

Name Clyde Watson

Date for NSP EIP March 23rd 2021

PECKHAM SITES
NSP71 The Aylesham Site

10.83 Is the site developable during the plan period? Is the bus station facility on the site required to be accommodated as part of the redevelopment and is the policy justified in seeking 'small business space' in lieu of any bus infrastructure?

This is an outline response dealing with the question in three parts.

This is presumably a reference to the stated possibilities of providing 'meanwhile uses' in the car park. Given the potential blight and uncertainty hanging over a development period of up to ten years it would seem a very good opportunity to allow for temporary uses. In addition there are major possibilities for provisional uses that may suggest a more permanent infrastructure.

The NSP is uncertain over whether TfL foresees a permanent bus station. The available evidence suggests the bus station is regarded as a major hub in the local network and contributes to a very good PTAL rating. (although see 10.84 below.) It seems clear the bus station should be retained.

In principle any surplus space could be given over to 'small business space' but not at the expense of bus infrastructure,

Although none of the above are strictly policies as expressly stated in the NSP, they all raise supplementary issues arising out of the project. To that extent they can be considered appropriate strategies. However at this stage it is difficult to say if they could be deliverable over the period of the proposal.

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PECKHAM SITES
NSP71 The Aylesham Site

10.84 Does the allocation make the most of the opportunity to reduce the quantum of car parking on the site given its PTAL rating?

This question raises many other aspects of the site allocations in the NSP, as well as PTAL figures and actual car reducing policies for the site. The data is not currently to hand so this can only be a provisional response.

For these purposes it is presumed that the Plan calls for a reduction in car usage within the town centre and assumes any deficit can be met by immediate access to bus or possibly rail services. It is also presumed that the NSP is suggesting the size of what will mainly be the supermarket and associated car parking will be less than at present. Whether it would be 'making the most of the opportunity' is strictly impossible to answer.

On the face of it, this suggests a gross misunderstanding of the nature of supermarket shopping. Whilst seemingly it is a desirable objective to reduce car dependency, large retail spaces usually seek ever-expanding retail opportunities requiring car parking to match. Is it possible the supermarket will try and prioritise access for the new residents on its doorstep and make it less attractive for everyone else? On the face of it these objectives are mutually exclusive.

For these purposes the PTAL rating must be largely irrelevant. By its nature most local supermarket shopping involves heavy and bulky goods and that a large proportion requires car use. It would be useful to know the extent of parking uses in connection with other shops though. This data is currently not to hand. Nevertheless it is suggested there may be possibilities for encouraging shared cab use and online delivery services but these may have a limited impact, although they could be offered as free services.

These questions are connected with other long-term matters concerning retail both in general and particular. In some projections it will be a world of discount shops, nail bars and tattoo parlours. Where do supermarket chains fit into this? What is the long-term impact on shopping habits? What is the 'experiential' nature of supermarket shopping? How does this relate to the future of the motor car in the town centre?

It is therefore suggested that the question as posed above is difficult to answer, and this in turn suggests it is not prepared positively, is not justified and not

effective in achieving its goals. On the other hand it deals with a vital ingredient of the site. It is therefore suggested it is rephrased as a question of conditional preferences that directly confronts policy issues of global warming with a more immediate need to deliver a convenient and sustainable form of retail experience.

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NSP72 Blackpool Road Business Park

10.89 Is the policy for NSP72 effective in enabling the site to come forward in an effective and viable manner?

Previous written statements have highlighted the failure to meet the basic requirements of soundness at every level. These are summarised and elaborated as follows.

Planning Use Classes These require amendment in line with new categories.

Existing Residents, Owners and Users None of these stakeholders appear to have been consulted as to their existing needs, or future aspirations.

Existing Uses and buildings The information is inadequate and misleading. There is no information on employment or exact functions of some of the existing buildings. Assumptions about relocation are inadequate or non-existing. Examples include the TfL Garage and the residential hostel at 86-96 Copeland Rd. There is ambiguity surrounding the Old Mill Building. On the one hand it is described as a local historical asset that needs conserving yet no recognition as to how this might be achieved in practice.

Townscape and Building Context There is no attempt to identify this land in its physical setting. Is it part of the town centre or a distinct residential area? Or what is its potential for small industrial usage?

Adjacent Uses There is no evidence of any attempt to audit peripheral uses to assess the impact of a comprehensive development on this site. Nor indeed does there appear to be any understanding of the ways that the existing local environment might affect new development.

A Proper Vision

The proposal is neither effective nor viable. The above is clear evidence of a comprehensive lack of soundness, indicating the thinking behind the preparation is neither positive, justified nor effective. Notwithstanding the above, an added point is that with foresight and imagination, this parcel of land could be designated and developed as an exemplar of inner urban building.

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Name Clyde Watson

Date for NSP EIP March 23rd 2021

NSP73 Land between the Railway Arches (East of Rye Lane)

10.90 Would the Policy for NSP73 facilitate effective and deliverable regeneration of this site? Is there a realistic potential for the site to accommodate residential development as part of a mix of uses?

