

Eileen Conn - Written Statement for the Examination in Public (EiP) of the New Southwark Plan (NSP).

I have lived in Peckham since 1973 and for much of that time have been active as a resident in planning and other neighbourhood matters. I have co-ordinated the work of Peckham Vision and SPN (Southwark Planning Network) to encourage and develop systems to support others to take part. My main areas of concern about the soundness of the policies are informed by that community work and my own views from living and working in the borough. I have responded to all NSP consultations, and made representations on policies which appear in each Matter except SP4, in particular IP7 Community Involvement (SCI), SP2 Regeneration that works for all, SP5 Healthy active lives, Peckham site allocations, Local List, tall buildings and borough views.

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Matter 2 – The Spatial Strategy and Area Visions

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Issue 2

As part of the spatial strategy for the Borough, will the plan deliver sustainable regeneration that will be 'successful' for both existing and future residents, businesses and community services and spaces?

No. it cannot deliver sustainable regeneration that will be 'successful' for existing communities, and probably not successful either for future residents. This is because the policies lead to a development approach which is in practise often demolition-led regeneration. This damages or destroys existing communities and neighbourhoods, and for future residents there is a loss of community and continuity. Further explanations are given below in response to the Questions.

Policy SP2 – Regeneration for All

2.16 Are there local areas for regeneration in Southwark to which Policy SP2 is specifically aimed at? Is the focus for regeneration in the borough broadly aligned with the London Plan opportunity areas, the strategic areas for regeneration (based on indices of deprivation) identified in the Intend to Publish London Plan 2019 or is it broader?

This is unclear and so unsound. The map indicates that it is confined to specific regeneration areas shown on the London Plan map areas. But it also now says that Social Regeneration Charters, which are the implementation tool for regeneration areas, will cover the whole borough. Clarity is required on what is and isn't on the table for regeneration and, more broadly, how the Council understand and define regeneration as a city making process.

2.17 Will the policy be effective in securing sustainable regeneration in Southwark (social, economic and environmental), in a way which ensures existing communities, including businesses and community infrastructure, retain access to affordable accommodation, especially in fast changing areas of the Borough, consistent with paragraph 93 of the NPPF and PPG para 53-006-20190722? What is the role of social regeneration charters and is this appropriately reflected in Policy SP2?

Sustainable regeneration for existing communities?

Sustainable regeneration for **existing** communities is vital for regeneration that works for all. Achieving this requires a significant role in the Plan for the **existing assets and uses** before any redevelopment plans are initiated, and a different approach to community engagement.

But these are absent from the Plan which encourages demolition-led regeneration across large parts of the borough, with ineffective community engagement. An example of this tendency for demolition-led regeneration were the Council plans for three large sites in Rye Lane around Peckham Rye Station in the heart of Peckham town centre. These sites contained old buildings full of small enterprises, and showing significant potential for self regenerated development of the town centre economy. Over a period of 15 years, the

community had to campaign against these destructive policies and in each case succeeded in reversing them. This was through a community-led approach starting with the facts on the ground about the existing buildings, their uses and their self regeneration potential for the area. As a result, before the pandemic lockdowns, Peckham town centre had become widely known as a favourite destination, a prime example of the potential for self regeneration without demolition and redevelopment. An essay from me about this and the need for fact-based audits was published in 2020 on the Grosvenor Estate website and by the South London Press. A copy of the essay is attached.

Over the last few years in the Old Kent Road Opportunity Area we have observed the same approach where plans covering many sites are mainly for demolition and rebuild. This is also unsound in relation to the climate emergency strategy. Carbon emissions from demolition and new construction are a very significant contributor to the climate emergency. A reorientation away from demolition-led regeneration, and a preference for recycling and retrofitting buildings and spaces is essential for consistency with the climate emergency policies.

Many planning policies in the NSP are written to try to create safeguards for preventing harm from redevelopment. It is right to make these safeguards explicit. But often they reinforce the idea that regeneration is led by demolition and redevelopment. To make the Plan sound, policies should be redrafted to reverse that idea to express a clear preference for regeneration approaches based on re-use, refurbishment and repair rather than redevelopment and reconstruction. An example is given below for P17 Efficient use of land.

This is essential to achieve regeneration that works for all. Progress can be made towards this by a thorough fact-based audit leading to a report of all existing assets and uses conducted and agreed with the local stakeholders before redevelopment plans are initiated. That report would be a required document in the planning process before a planning application can be validated. Any proposals for demolition and redevelopment would then be assessed against the agreed fact-based audit. No permission could be given, for demolition and redevelopment, if the proposal could not demonstrate that it would provide significantly more net benefits for the existing community than could be achieved from the retention and nurturing of the existing assets and uses.

The Council's new Development Charter, following a consultation in 2019, now includes a 'fact-based audit'. But it gives no guidance on what this should contain or how it should be produced. By itself that will not therefore enable SP2 to be effective.

