

RESPONSE TO CONSULTATION ON FURTHER ALTERATIONS TO THE LONDON PLAN

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INTRODUCTION

Peckham Vision is a consortium of individuals who live, work or run a business in Peckham, London SE15. It is run by a small team of local residents who work with other community groups and many individuals who support this work. At its core is a community information and discussion system which is followed by over 2000 on an email network, 1000 on Facebook, and 2,500 on twitter, backed up by a website and blog:

<http://www.peckhamvision.org>
<http://www.facebook.com/PeckhamVision>
<http://twitter.com/PeckhamVision>
<http://peckhamresidents.wordpress.com>

It formed in 2006 in a local campaign for a review of the draft UDP plan to demolish and locate a tram depot on a large site, including the Copeland Industrial Park land, across the road to the south east of Peckham Rye station. In the course of the campaign, Peckham Vision took forward the work of the local residents' Rye Lane & Station Action Group and developed an integrated masterplan idea for the way in which the historic station and the large area of Network Rail land around it linked with the Copeland site. As this central area of Peckham around the station began to realise its potential as a new and growing cluster of creative and cultural enterprises, partly stimulated by the Peckham Vision campaign, the remaining development sites adjacent to the north of the Network Rail land were incorporated into Peckham Vision's integrated masterplan idea. Map 1 is a recent version. This is in continuing development as an aid for information, community education and discussion as in the display panel, copy at Annex A, which is in the Peckham Vision mobile exhibition.



MAP 1. Peckham Vision illustrative masterplan idea for central Rye Lane

COMMENTS ON PROPOSED ALTERATIONS

Overall comments

Our comments on the Further Alterations to the London Plan (FALP) are based on the experience of the last 12 years of our continuous work relating to the development of planning policy for Peckham Town Centre, first in the Unitary Development Plan (UDP) approved in 2007, and then in the Peckham & Nunhead Area Action Plan (PNAAP), first consulted on in 2007. The PNAAP had its EIP in July 2013 and further public consultation on the Inspector's suggested modifications in December 2013/January 2014. The Inspector's report is expected in summer 2014. Since 2005, Peckham Vision has worked very closely with local creative practitioners and entrepreneurs in the growing creative and cultural industries in this central area of Peckham, as well as with the mainstream traders in Rye Lane, the main shopping street.

Peckham town centre is a medium sized centre in south east London 3 miles south of the London Central Activities Zone, and near the edge of outer London. It has changed significantly over the last 40 years. Major factors in this have been demographic changes in its hinterland, changes in the retail sector in the national economy, and more recently modern developments in, and growth of, the creative and cultural sector in the local economy. These give rise to our comments. While they derive from our Peckham experience, we have enough contact with other community groups across London to consider that the factors involved have relevance in similar areas, and therefore have London-wide significance and relevance to the London Plan.

We have been enabled to comment at London level by becoming part of the Just Space Network, which is an invaluable support infrastructure for grassroots small groups and organisations in both the community and the small business sectors. It enables the daily lived experience of the issues relating to planning to begin to be brought together in an appropriate way. This can enhance and enrich the official planning process by beginning to provide a more grounded reality of a large part of the social and economic life of London, often below the radar, in public and commercial policy making.

