

Name	Paula Orr
EiP Hearing Matter no	Matter 10
Section	Issue 13
Specific Strategy, Policy or Question	Site Allocations NSP71 and NSP72
Test of soundness failed	NSP71: Not justified; not positively prepared. NSP72: Not justified; not positively prepared; not effective; not consistent with national policies

NAME: PAULA ORR

MATTER 10, ISSUE 13

Issue 13:

Whether the Peckham sites are justified, effective, consistent with national policy and in general conformity with the London Plan.

SITE ALLOCATION NUMBER: NSP71 - Aylesham Centre and Peckham Bus Station

10.83 What evidence and assumptions of density/building heights have informed the indicative capacity of the site to accommodate a mix of uses including some 850 new homes? Is the indicative capacity reflective of the site's location within the Borough View of St Paul's Cathedral from One Tree Hill?

I consider that the lack of evidence put forward to support discussion of the issue of densification and increased building heights in proximity to the Rye Lane Conservation Area makes Site Allocation NSP71 unsound. Increasing activity in Peckham Town Centre and evidence about the importance of green and open space in supporting mental health outcomes should raise questions about the density levels proposed as the basis of a public discussion of the best approach to the development of this strategic area. This has not happened.

The plans that have been in development for the site over the past three years include a dense urban structure with six-storey buildings on Rye Lane, which are double the height of the existing buildings and the buildings opposite. Building heights are then 'stepped up', culminating in a tall building of at least 20 storeys. The open areas between buildings are wide, but will have limited light given the height of the surrounding buildings and will not provide any natural areas for recreation and socialising. This densification is not supported by evidence considered for the PNAAP or any subsequent evidence.

This will have a negative impact on residents and users of the sight and also on the enjoyment of the Borough View of St Paul's from One Tree Hill. While the height of the buildings may not obstruct the view of St Pauls, they create a border of dense construction which alters the experience of the view.

10.84 Is the policy justified in requiring intermediate affordable housing to be provided through a community land trust?

Community Land Trusts are a form of community-led housing. The community should be integrally involved throughout the process in key decisions like what is provided, where, and for whom. The benefits of the scheme to the local area and to any specified community group should be clearly defined and legally protected in perpetuity.

There is insufficient evidence on the characteristics of the CLT on the Aylesham Centre and the type of housing it will provide. The site appears to only provide homes to buy (at discount) and no social rent. 59.3% of households in Peckham ward are in social housing; 25.2% in Peckham Rye ward (SP104 - [Southwark Housing Strategy to 2043, 2015](#)). I support of the CLT model in principle but would expect a CLT in Peckham to provide benefits to the local area in the form of some social rented accommodation.

Many CLT groups are considering how they can make their communities more sustainable by generating renewable energy. A community owned renewable energy project on this site would contribute to meeting net zero carbon emissions target (Southwark Council's declaration of a Climate Emergency, 2019; UK Government Climate Change Act, 2019) and could potentially raise large sums of money to fund capital costs, without necessarily needing a bank loan. I would like the type of housing to be offered as part of the CLT scheme on the Aylesham Centre site and the potential for the Site allocation to include the requirement for a community-owned renewable energy facility, to be discussed during the hearings.

The lack of consultation on the nature of the housing to be provided indicates that the policy has not been positively prepared and undermines the soundness of the allocation.

SITE ALLOCATION NUMBER NSP72: BLACKPOOL ROAD BUSINESS PARK

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

I do not consider that NSP72 provides an effective way of ensuring the viable and sustainable development of the site.

The description of the site contains errors and inaccuracies:

- In 'existing uses' it appears that area occupied by the Bus Depot (a use later correctly described as Sui Generis) has been included in the total area of B class uses
- The Old Mill Building is a Victorian heritage assets; the site allocation refers to other assets of this kind, but there are none on the site
- The mention of the Peckham Coal Line walking route suggests that the route goes through the site. In fact, the Coal Line is on the far side of the railway line to the north of the site.

These inaccuracies undermine the soundness of the site allocation and suggest that Council planners are not familiar with the site, much less its context and uses. This may explain the lack of understanding of the activities taking place on the site and the needs and opportunities within the local area.

Employment on the site. The southern half of the site (south of Blackpool Road) is mainly occupied by Buildbase builders' merchants. This is industrial floorspace use, which is an important capacity to maintain in order to meet current and future demands for industrial and related functions (London

Plan, 2020, Policy E4). In Southwark, audits carried out by local researchers show that there has been and continues to be significant loss of industrial floorspace to new residential development across the borough (see Written Statement on Matter 5 by Mark Brearley). The Buildbase business on Blackpool Road is used by builders, building management services and many companies requiring building materials such as wood for their products or processes. For example, many of the small businesses based in nearby Copeland Park rely on Buildbase. There is no similar provision in the nearby areas, as there has been a loss of builders' merchants and similar businesses across Southwark. Recent research (see Written Statement on Matter 5 by Mark Brearley) shows that of the 66 builders' merchants in Southwark in May 2018, 18% had been lost (actual + immediate pipeline) by the end of 2020 because of development planning decisions. That is, 12 premises that have been or are facing being displaced, without re-provision, by residential development schemes. Of the remaining 54 premises, NSP would leave some 48 (89%) vulnerable to displacement (one of these is Buildbase). The London Plan (2020) recognises the need to prevent the further loss of industrial land and requires boroughs, including Southwark, to retain the provision of industrial land capacity (London Plan, 2020, Table 6.2).

