

Table of Contents

- [1. Written Statement on the New Southwark Plan in Response to The Inspector's Comments](#)
 - [1.1. Basis of this Statement](#)
 - [1.2. Objective of this Statement](#)
 - [1.3. SP1b Southwark's Places](#)
 - [1.4. National Planning Policy Framework, February 2019 Revised \(NPPF\)](#)
 - [Paragraph 24](#)
 - [Paragraph 32](#)
 - [Paragraph 39](#)
 - [Paragraph 85](#)
 - [Paragraph 102](#)
 - [1.5. Supplemental Observations](#)
 - [History of lobbying for a local centre designation](#)
 - [Spatial context in the Borough.](#)
 - [The Threat of Permitted Development](#)
 - [Loss of shared community space](#)
 - [Loss of local employment, meaning increased commute times for locals](#)
 - [Likelihood of increase of cars owned locally, due to new residents in converted shops owning cars.](#)
 - [Lack of scope to test viability of local shops by adjusting parking policy, due to the lack of a protective designation - Catch 22](#)

1 Written Statement on the New Southwark Plan in Response to The Inspector's Comments

1.1 Basis of this Statement

This statement is a response to observations by the Inspector querying whether the spatial strategy in matter SP1 is fully consistent with the London Plan and National Planning Policy Framework.

This statement relates to the omission of Camberwell New Road as a new "local centre" designation, called CNRLC in this Statement. CNRLC falls outside the purview of existing plans, including the Camberwell Area Plan, whose edge of centre boundary falls approximately 400 metres short of the proposed area.

This omission will be referred to as OOCNRLC (The "Omission Of Camberwell New Road Local Centre") in this Statement.

Because the Statement deals with an item that is absent from the New Southwark Plan, the main points relate to high-level planning principles and benefits applicable, so make reference to the National Planning Policy Framework rather than specific Southwark Plan provisions, other than SP1b (Places).

1.2 Objective of this Statement

This statement seeks to obtain the creation of a new "local centre" designation for Camberwell New Road, with the following wording, or similar:

"Camberwell New Road local centre (CNR) is a clustering of three shopping parades, seven schools, six churches and several warehouse artist studios. CNR has a significant amount of through traffic from all modes, and is an area widely visited for a range of purposes from education to trade, art and worship.

It has a rich history going back to the creation of a parade of shops built in to the creation of Camberwell New Road, and subsequent growth of industrial space, more recently artist studios.

It is an excellent example of living heritage, with shops still trading with their original use as designed in Georgian times, as well as a chance to link the borough with new communities in 9 Elms and Oval Quarter, and to encourage modal shift in this area of high deprivation."

1.3 SP1b Southwark's Places

I support the comments of Mike Wilson (NSPPSV495.2) for this section.:

"1. A definition of effective neighbourhoods & places Under SP1b "Southwark's Places" the plan rightly sets out an aspiration "to strengthen the distinctive network of diverse places so that they will continue to be successful and vibrant as part of the overall plan for Southwark". This is followed through in a sequence of Area Plans for specific areas but there is not, as yet, an adequate description or evidence base for the core ingredients or shared characteristics of neighbourhoods that would mark them out as successful and vibrant.

I believe CNRLC fulfils the simple task of recognising the existence of a cluster of shops, schools and churches which form a community, in order to plan for it as an area which is visited, and which has non-residential uses that require consideration in day-to-day planning activities, including planning applications, cycle rack installations and parking reviews.

CNRLC is formed of two shopping parades which are linked by a back street (Farmer's Road) which is mainly commercial, being the studios and offices of Anish Kapoor and other artists.

CNRLC falls outside the Camberwell Area Plan borders and does not benefit from protected shopping frontage designations. Although these have been promised in the past, nothing materialised.

1.4 National Planning Policy Framework, February 2019 Revised (NPPF)

References to paragraphs are to paragraphs in this section of the Statement are to paragraphs in the NPPF.

Paragraph 24

- Maintaining Effective Cooperation

"24: Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries."

A conversation has not taken place with opposite numbers in Lambeth Council on whether Camberwell New Road should be designated a local centre. As the shops lie exactly on the border, and there is a pub on the Lambeth side which can be considered as part of the centre, this should be done to give fair consideration to the importance of the designation and its spatial context across both boroughs.

CNRLC would provide a framework for cross-borough cooperation in this area, therefore OOCNRLC is UNSOUND.

Paragraph 32

- Preparing and reviewing plans

"32. Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements¹⁷. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."

No review has been conducted of the effect of not recognising Camberwell New Road's non-residential uses on livelihoods, access to services, local identity or walking and cycling habits.

Permission has been granted for shops to be converted to residential while traders are still trading, without an investigation into achievable rents or local visitor infrastructure. An example is the conversion of Marche d'Abidjan on Wyndham Road in 2014, which was a French African business. Its loss had negative impacts on both the shopkeeper and those who relied on her goods for day-to-day needs.