Chapter 2 London's Places

Policy 2.9 Inner London. Page 52

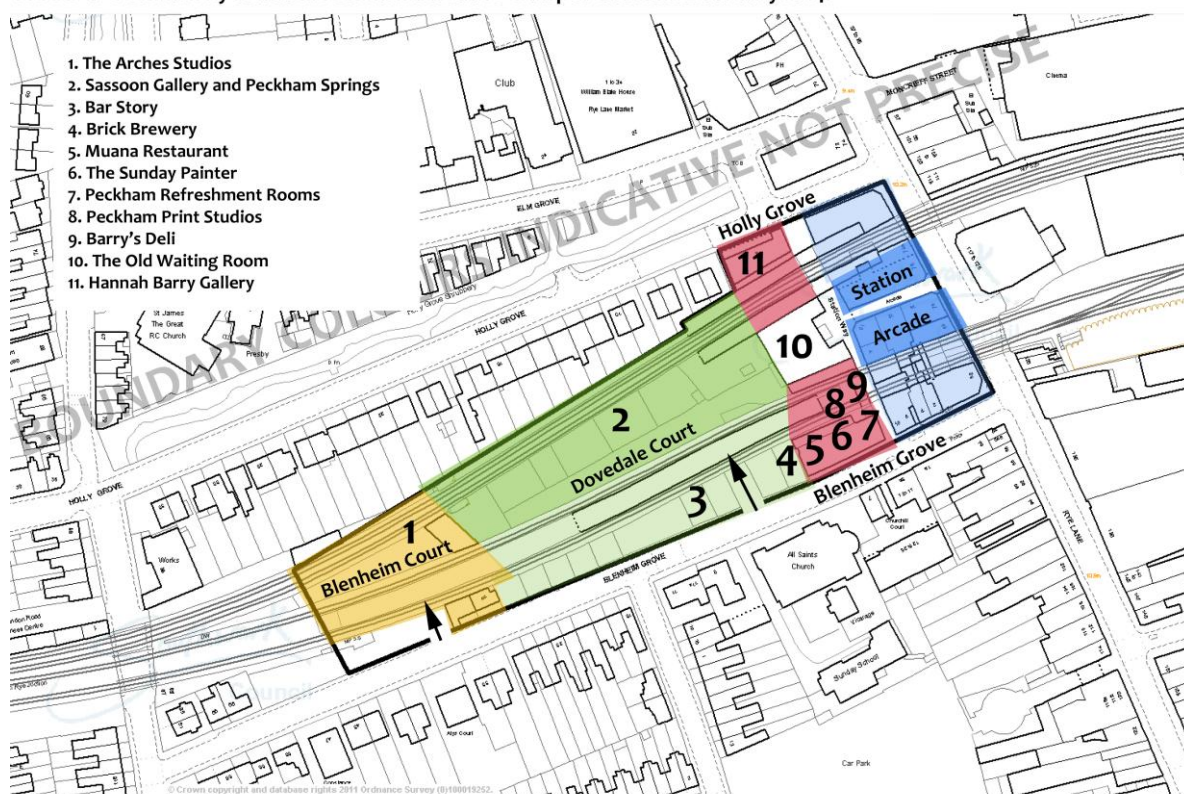
Peckham Vision welcomes the new references in this paragraph to the need to ensure "the availability of appropriate workspaces for the area's changing economy". Our experience has shown us, however, that the Council, developers and large land owners usually have very different interpretations from the local community of what 'appropriate' means.

If the Mayor is to realise one of his economic development policy objectives to "promote London as the world capital of business, the world's top international visitor destination and the world's leading international centre of learning and creativity" (para 4.9), then it is important to protect and support creative and cultural activities and new clusters that are emerging organically in inner London locations, such as Peckham. Changes to para 4.50 also refer to "the contribution to London's economy made by specialist clusters of economic activity". Achieving this means protecting existing spaces that are serving small businesses, many in the creative sector, as well as attending to new affordable workspaces in the context of high value mixed use development and housing. We

therefore propose that Policy 2.9 is reworded to read “ensuring the continued availability of the diversity of existing workspaces to accommodate the area’s changing economy”

Our recommendations are based on the fact that Peckham is home to a growing cluster of creative and cultural enterprises in and around Peckham Rye station, in the central part of Rye Lane the main shopping street. It is a very dynamic part of the local Peckham economy, with far reaching growth potential. Network Rail, however, recently published a ‘Station Gateway’ plan [see peckhamrystation.com] which would destroy a significant part of the cluster of these creative and cultural enterprises. Map 2 shows the location on the Station Gateway site of an increasing number of businesses which are part of the new creative industries sector. Several are recent start-ups.