Changes needed to protect the interests of existing communities

The need for a fact-based audit needs to be written explicitly in to the policies in SP2 'Regeneration that works for all'. An example of this might be –

an additional policy inserted between current points numbered 2 and 3 in SP2:
2A. Ensuring that regeneration plans are preceded by the production of a detailed fact-based audit identifying all existing neighbourhood assets (buildings, spaces, infrastructures). This audit should be produced and agreed collaboratively with local stakeholders, with subsequent regeneration proposals assessed on the basis of whether or not they offer a net benefit to existing neighbourhood assets and infrastructures.'

This should be carried through to Development Management (DM) policies, and could be linked to a policy promoting reuse and refurbishment of buildings instead of demolition and rebuild. An example is the Policy CS15 in the City of London's 2015 Local Plan "*Avoiding demolition through the reuse of existing buildings or their main structures and minimising the disruption to businesses and residents using sustainably sourced materials and conserving water resources.*" Here is a way this might be done within the DM policies specifically linked to SP2 –

Additional policies should be inserted into P17 Efficient use of land, as new numbered points (highlighted in red):

1. Development should start with a clear preference for regeneration approaches based on re-use, refurbishment and repair rather than redevelopment and reconstruction.
2. Development will be permitted that:
 1. Maximises the efficient use of land; and
 2. Does not unreasonably compromise development potential or legitimate activities on neighbouring sites; and
 3. Provides adequate servicing facilities, circulation spaces and access to, from and through the site; and
 4. Demonstrates it provides significant net benefits for the existing neighbourhood compared with the retention and nurturing of the existing assets and uses.
3. Development should be permitted for ...'meanwhile uses' ...

Reasons

Existing assets and uses have a value for the existing community, and regeneration must work for them as well as for new residents and new uses. To be consistent with SP2, the efficient use of land requires an assessment of the facts on the ground of any buildings or uses or social infrastructure that would be destroyed by a proposed redevelopment. This fact-based audit must be produced in collaboration and agreed with all the local stakeholders, along with a statement of the social impact of the development. The process for the audit and social impact assessment will be set out in an SPD.

Impact on affordable accommodation?

This new approach to the existing neighbourhood, before redevelopment plans can be initiated for discussion, would create a partial barrier to the immediate inflation, in the price of land and rents for both residential and business accommodation, that currently is the effect of an area being designated for regeneration. This is essential to enable regeneration to begin to work for the existing community. It could also be the beginning of a more ambitious policy for the reprovision of affordable (retail, industrial, housing and community space) lost over the last 30 years.

Social Regeneration Charters?

The Charters are a good aspiration but they have been introduced into the NSP planning process long after the redevelopment approach to regeneration has emerged. They have not yet been able to catch up with the relentless redevelopment that is sweeping the borough.

The process is deficient in two important respects:

- (1) the lack of baseline data to monitor the effects of the regeneration, including the lack of monitoring of a cohort of existing local people (residents, businesses and employees) in a particular area over a minimum of 10 years, and
- (2) the lack of an agreed sound collaborative process for community engagement.

The proposed changes suggested above to SP2 and P17 would begin to go some way to remedying those defects. But to be sound, SP2 needs also a policy statement that embodies the commitment to monitoring the impact against sound baseline data collated and agreed with the collaboration of the local stakeholders.

Because SP2 is tied to policies P13 – 25, so too was the monitoring process. Table 4 in Annex 5 of the 2018 version was tied solely to Policies (now P13 – P25). These were simply the policies concerned with physical fabric and not adequate or effective to monitor SP2 Regeneration that works for all. This table and Annex has been changed into IIA Appendix 9 which may be a response to the critical comments on the 2018 version. I have asked the Council for the meaning of their explanation 'updated to be the same as Regeneration for

All'. Subject to the response I may have some questions to raise on it, as monitoring these policies in a satisfactory way is essential for soundness.

Consistent with Paragraph 93 of the NPPF and PPG para 53-006-20190722?

These national policies set out the role of planning in achieving sustainable, inclusive and balanced communities in estate regeneration. They are also consistent with this SP2 policy of regeneration that works for all housing tenures. They should be applied not just to named estates but to all areas with coherent demographics, for example with high levels of tenanted dwellings.

2.18 Does the Plan, including Policy SP2, provide sufficient safeguards to ensure that regeneration respects the character and heritage of the Borough?

No. Policy SP2.9 is inadequate in providing sufficient safeguards to protect local character and heritage for the reasons given above. Very little 'regeneration' is heritage-led. It is very often an afterthought once redevelopment plans have been initiated and islands of old buildings are protected in a redevelopment area. Moreover heritage includes social and intangible heritage and not just building fabric. All of these also need a real fact based audit and social impact assessment before any redevelopment plans are initiated for discussion. I suggest a modification as highlighted in red:

9.Enhancing local distinctiveness and a heritage-led regeneration approach that recognises both tangible and intangible heritage assets, requiring the highest possible standards of design, creating vibrant, attractive, healthy, safe and distinctive buildings and places that instill pride of place in all our communities. This will include networks of green infrastructure, opportunities for healthy activities and improving streets, squares and public places between buildings; and
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2.19 Is there a role for Supplementary Planning Documents in supporting regeneration, including planning frameworks for opportunity areas or do existing and forthcoming Area Action Plans provide necessary detail for those areas of particular change in the Borough?

