

Your name	Marie Staunton
Organisation Name	SE5 Forum
EiP Hearing Matter No.	Matter No 5 Economic Prosperity and Retail
Specific Strategy, Policy or Question	AV05 Camberwell Area Vision Site allocations 23,24 25,26,27,28,32,33 P34
The test of soundness the plan fails	The policy is not positively prepared.

*Max 3000 words in total to respond to each Matter you wish to address. More details in the PAL Toolkit.
Points to focus on:*

- *Why does the policy fail? What is the problem?*
- *Evidence*
- *How can it be made sound? Suggested alternative text - identify the Policy No. and paragraph on NSP EiP27A submitted 2020 version.*

In this written submission SE5 Forum respond to some of the MIQs and put forward proposed alternative wording.

EiP Matter 5

Town and local centres

P34

5.44 Taking each criterion in turn, are the requirements justified? Is this supported by evidence? Is the evidence up to date?

5.37 What is the scale of each type of main town centre uses proposed and are these justified?

5.43 Are any main modifications required to the town centre and shopping policies, particularly considering the changes to the Use Classes Order?

1. Major modifications and Use Classes order

The Town Centre and Shopping policies for Camberwell and the site allocations do not take sufficiently into account new use class orders F1, F2 and E Museums and galleries. AV05 refers to the important cultural assets of -Camberwell (University of the Arts London) and award winning South London Gallery, but not to Camberwell arts festival, one of the first and now longest running local visual arts festivals in the UK. These institutions have led to many town centre businesses and as well as Burgess Park there are major artists studios at Vanguard Court , embassy mews and other town centre buildings as well as two galleries. These attract visitors to the other shops and give Camberwell Town Centre its

nature . Failure to develop the creative economy in Camberwell would disadvantage other retail outlets. F1b is important for the town centre but only two site allocations refer to creative uses.

AV05 does not draw the link between local hospitals (Kings and the Maudsley) and the development of local health businesses under new use class Ee, including two new high street health businesses in the past three years which are an attraction to be encouraged.

These are important areas of growth for Camberwell and are in line with the Plan for London Mayor's SPGs Town Centres Supplementary Planning Guidance 2014 3.59 ,3.60 section1).

and the London Recovery Plan.

The town centre lacks a community meeting space (new use class F2b) which is not included in site allocations

Amendments

AV05 refers to creative industries and should include the words local health businesses and community meeting space

Site allocation 23 Butterfly walk says the site " may include cultural uses " and the words local health business and community meeting space should be added

Site allocations 25,26,27,28, should include the words "may include cultural uses local health business and community meeting space "

Site NSP32 is an important major site in the centre of Camberwell's town centre -the former Magistrates Court. There has been informal commitment by Councillors to some community use -but this is not reflected in the site allocation at all. It should include the words "site allocation should include cultural uses and community meeting space "

2. P34 .2 states that development “should be of a scale and nature that is appropriate to the role and catchment of the centre”; It does not include the need for an overview of the town centre, reinforcement of its heritage and particular character, the factors that attract visitors or the positive management required by the Plan for London. The plan is silent on the need for place making in town centres as a destination for residents. In Camberwell there is no tally of creative spaces or health businesses or consideration of what could draw passengers from Denmark Hill Station to the towncentre (Passenger numbers at Denmark Hill station have increased by more than 5.4m to 7m in the last 15 years, with another 33% increase expected over the next 20 years)

Lack of these requirements could mean that the NSP could fail to meet the requirements of the Plan for London .e.g. since the plan was prepared Camberwell police station (part of Site allocation NSP23) which is 0.53 acres fronting Camberwell Church Street in the centre of Camberwell has been sold. It was marketed as a large housing development, but no planning permission has yet been submitted. It has the potential to change the appearance and use of the town centre without regard to the advantages of place making in the town centre and a retail strategy and signposts to draw customers down from the station .

3. Forward looking positive approach to growth

For the centre to be a thriving retail centre the Plan for London requires Southwark to take a “*positive approach to the growth, management and adaption of town centres*”

The approach to Camberwell Town Centre AV05 is not sufficiently comprehensive and does not for instance include the positive engagement and planning needed in town centres required by the London Plan (Mayor's SPGs Town Centres Supplementary Planning Guidance 2014 3.59 ,3.60 section1) .It is not forward looking e.g. it does not relate to the London Recovery Plan 2020 mission to “Deliver enhanced public spaces and exciting new uses for underused high street buildings in every Borough by 2025, working with London's diverse communities ”

In contrast Southwark has shown some excellent forward looking practice in the Town Centre in relation to NSP21 Camberwell Station and we would like that to become standard across Camberwell

