

TRANSITION TOWN PECKHAM RESPONSE TO THE INSPECTOR'S PROPOSED MAIN MODIFICATIONS TO THE PECKHAM AND NUNHEAD AREA ACTION PLAN

Transition Town Peckham (TTP) exists to promote low carbon living and awareness of climate change in and around Peckham. TTP has been involved in consultations on the Peckham and Nunhead Area Action Plan for several years and was actively involved in the public hearings in July 2013.

The following points set out our response to the consultation on the main modifications to the Peckham & Nunhead Area Action Plan recommended by the Inspector following the Public Hearings.

General comments

While we are glad that the Inspector highlighted the need for the PNAAP to include a sustainable development policy (see Specific Point 1 below), we are disappointed that he has not taken up numerous specific sustainability issues raised in the course of the hearings, including:

- Inadequate provision of space for food growing;
- Inadequate provision for green corridors for biodiversity and sustainable transport;
- Failure to make clear provision for cycle routes;
- Failure to make provisions for increasing the energy efficiency of existing building stock;
- Failure to make provision for renewable energy generation.

In relation to the lack of defined cycle routes in the PNAAP, the Inspector has declined to propose any changes to policy 11 (active travel). However, further information has come to light since the hearings that gives further weight to the argument that the section is poorly prepared, and therefore fails the effective test of soundness.

The Mayor's vision for cycling in London - <http://www.tfl.gov.uk/roadusers/cycling/15459.aspx> - has been published since the Inspector's hearings, when the lack of clarity in the PNAAP about cycle routes was discussed. The Mayor's vision for cycling should be reflected in the PNAAP. Not least, the Mayor proposes a new "quiet route" through the PNAAP area that is not captured in the current draft. Cycling safety has also had significant media interest following recent deaths and protests. The PNAAP should explicitly commit the Council to plan for an proactively improve cycling safety. A new bullet should be added to the policy that states:

"We will improve safety to Southwark roads by ensuring all dangerous junctions are redesigned to Dutch standards."

In general, a major challenge for human settlements in coming years will be to ensure the sustainability of provision of basic needs such as good quality food, energy and transport in the face of the major changes to the climate that we are already experiencing. We fear that the PNAAP has missed an opportunity to put in place future-facing provisions for effective sustainability in Peckham and Nunhead.

Comments on Main Modifications

1. Presumption in favour of sustainable development

Main Modification30: insert new Policy 48 Presumption in favour of sustainable development.

While TTP welcomes the introduction of Policy 48 establishing the presumption in favour of sustainable development, we are concerned that the wording of the policy is unbalanced, in that it states that the Council will ‘always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible’. This emphasises the Council’s commitment to collaborate with those applying for planning permission, however, there is no equivalent commitment that the Council will always proactively involve the local community whose interests may be affected by the proposed development.

We suggest the following amendment to the wording of proposed Policy 48, in order to rectify this lack of balance: ‘We will always work proactively with applicants, local residents and other affected groups jointly to find solutions which secure development that improves the economic, social and environmental conditions in the area.’

2. Building heights

We are disappointed that the Inspector has not taken up any of the concerns raised at the hearings about the introduction of tall buildings, such as the impact on valued local views.

However, we consider that the Inspector’s proposed main modification, that ‘the taller element should be linked to an improved and generous public realm’ (Inspector’s Note to Southwark Council, October 2013, point 30) provides some basis for ensuring that the environmental and quality of life impacts of tall buildings are properly considered in decisions about this kind of development.

Similarly, we welcome the Inspector’s proposal that the PNAAP should provide greater clarity about the requirement for tall buildings proposed for the sites specified to: ‘...sustain and enhance the significance of Peckham’s heritage assets, their settings and the wider historic environment, including conservation areas and listed and locally listed buildings’.. This requirement at least provides grounds for considering the impact of any proposed tall building on the surrounding area.

Specifically, we support the following proposed modification:

MM19: amend Policy 26 on Building heights to require any tall buildings to sustain and enhance the significance of Peckham’s heritage assets, their settings and the wider historic environment, including conservation areas and listed and locally listed buildings. Further to establish that any taller elements on three proposed sites (PNAAP1, PNAAP4 and PNAAP5) should be linked to an improved and generous public realm.

3. Proposal site PNAAP 2: Cinema / Multi-storey car park

The Main Modifications proposed by the Inspector include the deletion of development site PNAAP 2, currently the multi-storey car park accessed from Cerise Road and the cinema which is housed in the same building (MM34).

TTP supports the deletion of the designation of this site for development for the following reasons:

- Redevelopment of the site would put at risk local assets:
 - The current cinema is well-located for local residents and is a well-used community asset
 - Inventive use of the car park for artistic, creative, performance and social activities (particularly the well-established Hannah Barry Gallery and Frank's Cafe) has made this building a focal point for local cultural life.
- The existing building is providing a flexible space for a range of artistic and creative enterprises, forming a dynamic hub of activity with the Bussey Building and the galleries, cafes and bars that have become established in the railway arches along Blenheim Grove (Dovedale Court and Blenheim Court) and Holly Grove.
- The building has become an iconic part of the local landscape and an attraction for visitors to Peckham.

Furthermore, as the Inspector has noted (Note to Southwark Council, October 2013, point 44) the contribution to housing, retail and business provision which could be achieved through the development of this site is relatively small: *'I find it pertinent that these figures account for a relatively small proportion of the overall housing, retail and business provision envisaged for the AAP area.'*

Specifically we support:

- a) MM34: Delete all of PNAAP 2 Cinema / Multi storey car park designation.
- b) The main modifications which follow from MM34 (e.g. MM8, MM9, M26, etc)
- c) Given the lack of suitable alternative sites for a cinema in Peckham, we propose that MM1 be edited to remove the reference to alternative sites: *'... we will seek to maintain a cinema either on its existing site or on an alternative site within Peckham core action area'*.

4. Provision for usage of business space for artistic and creative enterprises.

The Inspector has proposed a number of main modifications to ensure that the PNAAP takes a more consistent approach to acknowledging Peckham's role as a creative 'hotspot' and encouraging developments that build on this reputation. While this approach is reflected in some sections of the PNAAP, we agree that it needs to be reinforced in other sections.

In particular, we support the Inspector's view that the PNAAP could *'...do more to encourage the provision of accommodation suitable for [artistic/creative] enterprises'* (Note to Southwark Council, October 2013, point 10).

The development of artistic and creative enterprises is making an important contribution to the economy and reputation of the area. Where appropriate, the PNAAP should support their maintenance and development, for example through specific provision for the use of business space by artistic and creative enterprises, alongside small businesses and light industrial uses.

Specifically, we support the following proposed modifications:

- a) MM5, MM6 and MM7: amend Policy 6 on Business Space to include specific references to and provisions for artistic and creative enterprises.
- b) MM25, MM27: amend Policies 27 and 35 on Land use to include specific reference to and provision for use by artistic and creative enterprises.
- c) MM37: add the following statement to PNAAP4 (Copeland Industrial Park), 'The continued use of the Bussey building by creative and artistic enterprises will be supported and encouraged'.
- d) MM38: add the following statement to PNAAP6 (Peckham Rye Station), 'The railway arches within the site known as Blenheim Court should be retained and made available for class B1 business use. The continued use of these premises by creative and artistic enterprises will be supported and encouraged'.