

Objection to 15/03867/OUT, 128 Knight's Hill, SE27 0SR on behalf of Norwood Action Group and Norwood Forum

Introduction and Summary

It is acknowledged that the applicant has made efforts to produce an acceptable plan but regret that the outcome is inappropriate for the location. This is for four fundamental reasons:

1. Until membership was deliberately curtailed in 2007, the club had been a sport and community social facility for the neighbourhood since at least 1925. There is none like it nearby. Although the plan would re-open the site to the public it would not be as inclusive as it has been or could be.

The plan reduces outdoor sport and recreation space by more than 50% and therefore conflicts with saved Policy 50 of the UDP **and** emerging policy EN1 of the soon to be adopted Lambeth Local Plan – neither policy allows substitution of outdoor sport space by indoor sport space (though expressed with greater clarity in EN1).

In addition, it conflicts with London Plan 3.19 by decreasing sport provision – the plan offers less of what is wanted, and a modicum of what there is now a lot more of 400 metres away at West Norwood Health & Leisure Centre. Conversion of half the tennis area to superfluous mini gym and community hall represents a reduction of outdoor sport space.

If permitted to do so, a confederation of local enthusiasts and professionals can fully finance and renovate the facilities with enhanced provision and utilisation for all ages of the community for sport, play and simple leisure. This alternative to redevelopment **must** be considered under para 9.3 of the Lambeth Local Plan.

2. The inclusion of sport and cafe provision appears to be an unviable token to attempt to satisfy Policy 50 (whilst silent on Policy EN1), also the business plan is flawed and disingenuous. When the sports business inevitably fails it would result in the permanent loss of sport provision on this site, contrary to the aims of Policies 3.19, 50 and EN1. For this reason, close examination of the facilities offered and the business plan is an essential planning consideration.

3. The sport retention requirement and personal and commercial profit motive have resulted in a plan that is an overdevelopment with excessive bulk and mass. The application does not respect the adjacent Cheviot Garden sheltered housing redevelopment of 84 homes many of whose residents will be faced by a massive development instead of the view intended from the crescent flats. To other local residents, visually the development will join as if one mass with Cheviot Gardens, already overbearing in the extreme, and inappropriate to the townscape, contrary to policy.

4. Parking stress. The new Transport Statement gives clear grounds for expecting that parking stress will reach 100% in the closest roads (Cheviot and Roxburgh Roads), and probably beyond.

Also:

5. Additional factors

Details:

Re 1 The situation described in 2.2 and 2.3 of the Design Statement is the result of deliberate policy to run-down the site. This is evident from the closure of membership and the effective lock-out of the community that used to support it, and the refusal to permit a new committee modernise and improve the facilities. The failure to take these steps is a material consideration in an application that would lose more than 50% of outdoor sport and recreation space.

There is a confederation of community and sport groups who wish to revitalise it for the widest community use and have achieved **Asset of Community Value** status for the site. However, the current operator of the site, West Norwood Tennis Club, has determined to sell the site at development values and has rebuffed all attempts at discussion.

The contentions of 6.4 to 6.10 of the Planning Statement attempts to demonstrate compliance with Policy 50 but makes no attempt to address Policy EN1 of the soon to be adopted Lambeth Local Plan which is material to this application.

It fails Policy EN1 (a) as it does not satisfy any of the offsetting sub para tests (i) as it does not achieve “major planning priorities that cannot be achieved in any other way”, (ii) does not apply and (iii) as the proposals are not “appropriate in scale or form to the size and character of the open space” (it would be changed out of all recognition) and it would “harm the function and operation of the open space” (two out of four courts lost).

It fails EN1 (b) on biodiversity.

It fails EN1 (c) by reducing, not increasing, open space.

It fails EN1 (d) because it reduces the “existing” open space and it reduces biodiversity, nature conservation and heritage value.

It pays no regard for para 9.3 which states “development of open space will only be considered in very limited circumstances” and requires “**all other alternatives have been considered and ruled out**”. The alternative of a newly managed existing club has not been considered at all. 9.3 concludes “... proposals must still achieve an overall better quality **and quantity** of existing open space”

Demand for housing is not a compelling reason to override policy in this case as Lambeth is ahead of its current targets by a 5% margin (source – Lambeth Planning)..

Re 2. The developer had stated that they were looking for a professional sports group to operate the facilities; presumably none has been attracted, probably due to the figures not being viable.

The Viability Assessment lacks credibility. The author is the development company which acknowledges that it has no experience of operating a sports facility and there is no qualified endorsement. Appropriate market research is not evident. There is no reference to the nearby new West Norwood Health and Leisure Centre that provides more comprehensive indoor facilities plus a 25m swimming pool (though no tennis or squash). There is no reference to the café currently under construction in the adjacent Cheviot Gardens redevelopment or many down Knight’s Hill – effectively it would be a players’ only café.