Positive practice

Prior to the abolition of the Camberwell community council there were good examples of consultation e.g. Southwark's bid to the Mayors Good Growth fund started when there was a community council, succeeded in winning funding for Camberwell Station Road, engaged locals well, has local resident representation on the decision making process for choosing contractors and has a requirement for placemaking and reflecting the local design and heritage and identity. It proposes a forward-looking scheme which brings together residential, green spaces and business needs and mitigates the conflicts between them. The design brief tender document includes a requirement on "**Place making:** This project will integrate place making into the public realm to reflect the distinct identity of Camberwell building on the local identity already developed with the local community"

Need for a forward positive approach to economic growth

There is much support in Camberwell for a positive forward-looking approach to the town centre. A thriving town centre needs a distinctive identity to attract businesses and customers. e.g., the AGM of the SE5 Forum in October 2019 discussed the 15-minute city, the Mayors London Plan, and the work of the London Recovery Board and how that applies to Camberwell town centre-but there is no effective Council/community mechanism to move proposals forward.

To fill the void created by the lack of a Camberwell Community Council and consultation three local groups came together in 2018 to develop a Camberwell Identity group (SE5 Forum, Camberwell Arts and Camberwell Society). The aim of the group is to improve footfall and encourage existing and new businesses. It has consulted and developed a Camberwell identity.

An extensive local consultation was carried out in the town centre, online, in public meetings and on estates (300 responses). The work aims to develop pride of place and promote Camberwell Town centre to encourage the 7 million people a year who use Denmark Hill station to not only visit the hospitals but also to patronise the local businesses in the town centre. Award winning designers (Sutherland& Co were appointed after a competitive tender and local consultation. The local consultation agreed a local identity for Camberwell -with designs, banners, a themed entrance to Denmark Hill station, a Camberwell. Life website and a Love Local campaign.

So Camberwell Identity group are now negotiating with individual developers (Camberwell Lanes) to include a planning condition in their applications to use the local identity assets of Camberwell and have regard to its local design and heritage. Clarity in P34 and AV05 would avoid this having to be negotiated for each appropriate site allocation

This affects the site allocations in the town centre and those on the route which bring customers from Denmark Hill to the town centre.

Amendment after P34.4. catchment insert "existing character and future development"

NSP site allocations 23, 24, 25, 26, 32, 33.

Insert Place making: the sites must integrate place making into the public realm to reflect the distinct identity of Camberwell building on the local identity already developed with the local community.
AV05 For Camberwell town centre to become a destination for visitors the public realm and site allocation design briefs will reflect the distinct identity of Camberwell building on the local identity already developed with the local community.

P34 4. Not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the vitality and viability of the centre.

This requirement is not justified because it is not sufficient. The proposal for residential use in some key site allocations is in the town centre is in line with the Plan for London and we do not object in principle. However different uses close together has caused conflict between occupiers leading to campaigns and legal action often based on noise nuisance. Southwark should look at mitigating the negative effect of

residential retail and night-time economy uses sited close together. It should also mitigate the conflict between its policies e.g., on cycling and markets.

1.The London plan and NPPF guidelines stress the role of markets.

AV05 does not mention Camberwell Market -a Saturday market which has been running for some years. On January 8th, the vegetable market stall (Keely's veg stall) outside Denmark Hill station heard that the area on which it is standing was to become a cycle route and it was to be closed in two weeks. Within a few days 1365 people had signed a petition on change.org and on January 22nd the decision was withdrawn

This incident shows how Southwark need to reconcile conflicting policies (cycling and markets) and to consult on the removal of important local amenities

2.There have been several occasions when failure to have a clear plan in relation to policies which conflict -causing local disputes particularly about noise

a. Club couture was a nightclub /bar on the corner of Camberwell Church St and Camberwell Grove. A long running noise nuisance battle resulted in its closure after many years of rancorous dispute. This community conflict was caused by a lack of planning for how Camberwell's night-time economy and other retail and residential uses should be managed.

b. Camberwell Station road has been an area of tension between residents, existing local car repair businesses and churches holding loud services in the evenings. Residents have campaigned for police action against the car repair businesses and this has absorbed scarce police resources for many days. One local church has been prosecuted for noise nuisance. The proposals for residential use in the Camberwell site allocations, whilst in line with the London plan fail to set out how conflict in the community can be averted by reconciling policies on night-time economy, cycling and retail, residential and workshops. This would particularly be a problem in Site allocations 23,25,26,27,28,32

As stated above the major site of Camberwell Police station has been sold as housing land. It is in a prominent place on the High street with a building that would qualify for local listing. No planning permission has yet been applied for. But the development of this building as solely housing with no community retail or cultural use could harm the amenity of the area

Amendments

P34.4 after "not harm amenity of local occupiers" insert "ensure there is not conflict between different uses "

P34.4. after viability insert "economic growth "

AV05 add "encourage retention and development of local markets for food and creative industries"