

Peckham Vision

For an integrated town centre

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Peckham, London SE15 4LE

31 December 2009

Rachael Gleave
Development Control Officer, Southwark Planning
Environment and Housing
160 Tooley Street, London SE1

Dear Ms Gleave

RE: Planning Application: 09-AP-2487: 143-149 Rye Lane & 1-15 Bournemouth Road, London, SE15 4ST

We welcome proposals to revive the constructive use of this land and property for a mixed development. However, this is a very prominent place in the town centre, so any development is therefore highly significant. It must be of a high quality and fit with its surroundings in a changing town centre. We do not think that this proposal rises sufficiently to the challenge and therefore record our objection and ask that in its current form it should be refused. The reasons are as follows.

1. The application's Planning Statement October 2009 itself quotes, in para 3.17, from the Council's UDP criteria for new developments in Peckham:

- The creation of high quality homes, with a mix of tenure.
- The improvement and enhancement of Rye Lane and Peckham High Street.
- The promotion of excellence in design.
- The creation of an urban environment of the highest standards.

It is admirable that the developers aspire to meet these important criteria. Unfortunately we think that they fall short.

2. *'The creation of high quality homes, with a mix of tenure'*.

- These are not high quality homes. They are not as good a quality for example as the Walter Menteth development on Consort Road. The flats are too cramped, and the density is too high for what is in reality a small site even though prominent and significant for the townscape.
- The mix of tenure is also inappropriate for this site as it exceeds the proportion of social housing that the UDP sets out for Peckham. The Council policy sets the proportion for Peckham as the reverse of that set out for the rest of the borough precisely because Peckham already has a higher proportion of social housing than elsewhere in the borough. What the policy has recognised is that Peckham needs a better mix of tenure and the balance in this proposal is taking it the wrong way.
- Low quality housing at too high a density is particularly inappropriate given its proximity to the adjacent Wandle blocks which in the two years since they were built and occupied have resulted in continuing anti social behaviour problems. What is needed in this location is a development which gives a much more balanced social mix.

- Although we support strongly the provision of more housing oriented towards families with children we question whether this can be provided adequately in this location in the middle of the town centre and next to an industrial site. The incidence of anti social behaviour in the neighbouring block indicates the social pressures that this kind of development can bring in such a location.

3. *'The improvement and enhancement of Rye Lane and Peckham High Street'.*

- The destruction of the historic features of these important buildings does not improve and enhance Rye Lane. Their replacement by poor quality design, given the setting, results in a serious deterioration of the townscape. The adjacent Wandle development which was completed two years ago shows strikingly the way the townscape deteriorates with such inappropriate and poor quality design. The retention of the façade on Rye Lane is incongruous in front of the much higher building behind it. It can result only in deterioration and not an improvement and enhancement of Rye Lane.
- We question also whether the height of the building especially on Bournemouth Road is too over-bearing and massed for this location compared with the heights of the buildings opposite on both Rye Lane and Bournemouth Road and the narrowness of Rye Lane. Taller buildings should be set further back away from the narrow main street to avoid being over-bearing.

4. *'The promotion of excellence in design.'*

- This is not achieved by the poor quality of design of the accommodation, as mentioned above, and also the poor quality of external design where the resulting buildings do not fit well with the surrounding townscape.
- The application's Planning Statement quote omits the remaining part of this criterion which is *'and having regard to the historic features and Conservation Areas of the area.'* This proposed development sadly ruins the important historic features on this site which have recently been highly praised by English Heritage. An imaginative design could easily incorporate these features and set them well in the central townscape. There are now numerous examples in the borough, in London and nationally of such high standards. Peckham deserves to have such quality as indeed the Council recognised in its UDP policy as quoted in the Planning Statement.
- This is such a major scheme for the future of Peckham town centre that it needs to be referred to the Southwark Design Review Panel to enable it to be redesigned to fulfill its aspirations to meet the Council's UDP criteria.

4. *'The creation of an urban environment of the highest standards'.*

- For all the reasons above it is clear that this proposed development falls short of creating an urban environment of the highest standards.

5. There have been significant material changes in the planning for this area since planning permission was granted for a development on some of that land in 2007.

- The land immediately behind and adjacent to this site, occupied by the Copeland Industrial Park and by Council offices, is no longer required by TfL for a tram depot. This land is also, along with the applicant's site, part of the larger Proposal Site 71P in the UDP which was designated to be used for a tram depot and associated uses. TfL's own review of tram depot locations in 2008 concluded that this was the wrong site for a tram depot for technical,

operational, and cost reasons as well as it being detrimental to town centre functions and uses. This is why the PNAAP Issues and Options report sets out imaginative mixed use options for the whole of site 71P, which no longer include any provision for a tram depot or tram associated facilities.

- We consider that this new planning context is a material change, and requires a new consideration of the way any proposals for the development of this part of the site, which is the subject of the planning application, fit with the developments on the rest of the site.
- In spite of the blight caused by the TfL plan to locate the tram depot here, organic developments have continued in the Copeland Industrial Park resulting in the growth of important cultural and small business enterprises. These have demonstrated the significant potential for this part of Peckham Town centre in the life of the town centre as a whole. In response to the Issues and Options report, Peckham Vision asked that the Preferred Option Plan should include an overall framework plan for the part of site 71P which lies between Copeland Road, Bournemouth Road and Rye Lane, including the applicant's site which is an integral part of it. We submitted an indication of the outline of such a framework, a copy of which is attached to this letter. This indicates that considerable progress has already been made in developing such an approach.
- We believe that this needs to be completed as soon as possible to provide the right planning context for a redesigned development on the applicant's site. We know that two major objectors to the current application – The Peckham Society and Peckham Business Park - both of whom are members of the Peckham Vision Consortium, are very ready to cooperate in the development of such an overall plan with the owners of this applicant site, and in liaison with the Council as appropriate both in terms of meeting the objections to the current application and also contributing to the development of an overall framework plan for site 71P in the PNAAP Preferred Options report.

We therefore ask that the Council encourage the applicant to withdraw the current application and to work with the other property owners and occupiers on the adjacent sites, and in liaison with the Council and its work on the PNAAP, to enable a redesigned proposal which meets the Council's UDP criteria for developments in Peckham and enables this site to fit within the overall plans which are emerging for this important part of the town centre and Rye Lane.

Failing that we ask the Council to defer consideration of, or refuse permission for, the current application to enable this discussion and collaboration to take place.

Yours sincerely

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Peckham Vision co-ordinator

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Copeland Cultural Quarter

Mixed organic development: rehabilitation of historic buildings integrated with new build creating linked squares and courtyards, and transition between town centre and housing to the east.