PNAAP 6 - Peckham Rye station. Peckham’s creative ‘hotspot’ businesses January 2014.



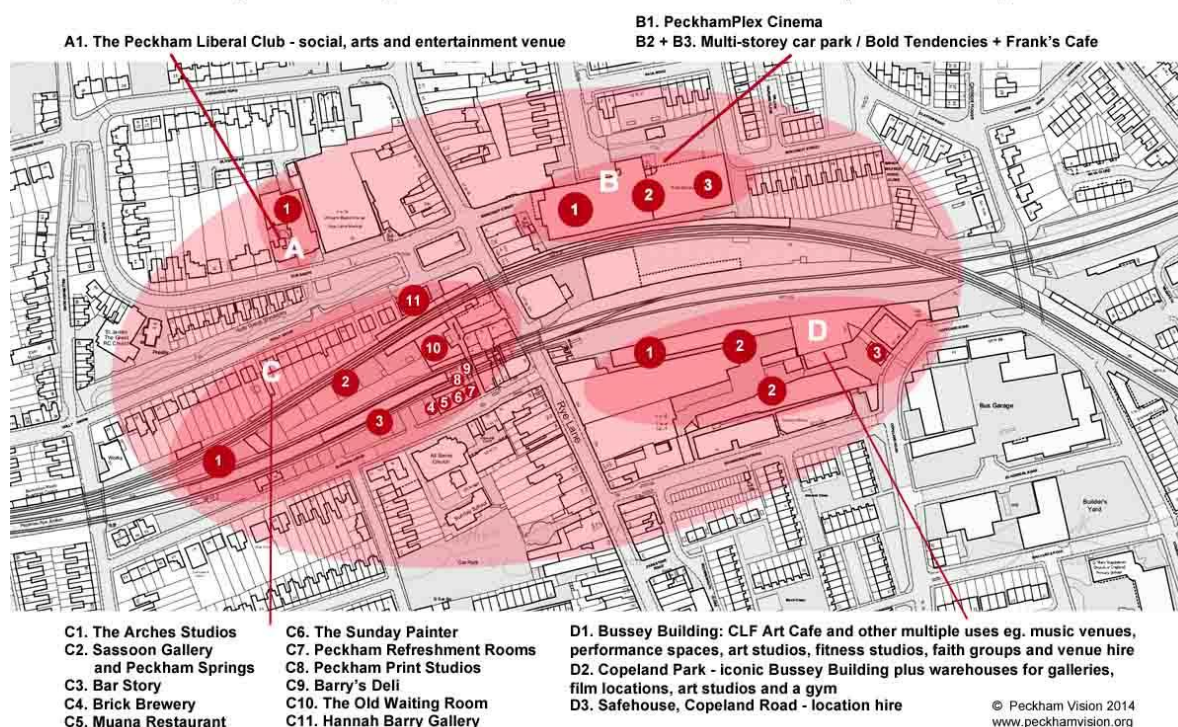
Gateway to Peckham - different parts of Network Rail land, central Rye Lane west
 Base map from Gateway to Peckham Cabinet report <http://modern.gov.southwark.gov.uk/mgAi.aspx?id=27873>
 Boundary colours indicative not precise, produced by Peckham Vision 2013 as a discussion aid

MAP 2. Peckham Rye Station Gateway site – creative & cultural enterprises

The speed of change at street level is fast, and is currently outpacing the public agencies’ understanding of the dynamic. This pace is an indication of the success of this growing cluster of enterprises in the micro economy, that they themselves are self-creating. Peckham has spawned its own self-regeneration process, embracing the Station Gateway site. The site is full of old solid buildings reused for new and creative purposes. The plan would destroy the nature of that site with the old buildings - their adaptability, spirit and low cost - that has helped the self-regenerating process take root and flourish. Network Rail’s proposal would be the death of this on the Peckham Rye station site, and so could threaten the whole cluster’s viability. Widespread local concern from residents and local businesses, to Network Rail’s proposals, has resulted in a short pause to enable the community to take part in a co-design process to produce a more acceptable approach. A key

issue in the failure of the initial development approach has been the absence of a requirement to consider the significance of the existing buildings and land uses for the success of the emerging creative and cultural industries in this location.

