

Statement of Common Ground between Southwark Council and Eileen Conn

March 2021



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Introduction

This Statement of Common Ground (SCG) addresses matters specific to Southwark Council and Eileen Conn which relate to the Proposed Modifications for site NSP72 Blackpool Road Business Park in the Examination Version of the New Southwark Plan.

This SCG has been prepared by Southwark Council in agreement with Eileen Conn and will be used to inform the contents of the New Southwark Plan.

The purpose of the SCG is for both parties to acknowledge areas of common or uncommon ground relating to the contents of the New Southwark Plan, and to progress in cooperating on the best approach to addressing these areas.

Southwark Council

Southwark Council is the local authority for the London Borough of Southwark in Greater London, England.

Eileen Conn

I have lived in Peckham, SE15 since 1973. As an active resident I coordinate Peckham Vision and Southwark Planning Network which are citizens' groups encouraging and supporting the engagement of local people in planning processes.

Since 2017, I have worked with other members of Peckham Vision to raise awareness and to facilitate discussion about the proposals for NSP72 Blackpool Road Business Park, with people who live and operate businesses in and around the Blackpool Road area. The site is part of the larger site originally designated in the Southwark Plan in 2007 for the cross river tram depot. The campaign against that proposal gave rise to the formation of Peckham Vision in 2006. Peckham Vision, through its studio and its shop unit, is a tenant of Copeland Park which is adjacent to the Blackpool Road site. The proposals and views in this Statement of Common Ground have been formed during those 4 years of discussions. Paula Orr and Clyde Watson who have been actively engaged in that work are participants in the EiP Hearings on 27th April, and have also been party to the discussions on this Statement. We will be informing other local people, who are listed as participants at the hearing, of the Statement.

Strategic Matters

Topic 1: Existing uses

The description of existing uses is inaccurate:

- It doesn't mention the bus garage but only:
 - Business and industrial uses (13,071m²)
 - Builders yards (sui generis)
- Land occupied by the bus garage appears to be included in the 13,071m² of 'business and industrial uses'. However, the bus garage is a sui generis use, as recognised in the 'Site' section.
- No mention of Council Street Works
- No mention of the Old Mill Building which is a community use.
- No mention of the residential hostel at the north side of site
- Note that use classes have changed – the wording needs to be changed to reflect this.

The bus garage needs to be listed separately, showing its floorspace, as it is not a business and industrial use.

We agree that development should provide at least the amount of employment floorspace currently on the site.

We disagree on the amount of employment floorspace to be reprovided. The inaccuracies in the description of existing uses mean that the site allocation is unclear as to what this includes. The employment floorspace calculations on the site allocation document appear to treat the bus depot as employment floorspace. However, given that the bus depot takes up much of the site and is not an industrial use, but parking bays for buses, this floorspace should be excluded from the amount needed to be re-provided on site.

Suggested changes:

- 1. List all the existing uses of the site, correcting the inaccuracies in the current descriptions and listing the bus garage separately.**
- 2. Amend the figure for re-provision of employment floorspace to exclude the bus garage.**

Agreements:

- The existing uses will be updated to reflect the use of the bus garage separately. See updated uses below:

Building	Area sqm	Yard	Area sqm	Totals	Use Class
All buildings excl Bus garage and Old Mill Building	4340.61	All yards excl bus garage yard	5112.47	9453	Employment/ industrial
Bus garage	888.62	Bus garage parking	3533.42	4422	Sui generis
Old Mill Building	424.96	n/a	0.00	850	Community (2 storeys)

- The existing uses also include a small housing block providing temporary accommodation within the site allocation.
- The site allocation states that 'Redevelopment of the site must:...Retain or re-provide bus garage (sui generis), subject to need'. The Bus Garage is not an employment use, the re-provision of employment floorspace would not include the bus garage as this is dealt separately within another clause of the site requirements.

Topic 2: Residential capacity

We agree that the site is suitable for housing, provided this is not in high-rise blocks.