The creation of a new local centre would create safeguards for trading businesses including fair evaluation of rent and visitor infrastructure, so OOCNRLC is UNSOUND.

- Preparing and reviewing plans

"33. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary¹⁸. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local

housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future."

Planning Policy officers were asked to investigate the possibility of designating Camberwell New Road as a local centre in 2017 by Councillor Kieron Williams, at my request. They replied that it did not qualify, but did not provide reasons why.

I believe one reason for this refusal and lack of explanation is that no internal procedure exists in the Council for conducting spatial strategy reviews at the required cadence of 5 years, and that reliance is placed on the expertise of consultants at the point of commissioning retail studies for the specific purpose of preparing local plans.

Specifically, I believe there is no example of a request by an individual or community group for the creation of a new local centre as part of an interim plan review which has been considered as suggested in Paragraph 33, and that the only substantive changes at this level have taken place as the result of decisions by external consultants. This apparent absence of a process, and lack of transparent decision-making, means OOCNRLC is UNSOUND and not POSITIVELY PREPARED.

Paragraph 39

- Pre-application engagement and front-loading

"39. Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community."

In not being receptive to an open discussion on the possible merits of a local centre designation here, the Plan has not taken advantage of the opportunities for early engagement to improve planning effectiveness (See example for paragraph 33 above).

Paragraph 85

- Ensuring the vitality of town centres

"85. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

a) define a network and hierarchy of town centres and promote their long-term vitality and viability - by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;

d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated

needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;"

- Inconsistency with sub-paragraphs 85(a), 85(c), 85(d)

a) OOCNRLC does not allow growth, diversity and adaptation, including an assessment of local visitor infrastructure and demand for local services. Permitting shop conversions on a historic Georgian Parade (225-253 Camberwell New Road) does not recognise the distinctive character of living heritage in terms of facilitating the continuance of the original use of the building, as designed when the road itself was built. NOT POSITIVELY PREPARED.

c) The Plan has not considered Camberwell New Road for retention or enhancement, and has not considered its introduction to formal recognition in the Plan. Therefore OOCNRLC is UNSOUND and not POSITIVELY PREPARED.

d) Town centre boundaries have not been kept under review, in the sense of understanding Camberwell New Road's historic identity as a centre in its own right, outside town centre bounds, and its potential contribution to employment and services, given formal recognition. Therefore OOCNRLC is not justified, and is UNSOUND.

- The Sequential Test

I believe the Southwark Plan over-centralises in giving too much importance to major town centres, rather than walkable shops. In this case it has misinterpreted the Sequential Test (Paragraph 86). The Sequential Test was meant to apply to new development, rather than whether existing and historic commercial areas such as Camberwell New Road should be curated or protected. UNSOUND.

Paragraph 88 specifically exempts small rural areas from the sequential test for the purpose of new development. This common sense approach supports the interpretation that the sequential test should not be used to avoid recognition of significant outerlying historic commercial areas, and that to omit these from spatial strategy designation protection would be disproportionate. UNSOUND.

Paragraph 102

- Promoting Sustainable Transport

"102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;

- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised - for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account - including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places."

CNRLC would enable the above considerations to be made.

The pre-planning process (PPP) for the major housing development aligning Wyndham Road, Redcar Street, Councillor Street and Miah Close, will be used as examples relating to impacts of OOCNRLC.

In other words, a local centre designation would be a simple remedy to ensure the considerations referred to in sub-paragraphs a-e are made.

This is a steering group, with tiered participation for representatives depending on whether being rehoused on the site. The project aims to introduce a further 100 residents on the existing site.

From the beginning of the PPP, I have recommended the involvement of policy officers & shared car ownership operators to explore ways of mitigating the impact of the influx of new residents, with accompanying car storage and deliveries.

However, the position has been that these are things which can be looked at after the development, inconsistent with sub-paragraphs (a), (c), (d) and (e), therefore OOCNRLC is UNSOUND.

A new walking through route was proposed for local consultation, but was watered down by the PPP to a path along a new through road through the development, for groceries deliveries. Because this follows the outline of the development it is indirect and less likely to encourage further walking & cycling trips as a result. Contrary to (c) and (e), as a major missed opportunity to encourage active-travel, particularly in post-pandemic conditions, therefore OOCNRLC is UNSOUND.

1.5 Supplemental Observations

The remainder of this statement is a collection of headings designed to supplement the above points.

History of lobbying for a local centre designation

In the last (2010) Southwark Plan I submitted a proposal to designate Camberwell New Road as a "local centre" in the 2011 Core Strategy. The basis was:

- the area qualified as it has a clustering of shops including a Post Office, several artist studios, several churches and 7 schools
- the NPPF encourages designating new centres to anchor communities and protect communities
- it was a zero cost measure which could be used as a device, even if planners formally disagreed that it should be considered a centre.
- no conflict with existing council policies could be identified.