1.00 INTRODUCTION

The NSP proposals are clearly aimed at a local oriented space providing a mix of small-scale businesses, cultural leisure and retail elements. Its local community elements are suggested by reference to the possibility of a market and as the start point of a projected pedestrian route linking the town centre with Queens Road Peckham station, a proposal known as the Peckham Coal Line. The proposals are aimed at strengthening the local economy including cultural and social connections and also supporting and introducing physical links with adjoining areas.

It is noted that representations have been submitted by a third party which has a substantial land interest in the site, and which seek to substantially modify the site requirements and design guidance provisions. Specifically it calls for the provision of residential development to be added to the list of acceptable uses allocations.

It is hereby submitted that subject to detailed considerations the NSP policies are feasible and positive aspirations and should be supported. It is further submitted that to introduce a residential component would threaten these ambitions as well as being unacceptable in their own terms.

2,00 THE SITE AND ITS CONSTRAINTS.

2.1 Much of the land is taken up with a railway viaduct to the north and a railway embankment to the south. In addition the latter takes in land previously occupied by abandoned railway sidings, the original coal line. This railway embankment is approximately 30 metres wide at this point and constrained by a high concrete retaining wall.

2.2 The site available for development lies between the rail lines comprises a narrow piece of land approx. 0.75 ha. which tapers to a point at the east end where the lines cross, but which is linked via various arches to Clayton Road which is the principal vehicular entrance. Most of the site is currently occupied by a scaffold yard.

2.3 The west end adjoining Rye Lane is terminated by a three storey commercial building in Art Deco style no 117-127 Rye Lane and that is currently occupied by retail uses at ground floor level and a church on the upper floors. Both this building and the rail infrastructure are deemed to be local heritage assets.

3.00 THE POLICY AND PRACTICAL IMPLICATIONS

3.1 The site requirements draw attention to employment and retail opportunities that are quite modest but take into account the long tapering nature of the developable section of land and are easily capable of being integrated by the existing structures on the site. The arches themselves, about thirty in total lend themselves to retail and small business use as does the space within the 117-127 Rye Lane structure

3.2 It must be emphasised the site lies in the heart of the centre of Rye Lane and any regeneration plans should reflect and reinforce this, both in terms of planning uses and also the available built environment, Not only is the land directly opposite the station square currently under construction but has further potential links. These cover opening up pathways to the Levels development of the Multi-storey car park on the north side and also potentially to the Copeland Park complex to the south. Although hypothetical at this stage owing to the embankment acting as a physical barrier, the latter proposal has been referred to in the PNAAP and is shown in the present plan by indicative arrows.

3.3 The other connectivity link is the Coal Line that is likely to become a prime use on the site. Its virtue is that it is more than merely a pedestrian/cyclist route but the generator of multiple uses along the route. The Peckham end is intended to be a major focus and the site requirements refers to community uses in recognition of this. It should be noted that funding has recently been secured to enable works to commence at the Queens Road end of the route.

3.4 The potential for these connections to act as catalyst for locally based regeneration cannot be over-emphasised. For that reason alone the proposed site allocations should be maintained and strengthened.

3.5 Due to its enclosure by the railway viaduct and embankment, the outdoor space is mostly undevelopable for activities involving permanent buildings, On the other hand it represents perfect opportunities for temporary and ad hoc structures of an impermanent nature. There is no major outdoor market in Peckham at present and this is an ideal possibility

4.00 RESIDENTIAL DEVELOPMENT

4.1 New Ownership. Since 2019 development rights to the arches have been held by an alternative party. This also takes in the open yard between the viaduct and the embankment as well as the art deco building on Rye Lane. There appears to be

only a limited amount of open land still owned by Network Rail. The new rights owners seek to amend the NSP allocations policies to facilitate residential development. For the reasons set out below this should be vigorously contested.

4.2 Land configuration. From the above description it will be noted that site is long and of diminishing width. Its developable extent is further reduced by the need to enable public access to the arches under the viaduct. It is suggested this effectively reduces the possibility of residential development very considerably and makes it virtually impossible at the east end. In addition the entire site is enclosed by a high viaduct wall on the north side up to 6 metres high, and by a concrete wall to the south side. This solid enclosure in itself will render the site mostly unattractive for residential use.

4.3 Conflict of uses. A mix of homes and community activities will be difficult to accommodate on such a constricted site. There would be inevitable clashes between out of normal hours uses and residential use.

4.4 Rail track acoustics The juxtaposition of rail traffic and housing is certain to generate incompatibilities. Although it is possible to reduce some of the effects of train noise and vibration, there is the additional impact of rail/wheel friction due to the railway tracks on the north side negotiating both gradient and curvature. These produce an effect commonly known as 'wheel squeal' and is generally impossible to mitigate.

4.5 Tall buildings and disposition of housing The proposed allocations are silent on the question of tall buildings and it was presumably assumed proposed uses would all be low rise. Because of the constraints both at the narrow land to the east and the juxtaposition with 117-125 Rye Lane, the only developable part of the site would be the central area effectively prohibiting other uses at this point.

