

Speaking notes for Eileen Conn MA (Oxon) FRSA MBE

Co-ordinator, Peckham Vision

info@peckhamvision.org

<http://www.peckhamvision.org>

<http://www.facebook.com/PeckhamVision>

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London Plan Examination in Public https://www.london.gov.uk/sites/default/files/FALP_Final_Matters_FINAL.pdf Session 6 - 9th September: Employment

Speaking

- As local resident, active part in planning policy developments LBS, PAAP
- As coordinator of Peckham Vision, network of people live, work and run local businesses.
- From local experience of social, commercial & economic developments in Peckham town centre.
- As Associate Fellow of the TSRC in my study of community organisations below the radar.

6... support sustainable economic growth... should plan to meet the development needs of business.

6a. ... jobs growth... does FALP create right conditions to facilitate this jobs growth?

Below the radar & research

- No, not for the small and micro businesses and enterprises, *below the radar*. ie below the radar of the corporate world, including government and public agencies. Similar to community activity being *below the radar*, explained in my paper in the EiP Library – Community engagement in the Social eco-system dance.
- Local economies below the radar are a significant aggregate across London for the total London economy.
- They are important in answering this Q because they get missed out of official statistics & understanding the dynamics of these parts of the London economy.
 - research in Peckham town centre has shown that the ‘dynamics and nuances are omitted or invisible’ and ‘invisible to the lens of power’ - *Suzi Hall LSE Super Diverse street: trans ethnography across migrant localities*.
 - She quotes the comparison of Peckham TC 2100 businesses, 13,400 jobs with Westfield Stratford 300 retail units and 8500 jobs. *Gort Scott High Street London report*
 - All backed up by our Peckham experience.

Peckham

- Peckham Rye station - community proposal to clean up and redesign the area around the station with small demolition, opening up the rail arches to town

centre commerce, and good maintenance and public realm design for the rest. This turned into a monster redevelopment for the Network Rail site of £25m, total demolition of all Network Rail buildings, and eviction of over 60 small businesses many of them the young shoots of a significant self regenerating cultural economy. This is described in some detail in my submission.

- Peckham shows that this kind of redevelopment encouraged by the FALP can destroy a local economy already self regenerating and creating good mix and quality jobs.

Which is going to create more jobs?

- Our experience is that in a town centre like Peckham it is the economy below the radar rather than the high density housing led model because:
 - Rooted in local economy and local social conditions – more sustainable.
 - Consistent with new economic and commercial trends especially digital technology & internet retail, which FALP wants to encourage.
 - No huge social and business disturbance as there is with demolition, clear out and redevelopment.

How do FALP not create the right conditions?

- FALP do not have anything that I can find that insists, as part of any redevelopment plan, on a thorough examination of the existing local economy, its dynamics, adaptability to the emerging economic and commercial trends, or an estimate of its economic, commercial and jobs growth potential.
- On the contrary, the direction and implications of the FALP seems to be an assumption that redevelopments with major demolition and new build are necessary to achieve regeneration, and new growth. In our current Peckham experience it is highly dubious and no evidence has been produced to show that £25m is necessary to stimulate the regeneration for the growth in jobs. In fact it will destroy the self regenerating economy. The net effect could be no increase in jobs and the loss of the growth in much more sustainable jobs.
- characteristic of this business and economic dynamic is the way the entrepreneurial nature of small businesses is adaptable and flexible; they have in several different trades and activities acted as social and economic incubators for acquiring skills to do new jobs and to create more small businesses & more jobs. This adds further momentum to the self regenerating capacity.
- Reading the stories from other communities across London, this does not seem to be an isolated case.
- Aggregating this across London indicates that for this significant part of London's economy the FALP as drafted have the potential to damage London's capacity for growth as well as its capacity for creating sustainable local economies.

6b Do the changes proposed demonstrate, as required by the NPPF, a clear understanding of business needs within the economic markets operating in and across London?

- No, the business needs of small businesses and entrepreneurial drive in a medium size inner town centre like Peckham are not understood.

Peckham

- In Peckham, a key aspect is the presence around the station of old buildings from Victorian era to the 1980s. Many are part of three large sites designated as development sites, which has turned out to mean demolition and new build throughout the whole site.
 - in 2008 the large site – Copeland Industrial Park – was saved in spite of the Council and TfL’s plans for transport infrastructure. It is now at the heart of the new activities and uses creating a new cultural economy in Peckham with significant economic and social potential. Key aspects of its success are the old buildings which are adaptable, flexible and affordable, which were to be demolished as derelict.
 - on the Peckham Rye station site we are currently finding it very difficult to get through to the authorities – GLA, Council and Network Rail – that the existing old buildings, which they want to demolish and replace with high density housing, and a total clear out of the rail arches - are a key part of self regeneration and are contributing to the successful emergence of the new cultural sector.
 - The third site is a multi storey car park which is the location of a café and sculpture park which have brought more than ½ million visitors to the town centre since 2008. The AAP EiP inspector recently recommended that the plans to develop that site by demolition and new build should be halted for further research, but the Council is very obviously unpersuaded of the merits of this.