There is an important role for Supplementary Planning Documents in the production of fact-based audits and social impact assessments, to provide guidance on their production as part of the pathway to planning approval. Producing a fact-based audit is already enshrined in the Development Charter as a requirement. This could lead a reorientation from regeneration tending to be led by demolition, to regeneration led by an agreed collaborative statement of the social, economic and environmental facts on the ground and the possibilities for appropriate development, ie a neighbourhood plan and social regeneration charter agreed with the local stakeholders. This would make it more likely that regeneration works for all existing and future residents and local businesses, and promotes their well-being and reduces inequalities.

It would be essential that these SPDs were a collaborative production with community organisations and not the result of just the usual consultation process which has proved inadequate for planning policy hitherto.

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Southwark News - <https://bit.ly/2zUoHtD>
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southlondonlives



Eileen takes local regeneration to another level...

One day in the summer of 2005, I ventured into a passage off Rye Lane in the middle of Peckham town centre. I live 10 minutes walk away. I went to find out about a large site in the borough development plan which was at the time subject to public hearings.

The site was designated for total demolition and redevelopment.

I discovered a place full of large sturdy Victorian era industrial buildings, home to a wide range of businesses from artists, to churches, to furniture makers, to town centre warehouses, a DIY and builder's merchants, and many other activities.

An active place with much small and micro-economic life all overlooked or dismissed by the planners, consultants and developers except as a site needing 'regeneration'.

We had to campaign for three years to publicise the facts about the site and its potential. It is now seen as the heart of the cultural quarter in Rye Lane, known as Copeland Park; the Bussey Building.

The gap between reality and 'regeneration' sparked off the local campaign under the banner Peckham Vision. The vision was and is based on reality and how places fit together and cannot be simply separated out as 'sites'.

A few years later having won that battle, we were plunged into another across the road around Peckham Rye railway station.

Network Rail and Southwark council published plans for vacant possession of about 60 small and micro businesses that had taken root in the arches and buildings around the station.

These included Blenheim Arches Studios, Bar Story, Peckham Springs and Brick Brewery.

But they and others were to be removed to build five to seven storey blocks of flats out of scale with the conservation area.

This was for 'regeneration'. Yet the place had been self-regenerating for several years becoming a vibrant part of the emerging local leisure and entertainment economy.

Eileen Conn is coordinator of Peckham Vision and active as a resident in community groups in planning at neighbourhood, borough and London levels. She was awarded the MBE in 2009 for services to the community, and included by *The Planner* in their list of 'Women of Influence 2020' for her pioneering contribution to community engagement in the planning process.

The local community once again had to fight a hard campaign to point this out and win the battle.

Similar issues arose with Southwark council's plan to demolish the multi-storey car park.

Peckham Vision's campaign led to more than 5,000 letters objecting.

The plan was dropped and that led to the saving of Peckhamplex cinema, Bold Tendencies and Frank's rooftop café, and the creation of Peckham Levels.

These experiences are sadly too frequent where development and 'regeneration' descend on neighbourhoods. It is because it is outside-in development, instead of inside-out starting from what is there – eg the buildings, spaces, people, uses, and their potential.

That is information and local knowledge that is essential, but missing from much redevelopment, whether it is housing, or businesses or a mix of both.

Trust cannot be recovered, nor can there be good planning and development, without bringing in this missing local knowledge before any redevelopment begins.

Only a small shift is needed to begin to turn outside-in development to inside-out.

All development should start with the facts. Just a standard baseline recorded before anything starts to change it.

But it has to be an accurate facts baseline.

The only way to get that is to record it and agree it by working with those who know the place intimately – owners, leaseholders and tenants, users of the activities, nearby places, local people affected by the activities, and the social infrastructure holding them all together.

Neighbourhoods are not just physical places to be redeveloped, they are a living system made up of people in places.

This living system of multiple interactions is forever present, alongside the macro world of corporate organisations which are the big beasts in the human social eco-system.

The community system is visible usually only in the micro world of people interactions which is its life blood and nervous system. It

be- comes visible to the macro world when it is disturbed, like rolling over a stone from the soil and seeing the teeming life revealed.

The current public health emergency is such a disturbance revealing the community capacity to create new forms and processes like Mutual Aid groups and similar everywhere like an immune system defending its organism.

When development descends on neighbourhoods as an outside-in force, the organism will attempt to defend itself.

How

much better it will be if we can shift to inside-out development and start from a mutually agreed fact-based audit of the baseline of the living neighbourhood.

Let us make this part of the new normal as we emerge from the public health emergency. I hope that

Grosvenor's new Community Charter will be a means to begin to establish fact based audits and inside-out development as part of that new normal.



People enjoy themselves at Peckham Levels



Chilling out at the Bussey building

Eileen Conn