Specifically, the projected Profit & Loss Account appears to be plucked from the air. The LTA (with which it wishes to affiliate) state 70 maximum per floodlit court (squash is similar)

and only 50 if not floodlit (floodlights are not included in the application); 450 playing members is unachievable, even with fewer there would be little if any opportunity for pay as you play revenue; how long would the rent be £10,000 per year?; allowances for telephone, electricity, water and heating are inadequate for this commercial operation; no insurance, etc, etc. A more careful example from a real club, Hampton-in-Arden Tennis Club. may be found on page 10 at <http://hamptontennis.org.uk/clubmark/cm1.1.pdf>

There is no indication of a guarantee or underwriting of the sport/café operation's continuance. Such support as is offered could be withdrawn or fail at any time.

LTA affiliation will require a substantial commitment to many matters that use time and have associated costs, and do not generate profit, such as junior training and play. The business plan is fanciful and naive.

Re 3. At 5.7 of the Planning Statement it asserts agreement with the West Norwood Masterplan adopted in 2009 (compiled in 2008 with much of its evidence base much older). These assertions are in part incorrect, and where applicable highly qualified. The Masterplan is presently under formal review due to its lack of current relevance but in any event does not form part of policy. It is merely an outdated evidence source. In short, the Masterplan has little, if any, relevance.

The effects of and to the Cheviot Gardens redevelopment under construction have not been addressed in the application. Together they would represent an excessive massing on this previously low-density location. The street elevations from the Design Statement do not properly include the Cheviot Gardens redevelopment when completed. A graphic is necessary to show the Cheviot Road elevation on completion with existing housing and Cheviot Gardens as it will be. Without this it is not possible to make a positive assessment so as to approve the height and mass.

Reference <http://planning-docs.lambeth.gov.uk/AnitePublicDocs/00566966.pdf>. Section A-A in 00566966 is misleading. Nowhere in the submitted documents is it made clear that the fifth storey portion of the development would immediately face a section of Cheviot Gardens, currently under construction, which is a full storey lower. The two developments would not sit well together.

Reference <http://planning-docs.lambeth.gov.uk/AnitePublicDocs/00566964.pdf> west elevation shows an overbearing and architecturally barren outlook for the residents of Cheviot Gardens sheltered housing.

If this outline application is approved the outcome could be that these flats lower on the hill will be higher than the flats under construction further up the hill. Not only will this be overbearing for the occupants of the sheltered housing of Cheviot Gardens but it would be inappropriate townscape in this locality.

Re 4. It is unfortunate that the survey did not include mid-morning or afternoon when parking is heaviest due to West Norwood Station commuter parking and miscellaneous local business all-day parking. Nor when the adjacent Trinity Baptist Church is holding one of its overflowing services. Also, the Transport Statement for whatever reason does not give stress reports for Roxburgh Road (reported in the 2011 statement as hitting 85% at the off-peak measurement time), Chapel Road and Weaver Walk.

It is a fact that parking does not distribute evenly, it will precipitate to the closest roads Cheviot and Roxburgh; only when they are filled will parking go elsewhere, but it will not be east of Knight's Hill. Parking in Rothschild Street and Chapel Road (included in the Key Industrial and Business Area) is close to 100% in the daytime due to commercial parking

including large goods vehicles. Rothschild and Weaver Walk are much less parked overnight because vandalism and break-ins to vehicles in these unobserved non-residential streets is not unusual; also many people are wary of them because of a perceived risk of mugging or other violent event which although rare, have occurred. The Transport Statement made the innocent assumption that because there are overnight spaces in these locations, they will be used.

Re 5. There is now a designated outdoor children's play area in the plans. This strip to the west has the potential for significant sunlight only between noon and 2pm as it lies in a north-south canyon between tall buildings. The strip of land to the north will never receive sunlight.

The Habitat Survey was prepared in July 2006 so cannot be demonstrated to be accurate after nine years.

The Sustainable Urban Drainage System report simply kicks the question down the road and suggests a condition to an outline planning consent, if given. We contend that this is a matter fundamental to the outline application, as difficulties are not always easily remedied. This presents a later challenging situation for both developer and council.

The application states that it is a resubmission of 14/06822/OUT and seeks to address the reasons for refusal of that application. We particularly assert that Reason 1 has not been adequately addressed; also, particularly, re Reason 2, the claim of sunlight for most of the day on the children's play area is erroneous and no evidence is offered to prove the claim.

Rob Andrew
on behalf of Norwood Action Group and Norwood Forum
26 July 2015