Transforming Central Rye Lane: Peckham's creative 'hotspot' January 2014



MAP 3. Central Rye Lane's cluster of creative and cultural enterprises, recycling & re-using old buildings. The map is in the discussion display panel, copy at Annex B, and part of the Peckham Vision mobile exhibition.

An important characteristic of this creative and cultural sector in central Peckham is the close proximity of the growing number of micro enterprises located on four sites clustered around Central Rye Lane. This proximity enables many personal interactions and enterprise connections. Map 3 shows how they cluster around central Rye Lane and the station. Some creative enterprises have long roots in central Peckham. They started some 20 years ago with artisans' workshops in Blenheim Court, and artists' studios in the Bussey building. 9-10 years ago Bar Story then Sassoon Gallery began in Blenheim Grove/Dovedale Court. A few years on, CLF Art Café created a dance, theatre and workshops venue in the Bussey building, Hannah Barry Gallery took root next door in the Copeland Park, and created Bold Tendencies and Frank's Café, in the multi storey car park, which have escalated the growth further. At the same time new creative and cultural enterprises have been growing in the buildings alongside the historic station itself and behind it in Dovedale Court and Blenheim Grove, and in the Copeland Park. More recently, community asset nomination has brought the early Victorian building of the Peckham Liberal Club on the north side of the station into the mix as a significant social and performance venue.

These and many more interactions between the enterprises, and their customers and visitors, continue to help quicken the pace of new enterprise start-ups. Several of the businesses also are acting as business incubators through training workshops and direct business experience. They are spawning further micro enterprises in Peckham and beyond. There are promising initiatives to bring local schools and further and higher education into close collaboration with the creative and cultural

sector. This will have wide ranging benefits for local education, skills training, and work experience. The sector is also influencing positively independent traders in the town centre mainstream economy and there is much potential for collaborative liaison between the sectors. The special nature of the old industrial buildings across all four sites in central Rye Lane area is a precious asset for Peckham in these clusters. It needs to be valued and protected for the way it matches the special requirements for nurturing the creative and cultural industries in central Peckham. A significance of all this is the cross sector nature of the potential of the new and growing creative and cultural sector in the local Peckham economy, and the sustainability it offers for the future. Replicated in other local areas in London, what appears to be a local phenomenon could turn out to be a significant part of the London-wide economy.

Policy 2.15Dc (Town Centres). Page 65

The changes to this policy state that boroughs should “proactively manage the changing roles of centres, especially those with surplus retail and office floorspace... **promoting diversification particularly through high density, residential led, mixed use redevelopment...**”. Peckham Vision welcomes the reference to promoting diversification, but considers that this cannot be achieved through promoting high density, residential-led, mixed use redevelopment. In fact, as illustrated by the outlines of our case study above, such development is likely to destroy the organic diversity of uses that has developed in Peckham town centre over the years. We therefore suggest that this policy text is amended to read “**promote diversification through the careful integration of valued existing economic, cultural and social uses and activities, with new mixed use redevelopment, where appropriate.**”

Policy 2.15Dc2 (Town Centres). Page 65

The change to this policy states that boroughs should “actively plan and manage the consolidation and redevelopment of other, mainly medium sized centres ... to secure a sustainable viable retail offer; a range of non-retail functions to address identified local needs; and significant higher density housing in a high quality environment.” Peckham Vision is concerned that this change would encourage more of the kind of inappropriate development proposed for the Network Rail site, and assumes wrongly that town centres of the medium size like Peckham are incapable of a viable retail offer without major redevelopment. In fact Peckham retail has adapted to the changed and changing demographic and is a lively diverse retail area with specialist retail drawing customers from further than the local area.