Proposed change to site allocation

The site allocation should be amended as follows, to reflect the importance of the builders' merchant activity currently provided (new/altered text is shown in **bold**):

Redevelopment of the site must:

- *Provide at least the amount of **industrial floorspace (currently in use as a builders' yard) currently on the site.***
- *Retain or re-provide bus garage (sui generis), subject to need.*

Housing provision on the site

Assuming the retention of the builders' merchants and Bus Depot on the site, there is a need to re-consider the amount and type of housing that could be provided.

Design and accessibility guidance

There is a need for a proper design process to understand current uses of the site and local needs. At three local meetings organised by Peckham Vision in 2019 - 2020, residents identified needs such as new housing provision (and in particular the provision of social housing), with a preference for low-rise housing in keeping with existing provision (e.g. Attwell Estate) and facilities for young people.

The 2020 London Plan (Policy D9) allows boroughs to decide where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. Boroughs should determine and identify locations where tall buildings may be an appropriate form of development and in these locations, determine the maximum height that could be acceptable (para 3.9.2). The site allocation implies (by using the term taller buildings) that a tall building is acceptable on site. However, the most recent map showing where tall buildings are allowed in the NSP does not state Peckham as a suitable area.

There is no evidence that any process has been carried out to assess the suitability of the NSP72 site as the location for a tall building or buildings. If such a process has been carried out, it has failed to involve local businesses or residents. The London Plan recognises that tall buildings can make a

positive contribution to London's cityscape but that they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor quality design. The site allocation uses the term 'taller building' and does not provide any guidance on height.

The proposal to allow tall building to the north of the site would negatively affect the regeneration potential of the Peckham Coal Line walking route which is mentioned in the site allocation. The buildings would be close to the walking route (a raised route on the north side of the railway line, with views south and north), reducing the sense of space and blocking views south to the remains of the Great North Wood at One Tree Hill. The Peckham Coal Line is an important project for increasing walking and attracting visitors to Peckham.

There is also a risk that a tall building or buildings could overshadow and have a negative impact on the Old Mill Building (see below).

The wording of the 'Approach to tall buildings' is imprecise as it does not specify the maximum height of buildings. The site is bordered by residential areas to the west (Attwell Estate made up of two-storey homes), east and south on roads off Consort Road which are mainly individual two-storey homes and some blocks of flats of no more than 6 storeys.

The Tall Buildings Background Paper, July 2020 (EIP54) says that 'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics.' This is not the approach that Southwark Council has taken in relation to the NSP72. Several local residents and businesses have responded to consultations commenting that they were only made aware of the proposed site allocation by Peckham Vision and had not been contacted by Southwark Council. The Council's approach to the development of an approach to tall buildings in the Old Kent Road sets a poor precedent: schemes with very tall buildings have been given planning permission before the OKR Area Action Plan has been agreed – and with no involvement of local community. I propose that NSP72 should be taken out of the NSP to avoid a similar result.

Old Mill Building

The importance of the Old Mill Building as part of Peckham's industrial heritage and as a community hub is supported by 105 responses to a community survey carried out by Peckham Vision between 2018-19. 54 of the total responses came from people living in Peckham (SE15 postcodes). A further 41 came from people living in the wider south east London area. Only 10 responses were from people living outside south east London.

The survey responses show overwhelming support for retention of the building. In response to the question: 'Is this building an important part of Peckham's heritage?', 99 people said Yes and only two people said No (four people did not complete this part of the survey). When asked 'Does this building provide a place for the community to come together?', 101 respondents said Yes and only 1 said No.

People were invited to comment on what was important to them about the building. Responses often mentioned several different things that made the building important. The aspects referred to most frequently related to function of the building as a community hub and place where community activities are held (mentioned by 46 respondents, e.g. "*This building provides a space for the community to come together*"), historical and heritage importance (mentioned by 43 people) and the building's aesthetic and architectural importance (mentioned by 19 people). Other important

characteristics mentioned included: contribution to Peckham's identity, value as a venue for a range of activities and use as a place of worship.

The Questionnaire is attached as Appendix 2.

I consider that any redevelopment of the site must retain the Old Mill Building at 72 Copeland Road and enhance the setting of the railway viaduct.

Transport and traffic

There is no evidence that the area's transport network is capable of increasing to accommodate the increased users from intensified development.

Permeability of the site is affected by serious traffic congestion and poor visibility problems which make the whole of the area between Copeland Road (west), Consort Road (east) and Heaton Road (south) difficult to access or leave by public or private transport, by cycle or on foot. Peckham Vision held four community meetings between 2019-2020 to understand the needs and priorities of local people.

Local residents noted that the area is highly congested and air pollution is a big problem. They mentioned the intersection of Copeland Road and Consort Road as particularly dangerous, especially for pedestrians. Meeting participants commented that if more people moved into the area, these traffic problems were likely to get worse. They said that any future development should involve a review of traffic flow, congestion and safety issues.

Summary

I propose that NSP72 is unsound and should be taken out of the NSP. This would allow for a proper design process to be carried out to understand current uses of the site and local needs and to bring in thinking from the local community.

If the Inspectors disagree that NSP72 is unsound, I consider that the following essential changes should be made, as a minimum, to increase the site allocation's soundness:

- *Clarify that the Bus Depot is classified as Sui Generis and not classified as use class B.*
- *Change of wording to the site allocation to: Provide at least the amount of **industrial floorspace (currently in use as a builders yard) currently on the site.***
- *Provide guidance on height of tall buildings. I would suggest that inserting a new clause under Approach to tall buildings: **Any redevelopment must not exceed a maximum height of 6 stories.***
- *Insert a new clause that any redevelopment of the site must **retain the Old Mill Building at 72 Copeland Road and enhance the setting of the railway viaduct***

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