The site allocation states an indicative residential site capacity of 250 homes. This would mean a residential density of 142 dwellings per hectare (dph) *if the whole site were used for housing*, given that the site is 1.758 hectares.

However, the uncertainty about the future of the bus garage makes it impossible to assess the residential capacity of the site, because the bus garage occupies such a large part of the site. The presence or otherwise of the bus garage is a crucial factor that needs to be known in order to decide about residential capacity and the nature of the housing to be provided. There is an opportunity to give more thought to strategic uses while the future of the bus garage is decided.

Suggested change: The site allocation should not specify the number of homes to be provided until the future of the bus garage is clear.

Disagreements:

- The site allocation should not specify the number of homes to be provided until the future of the bus garage is clear.

Topic 3: Design and accessibility guidance

- **Green space**

It is an important principle to consider the provision of green space or green corridors as part of all new development. As there are local parks and green spaces nearby e.g. Harold Moody Park, Consort Park, and given the importance of connectivity for this site, the development plan should indicate where green corridors should be provided, for example as part of the traffic redesign.

Suggested change: There should be a requirement for the development to include green corridors, and also linking them to the Peckham Coal Line.

Agreements:

- Policy P51 states that development must support the implementation of 'Low Line' routes. This site does not contain the Low Line but is adjacent to the Low Line route across Consort Road.
- Policy P58 states that major development must provide green infrastructure with arrangement for long term stewardship and maintenance funding.

- **Traffic**

Local discussions list the unhealthy and dangerous traffic situation as a major issue for this site. The site allocation document does not specify how a new development should resolve this.

The traffic issues are now considerably worse because of the diversion of bus and commercial traffic from Rye Lane for Covid-19 social distancing. This may become a permanent feature.

To be sound the development plan for the site must have an effective accompanying plan for traffic management. Without that it is not compliant with the Council's healthy (and safe) streets policies.

Suggested change: there should be a requirement for a traffic plan for all the north-south and east-west traffic using Copeland Road, Consort Road and Heaton Road to ensure that road infrastructure is improved as part of any redevelopment. Uncertainties about the future of the bus garage on the site and about the long-term pedestrianisation of Rye Lane will need to be taken into account in the traffic plan.

Council Response:

A traffic plan as set out in the suggested change would not be appropriate in the context of the site allocation. The road infrastructure around the site is a strategic highways issue which will be considered, however it would not be appropriate to set this out as a requirement for this site.

Agreements:

- Transport assessments, including a Travel Plan and parking provision statement, are required for all major applications. This should include consideration of sustainable modes of transport in accordance with the London Plan and NPPF.

Disagreements:

- There should be a requirement for a traffic plan for all the north–south and east-west traffic using Copeland Road, Consort Road and Heaton Road to ensure that road infrastructure is improved as part of any redevelopment. Uncertainties about the future of the bus garage on the site and about the long-term pedestrianisation of Rye Lane will need to be taken into account in the traffic plan. traffic as above

Topic 4: Approach to commercial and taller buildings

We disagree that the site allocation proposal is suitable for a tall building and that commercial and taller buildings should be concentrated to the north of the site.

Reasons:

- Tall buildings have not been identified as appropriate for this site allocation.
- The proposal does not take into account the current location of Buildbase as a successful commercial building on the southern half of the site.
- A tall building(s) at the north end of the site would not support the provision and implementation of the Peckham Coal Line as it would block the view south from the Peckham Coal Line.

Given the proximity to the borough’s protected views from Nunhead Cemetery and One Tree Hill, a tall building is not considered appropriate on this site.

We note that the NSP map of sites for tall buildings does not show the Blackpool Road Business Park as a site for a tall building. In addition, the site is not identified within the EIP54 Tall buildings background paper as a site suitable for tall buildings. Overall, a tall building is not considered appropriate for this locality where the vast majority of dwellings are two stories, and this is supported by both the tall buildings map and the background paper which does not mention Blackpool Road as a suitable site. The maximum heights of the most recent developments are 6-7 stories. To be in keeping, and to ensure sunlight is not blocked from neighbouring properties, a maximum height of 6 stories should be added to the site allocation document.