4.6 117 -127 Rye Lane and the church This is one of a small group of commercial buildings built or designed in the 1930s. The church use is protected by NSP policy 46 in its current location but it is understood to be under threat by the new ground landlord. Although not listed, the building is judged to be a local community heritage asset, a position likely to be more widely acknowledged when the new station square is completed on the opposite side of Rye Lane. This enhanced status and the opportunities that go with them but are likely to be threatened by a commercial development of this magnitude.

4.7 Peckham Coal Line and pedestrian links The Coal Line has the potential to become a major Agent of Change in the development of the town centre. At present the detail disposition of routes, ramps and steps remains to be fixed and at this stage the maximum flexibility should be allowed for. It has been suggested that the high level route on the original coal sidings is removed from the Plan and the Coal line simply signposted as part of a residential path at ground level. As one of the main points of the proposal this is unacceptable. Similar considerations apply to the suggestion that the southern link beneath the embankment is removed.

5.00 CONCLUSION

For all the above reasons it is hereby proposed that the development as set out in the NSP represents a positive contribution to the need to enhance the public realm. This is especially important in the centre of Rye Lane that already has a particular identity. There is much evidence to suggest that small-scale opportunities that are local and readily achievable, also promote adaptation and change. The scheme has the potential to enable effective and deliverable regeneration of the site and its surroundings. It is therefore suggested this proposal is positive, justified and effective, and therefore is sound within the meaning of the EiP.

It is furthermore submitted that the idea of extending the allocations to allow residential development on this site in any form would be detrimental to achieving any of the above ambitions. In addition to threatening and compromising them, it is suggested that residential uses in their own terms would be environmentally unsustainable and an inefficient planning use of this land. It is therefore suggested this aspect would be negative, unjustified and ineffective, and would render the allocations unsound.

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28:01:21

Name Clyde Watson

Date for NSP EIP March 23rd 2021

NSP74. Copeland Park + Bournemouth Rd.

10.91 Is the site developable against the requirements and guidelines set out in the policy? Is the site alternatively allocated in the Peckham and Nunhead Area Action Plan (PNAAP)? If so, would the PNAAP allocation be rescinded on the adoption of the NSP?

1.00 Requirements and guidelines

The NSP calls for mixed town centre uses covering residential, employment floor-space, retail uses, cultural leisure and community uses and public realm improvements. Some of these uses are already present and the assumption is they should be supported and reinforced where possible. There seems to be no suggestion that they should be displaced as such. The major new elements are residential and large retail spaces. There is no specific guidance suggesting how these could be integrated within the site boundary nor any suggestion as to whether they would change the setting or character of the site. But no matter. It will be an interesting challenge and at this stage there is no reason to suppose it would be undevelopable.

2.00 Description of the site

An interesting characteristic of the site is that it is essentially landlocked. Although bordered by Rye Lane to the west, the main part of Copeland Park is not readily accessible as it is surrounded by separate commercial and residential buildings in Rye Lane itself, the railway embankment to the north and Local Authority offices on Bournemouth Rd. This sense of isolation does not appear to have been an impediment to the success of Copeland Park and the design guidance notes refer quite rightly to the site offering a variety of options.

3.00 Links, routes and permeability

A wider point is made that stresses pedestrian links and permeability and any understanding of the likely future of the site should recognise this. The main aspects include direct access to Rye Lane, and providing links through the railway embankment to connect with the land between the arches. Although hypothetical at the present time, these aspirations should be upheld within the context of the NSP. Apart from the financial obstacles to building these links,

development options should also recognise that the bulk of the land is in single private ownership with resulting issues of access and security.

4.00 The wider context

A key insight into the future prospects of Copeland Park lies in the relationship with adjacent sites, most of which have proposed public uses. This starts with the Aylesham site and recognises the connection via Cerise Rd to the temporary creative uses within the former multi storey car park, aka The Levels. There are then direct connections with the Arches site including the Peckham Coal Line. The Arches site then reflects the station square currently under construction to the west and suggests the subway link to Copeland Park. Copeland Park is also adjacent to the proposed Business Park at Blackpool Rd. In addition to a N-S vertical spine paralleling Rye Lane there are lateral links east and west

These are mostly paper aspirations at the present time but could prove exciting opportunities and challenges for the future development of the town centre, shifting the focus away from Rye Lane.

5.00 Differences between the PNAAP and the NSP

The question draws attention to the PNAAP allocation for the site and appears to ask if it should be rescinded assuming the NSP allocation is accepted. From strict comparison it is clear that the NSP allocation follows the PNAAP document with minor differences of nuance and emphasis.

The differences are a reference to student housing in the NPAAP version, now deleted and precise areas for different uses noted which are now omitted. On that basis the NSP gives more flexibility to area allocations and strictly the PNAAP version could be rescinded.

6.00 Conclusion

There is much detail still to be worked out in the NSP allocation but in principle the allocation is sound and deliverable.

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