This is demonstrated by research by Dr Suzanne Hall LSE Cities in Rye Lane (London’s High Streets: the value of ethnically diverse micro-economies, March 2014). Dr Hall is collaborating with us in our work with the local traders to develop a collaborative and cross sector approach to town centre management issues. Moreover the growing creative and cultural industries are just at the beginning of developing their potential for retail on the high street, as well as already serving much more than a local market. Regularly they attract, to a variety of leisure and entertainment activities, customers from London-wide, and are also on the trail for visitors from further afield because of increasing national and international media publicity. Peckham is still and will remain a medium size town centre but with characteristics which mean it is adapting to London, national and international economic and social changes giving it significant potential for reinventing itself as a viable medium sized town centre.

This does not fit well with the drive for significant higher density housing. This cannot be provided in a high quality environment in a town centre like Peckham which is physically small and any housing development is in the middle of the growing night time economy and in the sites around the station mostly too close to the railway tracks for good quality residential amenity. **This change should therefore be deleted, or amended to ensure it is not used to impose those kinds of changes on medium sized town centres that are capable of adapting to the changed retail environment.**

Para 2.72D. Page 68

This paragraph reinforces the idea that medium town centres are likely to decline because of changing retail behaviour and so is subject to the same comments as above. It suggests that “there could be local exceptions ... where medium sized and small centres develop specialist attractions of more than local significance.” But ‘*specialist attractions*’ does not seem to describe the nature of the economic strands in Peckham which have more than local significance ie the specialist retail and the creative and cultural sectors. This paragraph needs amending to give a clearer indication than ‘*specialist attractions*’ of what makes for a local exception.

Chapter 4 London’s Economy

Policy 4.1a2 Developing London’s Economy. Page 127

This change states that “The Mayor will work with partners to: maximise the benefits from new infrastructure to secure sustainable growth and development.” From our experience in Peckham this puts too much emphasis on new infrastructure being necessary to secure sustainable growth and development. On the contrary providing new infrastructure can destroy the environment needed for the growth of a sustainable economy. The new growing creative and cultural economy in Peckham needs to be able to use the existing infrastructure which provides exactly the characteristics needed – low cost, adaptable buildings providing a stimulating creative environment. As we are experiencing, the new cultural economic sector across its wide spectrum of businesses, activities and skills is providing a significant new base for sustainable growth and development because of its potential for cross sector collaboration and with widespread social, economic and employment and skills benefits. Reflecting also the proposal made by Just Space to delete ‘growth’, this change should be amended to read: **“maximize the benefits from existing and new infrastructure to secure sustainable development.”**

Para 4.6. Page 128

We welcome the policy to encourage broad-based ‘growth’ (though maybe this would better read ‘development’). But the reference to ‘new’ sectors such as technology, media and telecommunications seems to miss the point that they are all well established industrial sectors as much as the others not mentioned. A major part of what is new about them is probably the impact of digital technology. This is also the case for part of the creative and cultural industries as we experience in Peckham, where digital graphics, and digital technology is widening the accessibility and scope of enterprises in the communication and entertainment industries. The combination of these and traditional parts of the industries at a local level is creating a ‘new’ sector in Peckham as much as those mentioned in this paragraph. To support and encourage this kind of growth/development at local level across London needs a greater acknowledgment of the inter-

connected nature of these industries at local level, as well as the need for low cost, adaptable old buildings to re-use as explained above.

