November 2017.

Following discussions and acting in close partnership with Harrison Housing (the charity freeholder of the land), it was agreed that the property presents an excellent and compelling opportunity to increase the number of almshouse units within the generous grounds of Tonge House, approaching a century after its original development, consequently increasing the beneficiaries of Miss Bertha Mary Portal's bequest. The charity trustees are of course mindful of the current and growing housing crisis across London, and whilst not minded to overdevelop the West Norwood site, they are actively contemplating options to seek to increase housing units on site in such a way that significant garden and green space areas would be maintained and/or provided through new development, of the highest quality.

Indeed, trustees are at the early stages of working up a redevelopment master plan for the site's future – and a consultancy team has been appointed to provide advice on land uses, design and technical matters, as well

as to carefully assess impacts of any new development on the existing site, nearby neighbours and the wider locality. Any development plans will also need to consider and address topics including landscape visual impact, transport considerations, biodiversity and ecology, impact on trees, public access to the site and its linkage to the community both physically and functionally, energy use and consumption, and of course, the principles of good design. To ensure that there is a transparent and open dialogue, it should also be noted that the charity trustees have made the Portal Home existing residents at Tonge House broadly aware of the future plans for the site.

2. Consultation and Policy

The London Borough of Lambeth (LBL) is currently preparing its new Local Plan, and has recently published DRLLP PSV and associated PCPM Jan 2020 (Regulation 19) for a 6-week consultation, to today's date.

Our representation focuses on the DRLLP PSV and associated PCPM Jan 2020, which has identified the site as a proposed new **Site of Importance for Nature Conservation** (SINC). Whilst we note that the site was identified as a SINC within the previous draft revised Regulation 18 consultation, at that time, no decision had been made on the future redevelopment of the site, and this consultation is the client's earliest opportunity to make a formal representation.

We also comment here on the associated SINC policy, and how this could limit and be considered within the redevelopment of the site.

➤ Royal Circus Roundabout – Proposed New Site of Importance for Nature Conservation (SINC)

Within Table 12 of the PCPM, Royal Circus Roundabout has been allocated as a proposed new SINC. A map inset of this has been included within **Appendix 2** of this letter. The reason for the allocation has been outlined below.

“A relatively large area of predominantly native broadleaved trees, grassland and herbaceous planting within a dense urban area”.

Policy EN1 (Open Space, green infrastructure and biodiversity) includes criterion (b), which prevents development which would result in the loss, reduction in area or significant harm to the nature conservation or biodiversity value of an open space including and designated or proposed SINCS, unless adequate mitigation or compensatory measures of equivalent or better biodiversity value are included, appropriate to the nature conservation value of the assets involved. It further states that in the case of SINCS, the mitigation hierarchy in London Plan policy G6 C (**Appendix 3**) will apply.

Criteria (e) and (f) of the policy seek to improve the access to existing open space and green infrastructure, and also ensure that the new London Plan Policy G5 (Urban Greening) is applied on all major developments.

3. Representations

On behalf of our client, it is requested that the Royal Circus Roundabout should be **removed** as a proposed new SINC from the DRLLP PSV and associated PCPM Jan 2020.

The site in its current layout and use is significantly underutilised; and it is a valued asset that will be important in helping drive forward the almshouses' future development and housing plans for persons in need. We consider that a draft, 'blanket' SINC across the whole site might well significantly jeopardise and moreover stymie any such potential.

As noted previously, any redevelopment of the site would need to ensure that other factors are considered comprehensively. More specifically in respect of open space, green infrastructure and biodiversity matters, the redevelopment of the site has the potential to unlock an area of land which will partially provide a high-quality

area of open space and green infrastructure that would potentially be enjoyed by both future residents and members of the public alike.

It should also be noted that the future development proposal will ensure that the new London Plan SINC mitigation hierarchy (Policy G6) and urban greening (Policy G5) are considered and incorporated respectively.

Whilst the plans for the redevelopment of the site are still at an early stage of preparation, a future scheme will also contribute to Lambeth's housing requirement of 13,350 homes (Policy H1), as set by the new London Plan. Furthermore, and importantly in respect of the existing land use on site, any new proposal would ensure that any accommodation is compliant with Policy H8 (Housing to meet specific community needs) of the DRLLP and Policy H13 (Specialist older persons housing) of the new London Plan.

We anticipate coming forward shortly with a formal request for pre-application advice for your Planning Department, and to present outline development options of how this site might look in the future.

1.0 Summary Conclusion


On the grounds set out in this letter, our client requests that the associated Royal Circus Roundabout SINC allocation described above be removed from the DRLLP PSV and associated PCPM Jan 2020.

As noted above, the site in its current use and layout is underutilised, and a redevelopment proposal would necessarily be required to seek satisfactory provision of open space and ensure that appropriate landscaping, conservation and biodiversity measures are considered. Furthermore, any redevelopment scheme would also contribute to Lambeth's housing requirement (including older persons specialist housing).

I trust my letter is clear and helpful, and that the Inspector will take full and proper account of our client's request and clear objectives. In the meantime, if the Inspector or Programme Officer have any immediate queries, please contact me or my colleague, Edward James AssocRTPI.

We would appreciate being kept closely informed of the progress of the DRLLP PSV and associated PCPM Jan 2020. We may wish to supplement and/or clarify these representations in person, or in writing, at a future date, including at any Examination into the plan. We therefore reserve our client's rights in that regard.

