London Plan EiP January 2019 Eileen Conn, Peckham Vision. Respondent Number 2515

Strategic and Local Regeneration M15.

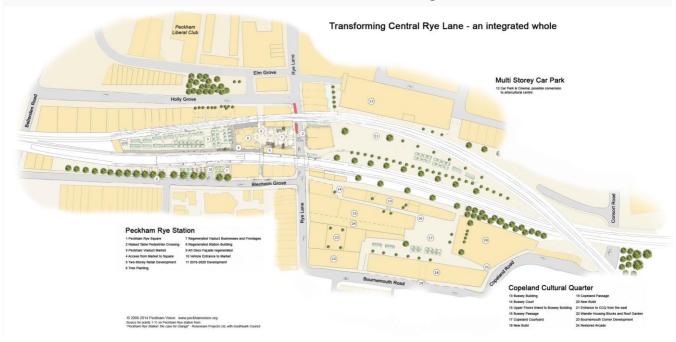
Would the Plan be effective in ensuring that development contributes positively to regeneration where it is needed and the building of strong and inclusive communities in accordance with Policy GG1? In particular:

- a) Would Figure 2.19 provide an effective and justified strategic framework for the identification of regeneration areas in local plans and neighbourhood plans?
- b) Would Policy SD10 provide an effective and justified strategic framework for the preparation of (i) policies in local plans and neighbourhood plans and (ii) regeneration strategies and programmes?

Central Rye Lane background

My response to these questions comes directly from our experience of the redevelopment of the area around Peckham Rye station in Peckham, SE London. This is a local case, which illustrates important strategic matters.

The account on our website of the main issues, which have arisen in these redevelopments of three major sites clustered in central Rye Lane around the rail station, has been placed in the EiP Library. The Peckham Vision weblink is here: http://www.peckhamvision.org/wiki/Transforming Central Rye Lane, which is shown in EiP document NLP/AD/23. The area is shown in this image here:



The three sites are:

Copeland Park & Bussey building: A 5-6 acre site to the South East of the station and within a 2 minute walk. On the map only half of the site is shown. The whole of the site was designated in 2007 for redevelopment in the Unitary Development Plan against local objections. The plan was to demolish all existing buildings and roads and use the land to build a depot for cross river trams between Peckham and Camden. Peckham Vision grew out of the local campaign started in 2005 which asked for the potential of the site without redevelopment to be properly considered. The Council rejected the arguments that the site had significant potential for regenerating the area without redevelopment. But the tram depot plan was cancelled in 2009 by TfL in the face of the 4 year local campaign demonstrating part of the site's potential to become a significant core of the new leisure and cultural destination in the town centre. That part of the site is now at the heart of a significant self generating local economy creating many jobs and small businesses, and attracting many visitors.

Peckham Rye station: The station is on the other side of Rye Lane the main shopping street going north-south. Local community campaigns from 2006 succeeded in getting the 1865 station building Grade2 listed, and

agreement by the Council and all local political parties to seek the resources to remove the 1930's buildings from the front of the station to create a new square. When that funding was secured in 2012, the Council stopped meaningful discussion with Peckham Vision which had been leading the community work on the station site's future. Two years later the Council unveiled with Network Rail a plan to build new housing around the station in blocks of 5 to 7 stories breaking through the limitations in the Conservation Area of the norm of 2-4 stories. Around 60 small businesses would have been cleared out for this redevelopment plan. The local opposition was so strong that the plan was dropped and the process started again at a much smaller scale. The businesses were saved and the site resumed its organic self regeneration and is now part of the expanding leisure and culture new economy.

Peckham Multi Storey (PMS): This large building was built in the 1980s as a multi storey car park with 10 levels attached to a new Sainsbury's store. When Sainsbury's moved in the 1990s the car park was never again used fully and many times was empty on the upper levels. An independent cinema moved in to the store part at the front followed a few years later by Peckhamplex which has become highly successful and attracts customers from all over London as well as locally being a family cinema with low price tickets and an imaginative film offering. In 2008 an art gallery that had moved in to the Copeland Park site during our campaign to rescue it from demolition opened Bold Tendencies a sculpture park on the top of the multi storey car park, with Frank's Café – just a few minutes walk from Copeland Park and Peckham Rye station. These became highly successful visitor attraction, as the view from the roof to central London is stunning. The site was then designated for redevelopment in the draft Peckham Area Action Plan (PNAAP) in 2012. Representations heard at the EiP in 2013 that the site had significant potential for reuse rather than redevelopment, led to the Inspector removing it from the PNAAP for the Council to examine long term potential. In 2016 the Council let the empty levels for a meanwhile use now named Peckham Levels. But the review recommended by the Planning Inspector was not done and the site reappeared in the New Southwark Plan (NSP) in 2017 as designated for redevelopment. The campaign to seek the review the Inspector had recommended continued until 2017. As a result of over 5000 letters opposing the NSP demolition plan and a successful nomination by Peckham Vision as an Asset of Community Value, the Council removed the site from the New Southwark Plan for the following 20 years to 2038.