Para 4.23. Page 136

This paragraph proposes that “release of surplus industrial land should, as far as possible, be focused around public transport nodes to enable higher density redevelopment, especially for housing”. Please refer to our description of the dynamics in Peckham around Peckham Rye Station stated in response to Policy 2.9. This description shows how damaging the Network Rail proposals for high density mixed use redevelopment around Peckham Rye station would be for the existing local economy in Peckham, one which is rapidly and organically growing into one of London’s most dynamic creative and cultural hubs. **We propose that this paragraph 4.3 be rephrased to ensure that where there is considered to be scope for releasing surplus industrial land around public transport nodes, a full assessment of the implications for the local economy should be undertaken.**

Policy 4.10. New and Emerging Sectors. Page 148

Peckham is self regenerating through a new and emerging sector which is not mentioned in this policy, ie the creative and cultural sector, which is contributing to the wider London economy in its reach. As mentioned above the new developments in the industries where digital technology is having a significant impact are also having a significant effect on parts of the cultural industries including music, film, animations, theatre and other performance activities and so on. This is replicated or could be in other parts of London where the physical and other local conditions are right. As Peckham is experiencing, this becomes more than a local economy as it attracts visitors from far and wide. One of the most important factors in encouraging this new industrial and economic sector in Peckham is the presence of affordable and adaptable old buildings, especially for start ups and small enterprise which are crucial to the emergence of new forms of existing industries. The importance of these factors needs to be acknowledged in this policy.

Eileen Conn

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10th April 2014

Attachments – copies of display panels from Peckham Vision’s mobile exhibition:

ANNEX A Central Rye Lane – An integrated Whole

ANNEX B Peckham’s Cultural ‘Hotspot’

CENTRAL RYE LANE

An Integrated Whole

Introduction

Over the last 10 years, the local community saw the potential for the four sites round historic Peckham Rye station. Within a few minutes walk of each other, they have in common old underused buildings suitable for a wide variety of creative and cultural enterprises. The proximity of the sites has enhanced this creative potential with the ease of new interactions and relationships between ideas and entrepreneurs. The area has created its own self regeneration and begun to realise the potential to widen the town centre in this central area to the east and west of narrow Rye Lane. This is a significant complement to the plans to open up the area in front of the station. The design of the new area in front of the station needs to be integrated with the design of public spaces which link the four sites in this central core of the town centre.



Illustrative masterplan map

The illustrative masterplan map below was produced by Peckham Vision in 2008 to show how the organic change envisaged for the Copeland site complemented the Council's first ideas for improvements around Peckham Rye Station. Peckham Vision has updated this map to include two further adjacent development sites: the cinema & multi storey car park, and the Peckham Liberal Club.

Peckham Liberal Club

In 2013 local residents successfully nominated this historic building as a community asset to avoid sale and demolition. It is a treasure trove of 1970's social club facilities, adding to local venues.



Multi Storey Car Park & Cinema

Sainsbury's superstore, many years ago, became a cinema now well loved by all ages. In the summers since 2008, the top of the adjoining Multi Storey Car Park became Bold Tendencies & Frank's Café. The Council plans to redevelop the site for housing and commerce. In 2013, responding to community comments at the Public Hearings, the Planning Inspector suggested that the redevelopment be deferred so the Council could examine the scope for converting the car park to a cultural centre. The Inspector's report on this is expected in summer 2014.



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Source for footnotes 1 - 11 from "Peckham Rye Station: the case for change" 2008 Roseveare Projects Ltd, with Southwark Council

Peckham Rye Station site

- | | |
|-------------------------------------|---|
| 1. Peckham Rye square | 7. Regenerated viaduct businesses and frontages |
| 2. Raised table pedestrian crossing | 8. Regenerated station building |
| 3. Peckham viaduct market | 9. Art Deco facade regenerated |
| 4. Access from market to square | 10. Vehicle entrance to market |
| 5. Two-storey retail development | 11. 2016-2020 development |
| 6. Tree planting | |

Peckham Rye Station site

The artist's impression in the map for the station site is from the Council's 2008 report. It was the only illustration for the station plan before Network Rail's plan for total redevelopment was published in January 2014. This plan was withdrawn a few weeks later after the Council agreed with widespread community concern. New plans will be developed involving local people through 'co-design'. The local aspiration has always been to open up the space in front of the station and to improve the rest, including the provision of public toilets. It has not been for total redevelopment.