Local economies nature

- All three are examples of the lack of clear understanding of the business needs of the local economy that is capable of self regeneration but needs affordable, flexible and adaptable old buildings, and not new higher cost buildings without the local business connections grown organically.
- nature of these local economies below the radar of the public authorities is one of personal interdependence and interconnections between small and micro enterprises in the locations they have grown in. These connections grow from physical proximity and can not survive disruption from redevelopment. So the offers of relocation after re-development, demolition, clear out and new build are lacking in understanding of these business needs.

6e para 4.23 encourages release of surplus industrial land around public transport nodes to enable high density housing. Is there a danger that this policy may deter investment and hinder the delivery of new employment?

Yes.

Is it surplus?

- Redevelopment plans make land surplus – happening in Peckham by threat of redevelopment and arches not being relet.
- The ‘new’ employment in our case is that created by the self regenerating economy which would be lost.

Peckham

- The plans for the Peckham Rye station site which is a public transport node, include 5,6,7 storey housing blocks.
- In this location it is inappropriate for several reasons:
 - The housing would be badly located - jammed up against the rail lines as the site is relatively small.
 - It is at the heart of the growing night time economy which would conflict with the residents’ amenity needs.
 - To achieve the density the blocks are out of scale with the surrounding buildings - where a tall building is usually 4 stories.

Housing v economy + jobs

- A major reason for this plan is the encouragement of high density housing around public transport nodes.
- This idea appears to outweigh completely that the economy there is self-regenerating spectacularly and is a key part of the wider self regeneration in that part of the town centre. We have produced a map of all these businesses and enterprises which shows their proximity in this site and the other 3 sites clustered around the station. This map is in our submission.
- High density led housing seems more important to the FALP than providing jobs and enabling a sustainable economy to emerge. So the FALP needs to give equal weight to housing and the economy & jobs so that the issue can be decided on the merits of the local economy.

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7b ...structural change in retail provision driven by changes in ways of shopping (internet, multi channel shopping) leading to expansion /strengthening of some centres and decline of others. Proposed FALP 2.15, 4.7, 4.8 sufficient to manage changes particularly where centres are declining so they remain viable and vital?

Medium size town centre

- Peckham is a medium size town centre. But it is not declining. Here the FALP get in the way as it is not clear what policies apply.
- As said on Tuesday it is self regenerating with a growing new cultural sector with an ever increasing number and variety of small businesses developing at a rapid rate, from artisans' productive uses to performance venues, and related support businesses.
- It also has a lively vibrant ethnic retail sector.
- Has growing micro enterprises run on internet in domestic settings, with need for occasional pop up sites in town centre. The town is developing ways to meet this need.
- The new enterprises are making good use of the new digital potential for their variety of operations and productions.
- It isn't in need of consolidation and redevelopment as in 2.15 D c2.
- It isn't appropriate for high density, housing led redevelopment.
- But the policies being applied to it are in fact just that - consolidation and redevelopment with high density residential led redevelopment.

Peckham Rye station site

- The Network Rail land around Peckham Rye station is the current example.
- As my written submission describes, this site is turning itself into a key part of the 4 sites around the station which are forming an area of interconnected enterprises.
- These sites currently provide many units of affordable adaptable and flexible workspaces which enable many small enterprises to be in close physical proximity. All these characteristics are critical to the success of the birth and organic growth of this new economic sector.

- But earlier this year plans were published by Network Rail, GLA and Southwark Council for high density residential blocks right up to the rail lines beside the station, accompanied by total demolition and clear out of the commercial area on the Network Rail site.
- This was encouraged by the policies of high residential development at public transport nodes and in medium size town centres.

Are FALP sufficient to manage the changes?

- No, they are getting in the way. They are threatening the existence of the new cultural sector in our town centre.
- It needs policies that
 - protect the vulnerable growing shoots of the new economy
 - while it consolidates and develops strong links with the other currently parallel economies in the town centre.
- What policies in the London Plan are appropriate for a medium town centre like this that is not declining, but needs protection from the (mis)application of these FALP policies?

Specialist Attractions of more than local significance

- Para 2.72D says “could be local exceptions where medium sized centres develop specialist attractions of more than local significance.”
- Can we have a clearer indication of what is meant here by ‘specialist attraction’ to see if it can apply to the kind of economy developing in Peckham?

Assessment of existing economy on a particular site

- Our suggestion was that a requirement for assessment of the existing economy on a development site would be a significant help in this. Can’t find a reference in the NPPF as suggested by the inspector on Tuesday to this.
- If Inspector’s view that not within his remit, would like therefore to ask GLA officers’ to agree to meet with us to discuss the point to work out how the London Plan can be interpreted to offer this protection.
- This is relevant not just to Peckham but to all London town centres which are threatened with similar inappropriate redevelopment plans. It is urgent to have a clear explanation of how to interpret the London Plan with the NPPF as the Inspector has suggested to enable this to happen.

7d NPPF says residential development can play important role in ensuring vitality of town centres. In promoting high density residential development in TCs, shld policy 2.15c recognise this should not be at expense of viability and vitality of TCs?

- Yes very definitely it should say this.
- For reasons given above, the high density residential development proposed for the key site around the station is a severe threat to the town centre’s viability and vitality.