Yours faithfully,



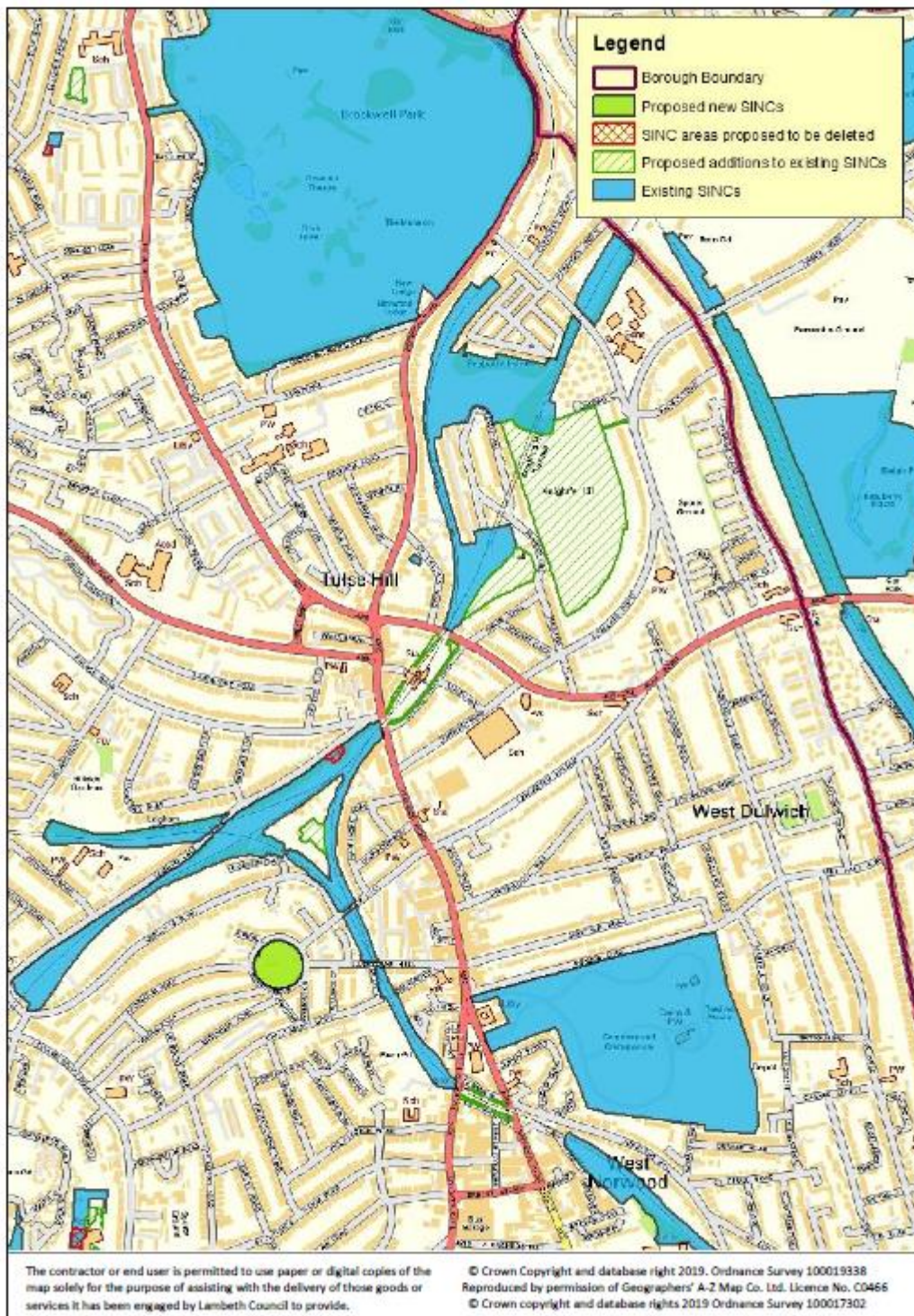
M D Washbourne MRICS
Director

Enc: As stated
Cc: Client project team
Trustees

Appendix 1 – Aerial View of the Royal Circus Roundabout Site



Appendix 2 - Proposed changes to existing SINC and proposed new SINC designations to the south of Brockwell Park (site identified as light green circular shape)



Appendix 3 – Policy G6 New London Plan. Criterion C relating to SINCS.

- G <https://www.thenbs.com/knowledge/the-nbs-guide-to-facade-greening-part-two>
- H <https://www.rhs.org.uk/advice/profile?PID=818>
- I <https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf>
- J <http://www.susdrain.org>

Policy G6 Biodiversity and access to nature

A Sites of Importance for Nature Conservation (SINCs) should be protected.

B Boroughs, in developing Development Plans, should:

- 1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
- 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
- 3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
- 4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
- 5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

C Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

Appendix 3 – continued

The London Plan – **Intend to Publish version**

December 2019

- 1) avoid damaging the significant ecological features of the site
 - 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
 - 3) deliver off-site compensation of better biodiversity value.
- D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- E Proposals which reduce deficiencies in access to nature should be considered positively.

8.6.1 Sites of Importance for Nature Conservation (SINCs) comprise:

1. Sites of Metropolitan Importance – strategically-important conservation sites for London
2. Sites of Borough Importance – sites which support habitats or species of value at the borough level
3. Sites of Local Importance – sites which are important for the provision of access to nature at the neighbourhood level.

n.b. Several Sites of Metropolitan Importance also have statutory European or national nature conservation designations (see paragraph 8.6.3)

8.6.2 The level of protection afforded to SINCS should be commensurate with their status and the contribution they make to wider ecological networks. When undertaking comprehensive reviews of SINCS across a borough, or when identifying or amending Sites of Metropolitan Importance, boroughs should consult the London Wildlife Sites Board.