Copeland Park & Bussey building

- | | |
|--|---|
| 13. Bussey Building | 19. Copeland Passage |
| 14. Bussey Court | 20. New build |
| 15. Upper floors linked to Bussey Building | 21. Entrance to CCQ from the east |
| 16. Bussey passage | 22. Wandle Housing blocks and roof garden |
| 17. Copeland Courtyard | 23. Bournemouth Corner development |
| 18. New build | 24. Restored arcade |

Copeland Park & Bussey building

This site was saved from the threat of demolition for a tram depot, through community action several years ago. The alternative proposal was rehabilitation of historic buildings integrated with new build creating linked squares and courtyards. This organic development is taking shape. The site's potential as a culture and leisure destination is being realised.



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CENTRAL RYE LANE

Peckham's Cultural 'Hotspot'

The growing cluster of creative and cultural enterprises, in four quarters around Peckham Rye station, is a very dynamic part of the local economy, with far reaching growth potential and now seen as a creative 'hotspot'. The area is full of solid old buildings reused for new and creative purposes. The spirit, low cost and adaptability of these buildings has stimulated the self regenerating process. Part of this is the close proximity of the enterprises, enabling personal interactions in a creative environment.

Creative enterprises took root over 20 years ago in Blenheim Court, and in the Bussey building. Others have arrived over the last 10 years. Peckham is now a significant arts, performance and social venue. The cultural sector provides an incubator for micro businesses, and has created significant potential for collaboration with the mainstream economy. The old buildings are a precious asset for Peckham because they match the requirements of the creative and cultural industries.



A1. Peckham Liberal Club, rescued by community action from demolition, is a historic social and entertainment venue.



B1. Much loved PeckhamPlex independent cinema, catering to a variety of local needs.



B2. Bold Tendencies' Summer Sculpture Park on top of the multi storey car park, half a million visitors since 2008.



B3. Frank's Café on the top floor of the multi storey car park – breathtaking views of central London.



C1. Long established Arches Studios in Blenheim Court with 19 artisans' workshops teaching making skills.



C2. Sassoon Gallery and Peckham Springs – the popular hang-out, showcasing new artists' work.



Peckham's creative 'Hotspot' map.
Cultural enterprises:
A = Peckham Liberal Club
B = Multi Storey Car Park
C = Peckham Rye Station
D = Copeland Park/Bussey building



C3. Bar Story now frequently appears in the media as a significant part of the 'hotspot' reputation.



C4. Brick Brewery: with refreshment facilities in an arch has an enthusiastic following.



C5. Art deco building 12-16 Blenheim Grove, including Muana London a Sierra Leone community restaurant hub.



C6. The Sunday Painter, an art gallery space showcasing emerging and mid-career artists.



C7. Peckham Refreshment Rooms, a new restaurant critically acclaimed in the national press.



C8. Peckham Print Studio is a community membership screen printer, helped by TSP to set up in the arches behind the building.



C9. Barry's Deli on Station Way, in an arch restored to its 1930's fittings and returned to a café delicatessen.



C10. The Old Waiting Room rescued by the community. The plan is to seek a community lease for business venue hire.



C11. Hannah Barry Gallery now at 4 Holly Grove is a major contributor to Peckham's creative 'hotspot' reputation.



D1. Bussey building now thriving with the CLF Art Café and other multiple uses e.g. music, theatre, performance venues & art studios.



D2. Copeland Park, home to the Bussey building and other buildings with a variety of creative and cultural uses.



D3. 'Safehouses' a venue for filming, photography and events set up and run by www.maverickprojects.co.uk