Suggested changes: Remove the reference to ‘taller building’ for this site. Remove the reference to locating commercial buildings at the north end of the site. Set the maximum height for buildings on the site at 6 storeys.

Council Response:

The site does not intersect with the Landmark Viewing Corridor or Wider Setting Consultation Area of One Tree Hill Borough View. Therefore, it is considered that approach of having taller buildings located to the north end of the site is appropriate.

Disagreements:

- Remove the reference to 'taller building' for this site. Remove the reference to locating commercial buildings at the north end of the site. Set the maximum height for buildings on the site at 6 storeys.

Topic 5: Impacts on undesignated heritage assets: Old Mill Building

We welcome the recognition that the Old Mill Building is a heritage asset.

The site allocation document does not specifically state that this building should be protected, stating only that 'the site is in proximity of important undesignated heritage assets such as the railway viaduct and the site contains the Old Mill Building at 72 Copeland Road, which is of local interest'. This provides little protection over the building.

Suggested change: the site allocation document should state that the Old Mill Building specifically must be retained and enhanced and its setting must be enhanced.

Agreements:

- Old Mill building is included in the site allocation map as a building of architectural and historic interest and referenced in the site allocation under undesignated heritage assets as a building of local interest. Policy P20 Conservation of the historic environment and natural heritage states that development must conserve and enhance undesignated heritage assets, and unlisted building of townscape merit.

Disagreement:

The site allocation document should state that the Old Mill Building specifically must be retained and enhanced and its setting must be enhanced.

Topic 6: Low line walking routes

It is welcome that the potential for a walking route along the Peckham Coal Line is recognised in this neighbouring site allocation. There is a lack of clarity in the site allocation document which suggests that the Peckham Coal Line is part of the site under its 'low line walking routes'. This is ambiguous and therefore needs to be better worded. It might be better pointing out that it should be linked to the provision of green corridors on the site.

A taller building(s) on Blackpool Road Business Park would negatively affect the potential for the Peckham Coal Line walking route by interrupting the view towards the south.

Suggested change: the reference to the Peckham Coal Line should be redrafted to make it clear it is not part of the site but close by.

Agreements:

- The reference to the Peckham Coal Line will be amended to:

Development should support the provision and implementation of the adjacent Peckham Coal Line.

Topic 7: Loss of industrial land

Data provided by Vital OKR shows a significant loss of builders merchants premises in Southwark in recent years. Builders merchants are important suppliers for a range of small creative enterprises that have powered the growth of the local economy in Peckham in recent years.

Suggested change: The site allocation must include Buildbase or at the least reprovision on the site for builders merchants.

Agreements:

- Policy P32 Business relocation, states that where existing small or independent businesses or small shops may be displaced by development a business relocation strategy, written in consultation with affected businesses.

Disagreements:

- The site allocation must include Buildbase or at the least reprovision on the site for builders merchants.

Topic 8: Surrounding areas

Within the surrounding area there are a primary school, sheltered housing and residential areas. These will all be severely impacted, either directly or indirectly, by the development of the site. These impacts are not reflected in the current site allocation and therefore are not taken into account in development proposals.

Suggested change: the site allocation should include a requirement that the development should show how it will enhance the surrounding area.

Disagreements:

- The site allocation should include a requirement that the development should show how it will enhance the surrounding area

Signatories

This statement has been informed by engagement between Southwark Council and Eileen Conn, Paula Orr, and Clyde Watson.

'We agree that this statement is an accurate representation of matters discussed and issues agreed upon.

It is agreed that these discussions will inform the New Southwark Plan and that both parties will continue to work together collaboratively in order to meet the duty to cooperate.'

Signed: Eileen Conn

Name: Eileen Conn

Position: Local resident, and
coordinator of Peckham Vision

Date: 1 April 2021

Signed 

Name: Simon Bevan

Position: Director of Planning

Date: 6 April 2021