Regeneration plans finally withdrawn

In each of these three cases over a period of 12 years 2005 – 2017, the original Council plan for demolition and redevelopment as part of their regeneration plans for Peckham would have wiped out what has become a hugely successful local economy recently voted by Time Out the coolest neighbourhood in the UK and 11th in the world. That Peckham town centre has become capable of attracting this kind of attention is the result in each case of the local vision for the site after long campaigns in each case being reluctantly agreed by the Council instead of their 'regeneration' plans. We produced a 'hotspot' map illustrating how by 2014 the links between the small businesses and activities on the ground were developing a micro economy in its richness capable probably of being properly understood only from inside and not by policy makers and redevelopers, (see map at end). This demonstrates the significance of local knowledge and experience, correctly identified by the London Plan as important. But it will not be effective without being embedded in required policy.

Would the Plan be effective in ensuring that development contributes positively to regeneration where it is needed and the building of strong and inclusive communities in accordance with Policy GG1?

This case example demonstrates that in the absence of a procedural requirement for an agreed baseline fact audit of existing structures and uses and an assessment of their potential, decisions for redevelopment and regeneration can seriously get in the way of self regeneration approaches. These alternative approaches and plans are understood in detail including their potential by local people and not by the Council. It is therefore essential to have procedures to enable those understandings – local knowledge and experience – to influence ideas about developments from the beginning. We are now experiencing the same mismatch between the understanding of local people on the value of existing buildings and their uses and potential in the Old Kent Road Opportunity Area (OKRAAP) just a mile or so away from Peckham town centre. Ideas from local knowledge and experience are currently being disregarded in favour of massive redevelopment. Again the absence of any requirement to establish clearly the facts on the ground in collaboration with existing stakeholders and have that agreed through consultation as the baseline, has led to the same lack of effective engagement of local people in the development of the plans. On this basis the OKRAAP will destroy existing neighbourhoods' potential and the communities that currently exist.

In particular:

a) Would Figure 2.19 provide an effective and justified strategic framework for the identification of regeneration areas in local plans and neighbourhood plans?

No, the map does not show individual sites at least on the copy I have seen. Moreover these sites are shown on the plan before any fact baselines have been compiled with existing stakeholders and so open to all the kinds of mistakes that were made in the sites that we know intimately in Central Rye Lane, and now being repeated in the OKRAAP and other large development sites in our borough and elsewhere. All this shows that the top down approach to selecting sites without engaging the local people effectively at the earliest stage leads to the wrong identifications of regeneration sites and areas.

b) Would Policy SD10 provide an effective and justified strategic framework for the preparation? of (i) policies in local plans and neighbourhood plans and (ii) regeneration strategies and programmes?

Policies SD10 A and C have the right sentiments in:

- A (1) 'thorough understanding of the demographics of communities and their needs'
- C 'develop locally sensitive policies and initiatives '

But without a requirement as a policy, that there should be a fact based audit compiled in collaboration with local stakeholders and tested in public consultation before any redevelopment ideas are taken forward, followed by a social impact assessment to bring out the full implications in full collaboration with the local community and its networking organised groups, SD10 policy is not yet effective as a strategic framework.

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



- C1. The Arches Studios
- C2. Sassoon Gallery and Peckham Springs
- C3. Bar Story
- C4. Brick Brewery
- C5. Muana Restaurant
- C6. The Sunday Painter
- C7. Peckham Refreshment Rooms C8. Peckham Print Studios
- C9. Barry's Deli
- C10. The Old Waiting Room
- C11. Hannah Barry Gallery
- D1. Bussey Building: CLF Art Cafe and other multiple uses eg. music venues, performance spaces, art studios, fitness studios, faith groups and venue hire D2. Copeland Park iconic Bussey Building plus warehouses for galleries,
- film locations, art studios and a gym
 D3. Safehouse, Copeland Road location hire

ouse, Copeland Road - location hire © Peckham Vision 2014