

Your name	Claire Hegarty RIBA Independent Chair PHRP
Organisation Name	Peckham Heritage Regeneration Partnership (PHRP)
EiP Hearing Matter No.	Matter No.10 Issue 13
Specific Strategy, Policy or Question	NSP 71 – Aylesham Centre and Peckham Bus Station Q10.86
Date / time for NSP EIP	Tuesday 23 March AM
The test of soundness the plan fails	<p>The policy is not justified because:</p> <ul style="list-style-type: none"> - it is not based on proportionate evidence justifying a tall building on this site. - It is not an appropriate strategy as it does not address the relationship between tall buildings, indicative capacity and public space. <p>This policy is not positively prepared because:</p> <ul style="list-style-type: none"> - there has been an ongoing community consultation deficit on the issues of the tall building which can be traced back to preparation of the Core Strategy in 2010. - there has been inadequate consultation on the Site Methodology Paper

Aylesham Site NSP 71

Q 10.86 Does heritage and townscape assessment of the site in the Peckham and Nunhead Area Action Plan (PNAAP 26), which concluded that development of up to 20 storeys could be appropriate in this location, remain valid in justifying the NSP approach to tall buildings on this site?

My previous written representation on NSP 71 referred to the unsound policies for this site with reference to Policies P16 (Tall Buildings), and IP7 (Community Consultation).

I note that the absence of tall buildings guidance in the clean version of the NSP was an omission.

Overview of Q 10.86

The Inspector's Question above specifically addresses the heritage and townscape assessment of the site in PNAAP 26 in relation to the NSP approach to tall buildings. In my opinion, the heritage and townscape assessment of the site, as set out in PNAAP 26, does not remain valid in justifying the NSP approach to a tall building (up to 20 storeys) on the site. NSP 71 is therefore unsound for the following reasons:

1. It is not based on proportionate evidence

1.1 PNAAP 26 states that new development is expected to generally *"be no taller than the existing heights"*, (4.7.20), and also refers to the sensitivities of views and settings and the Rye Lane Peckham and Peckham Hill Street Conservation Areas. But these statements are set alongside an argument for the potential of a taller building to *'help regenerate and mark the significance of Peckham'* (4.7.21).

1.2 I can find no evidence for the supposed transformative impact of a tall building. How exactly does a tall building *per se* mark the significance of Peckham? Peckham already has a wealth of well-designed prominent landmark buildings, which mark its civic history and significance as a town centre (for example, the Jones and Higgins building and Peckham Library (4.7.21).

1.3 The ambiguous justifications for a tall building is amplified by the absence of the site in the Figure 4: Tall Buildings map (page 106 of the submission version).

2. It is not an appropriate strategy

2.1 While PNAAP 26 suggests that *'taller landmark buildings help regenerate and mark the significance of Peckham'*, (4.7.21) it goes on to state that *"only buildings of 'exceptional design' have this impact* (4.7.26). In contrast, Witcombe Point is identified as *'not contributing positively to enhancing the local character'* because of its *'scale, massing and design'*, as well as *'the lack of useable public realm'*. (4.7.22)

2.2 While the merits of Witcombe Point can be debated further, the linking of scale, massing and design of a tall building with the quality of the public realm is vitally important in itself, and also links to the issue of indicative capacity for residential development on the site. Indicative capacity is clearly a factor in determining building height. Here again, there is ambiguity between PNAAP 26 Building Heights, and the

later NSP 71. PNAAP 1 states an Indicative Residential Capacity of 400 units. NSP 71 (August 2020 version) states an indicative capacity of 850 homes

2.3 Within PNAAP1 / PNAAP26 there is further ambiguity: combined, do these policies envisage 400 units plus a building up to 20 storeys or inclusive of such a building?.

3. It is not positively prepared

3.1 I have been working with the PHRP since 2016, and in that time, local people in Peckham have consistently reported that they do not feel they were adequately consulted on the townscape assessment in PNAAP 26, which lead to the guidance that a tall building may be appropriate. This community consultation deficit appears to have originated in the 2010 Core Strategy process, and there were significant objections to this policy when the PNAAP was later adopted. Local people also report on a consultation deficit on the Site Methodology Paper, from which indicative capacities of site allocations are derived. My overall sense is that there has been a decade long consultation deficit around this site.

4. Local evidence: current real life planning scenario

4.1 Several issues raised in this statement have been crystallised in the community response to a proposed scheme for this site presented by Tiger Developments in late July 2020. This proposed mixed use scheme comprised of a tall building, and other residential blocks, and contained 920 + homes alongside retail space, a new bus exchange and a new supermarket.

4.2 Notwithstanding the ongoing discussion around this proposal, it is relevant to report that the real life implications of the current indicative capacity plus tall building site allocation are to create a development which:

- has poor quality public space,
- has a density which is out of character with its context adjacent to Peckham town centre and three conservation areas.
- has been rejected by the local community, who have called for further consultation.

5. Suggestions for improving NSP71:

I would suggest that the problems noted above are resolved by:

- a consultation review process on decision making on tall buildings and site capacity made on this site allocation since 2010
- an adoption of one of the fundamental townscape observations in PNAAP 26 that “*we would expect new developments to generally be no taller than the existing heights*” (4.7.20)

Your name	Claire Hegarty RIBA Independent Chair PHRP
Organisation Name	Peckham Heritage Regeneration Partnership (PHRP)
EiP Hearing Matter No.	Matter No. 10 Issue 13
Specific Strategy, Policy or Question	NSP 72 – Blackpool Road Business Park Q 10.89
Date / time for NSP EIP	Thursday 4 March AM
The test of soundness the plan fails	<p>The policy is not justified because:</p> <ul style="list-style-type: none"> - it fails to acknowledge the cultural and community significance of the Old Mill Building and the other heritage assets on and in proximity to the site. - It fails to clearly state the Old Mill Building should be protected and enhanced - It fails to clarify the acceptable height for taller buildings to the north of the site.

Q 10.89 Is the Policy for NSP72 effective in enabling the site to come forward in a comprehensive and viable form?

I have previously stated my opinion that the Old Mill Building is a strong candidate for local listing, both as an example of Victorian industrial heritage and as a valued community space.

This site allocation is ambiguous about the value of the Old Mill Building, and the benefits of enhancing and expressing the spatial relationship between the Old Mill Building, other heritage assets, and the railway viaduct outside the site to the northeast. It should also be clearly stated that the setting of the Old Mill Building must be protected and enhanced.

Clearer information is also needed on what is an acceptable height for 'taller' buildings, which the guidance advises should be to the north of the site.