Since then, I maintained the subject with local councillors and in 2017 Cllr Williams asked the Planning Policy team if the area could qualify. They responded that it could not, but without giving a reason, and without disputing that it qualified according to NPPF guidelines.

In 2014, a shop was converted to residential on Wyndham Road, within the proposed centre. The Planning Officer stated that there was no basis for objecting to lost community services and space, because the shopping area has no protective designations in terms of "protected frontage" or spatial strategy, and falls 200 metres outside the main Camberwell town centre boundary.

In 2016, a shop was converted to residential on Camberwell New Road. In the planning application the applicant stated he had received and rejected a commercial offer to tenant the property within the past year, but had rejected it as it would have meant refurbishing changes to the property, from offices to restaurant. Normally, a property must be empty and without an offer for at least one year, in order to qualify. The Planning Officer stated that there was no basis for objecting to conversion, due to the lack of a protective designation such as CNRLC.

Spatial context in the Borough.

- Avoiding an Amenity Vacuum inside the borough

OOCNRLC creates the prospect of the disappearance of many and possibly all shops in the area, as we move towards a more zone-oriented planning system, where in the absence of a zone, there is no "place".

If this were to occur, the current gaps between amenities would increase, as per the following examples:

- Camberwell Road to Loughborough Junction: 1.5 miles (an increase of 0.5 miles)
- Camberwell Road to Brixton Road: 0.5 miles to 1 mile (increase of 0.5 miles)

These are axes which take in areas of high deprivation according to national ward rankings. These increases follow losses of intermediate shopping parades including Denmark Road by Myatts Fields in the late 1990s.

As a result, this is likely to incentivise car use for those who can afford it (or qualify for a loan), and place those who cannot, into transport poverty and "food deserts".

- The Opportunity to create a stepping stone link from Camberwell to Oval to Vauxhall

This would link up with the new investment and communities on 9 Elms Lane, together with the US Embassy and high-density residential accommodation for individuals of high net worth, with excellent regenerative potential for the middle of the borough. It would encourage community interaction and cross-fertilisation of skills, commerce & service provision.

The Threat of Permitted Development

Increased likelihood of conversion with new planning reforms on PDR, which will be reduced with a local centre designation, since this will:

- create an additional layer of resistance to conversion to residential
- lead to an approach to planning and parking which gives the needs of shops and businesses full consideration, improving the rentable value of shops, so making them less vulnerable to residential conversion.

Loss of shared community space

The loss of shared community spaces also has implications for the loneliness epidemic, resulting in fewer opportunities for the socially-isolated to have regular points of contact with familiar faces. CNRLC would mitigate any loss of shared amenity space, and potentially reverse some existing loss.

Loss of local employment, meaning increased commute times for locals

This will build in further car dependency and reduce opportunities for modal shift, which would otherwise come from CNRLC through the creation and protection of employment.

Likelihood of increase of cars owned locally, due to new residents in converted shops owning cars.

There is a phenomenon of "planning creep", by which car ownership increases due to a steady drip of small-scale conversions from commercial to residential. Only CNRLC can protect against this, as a strategic argument cannot be effectively cited for a small planning application. This was the case with the conversions to residential described above.

CNRLC would create improved trading conditions, making this less likely, and create a reference point for discussions of public interest in terms of the preservation of existing uses, and a greater focus on modal shift.

Lack of scope to test viability of local shops by adjusting parking policy, due to the lack of a protective designation - Catch 22

How do you generate interest in an accurate assessment of viability and local planning policy, without a recognition in the local plan that non-residential uses exist and help to define the area, and integrate its communities?

Because it is within an area designated as a Housing Opportunity area, CNRLC is not treated as a trading area in planning decisions. This means that, away from the red route, permitholder car storage is so dominant that it is even designated outside shopfronts, which blocks access to the kerbside by crossing pedestrians and cargo bikes.

We underestimate how even the smallest change can be a decisive factor in whether locals make decisions to make more journeys by walking.

Returning to the example of the Wyndham & Redcar development above in the discussion of Paragraph 102 NPPF. If we imagine a green walking link from the development and through Farmer's Road, the current parking designation creates an obstruction to that natural walking vector, because it protrudes into the sightline for pedestrians approaching from Wyndham Road. This creates both a physical obstacle, and the impression that the actual distance ahead is longer than it is in reality.

All of this affects footfall - quite literally.

CNRLC would create a framework for the local community to engage in public interest discussions about the true demand for local goods and services and any unnecessary obstacles to trade, creating the prospect of a more accurate assessment of trading viability in the area, than hitherto.

Created: 2021-02-02 Tue 16:52

[Validate](#)