

# PNAAP Examination

## Inspector's Post Hearings Note – Potential Main Modifications to be subject to consultation

### Extracts with a Focus on Creative Industries

\* **Policy 6 Business Space:** to encourage the provision of premises for artistic and creative enterprises in the town centre - including around Peckham Rye station and Blenheim Grove and the Copeland site: page 2#. (Pages 2-3\*).

\* **PNAAP site 2 cinema/multi-storey car park:** to delete this site from the AAP so the Council can assess its suitability for other uses such as an arts & cultural centre: pages 2-3#. (Pages 8-10\*).

\* **PNAAP site 4 Bussey building and Copeland Industrial Park:** to support and encourage creative and artistic enterprises: pages 3-4#. (Pages 10-11\*).

\* **PNAAP site 6 Peckham Rye Station:** to retain Blenheim Court – known as The Arches Studios and encourage their use by creative and artistic enterprises: pages 4-5#. (Pages 11-12\*).

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# page numbers in this document.

\* page numbers in the full Inspector's Post Hearings Note.

This document was produced by Peckham Vision in collaboration with the local community Peckham Planning Network, which formed during the work to prepare for the PNAAP Public Hearings. It was displayed during the Peckham Vision community pop-up exhibition 16<sup>th</sup>-18<sup>th</sup> December 2013, @Peckham Springs, Sassoon Gallery in Dovedale Court, off Blenheim Grove, SE15.

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**PNAAP EXAMINATION: INSPECTOR'S POST HEARINGS NOTE –  
POTENTIAL MAIN MODIFICATIONS TO BE SUBJECT TO CONSULTATION**

**Policy 6 – Business space**

8. Point 5 of Policy 6 supports a range of uses in the railway arches including small business space, light industrial uses and appropriate A or D class uses. Additionally, point 6 requires new business space to be designed flexibly to accommodate a range of unit sizes. However, neither measure highlights the desirability of artistic and creative enterprises.

9. By contrast, the supporting text to Policy 2 of the AAP acknowledges Peckham's reputation as a creative 'hotspot' and makes specific reference to the artists' studios in the area around 'Peckham Station', along Blenheim Grove and on the Copeland Industrial Park. It also expresses a wish to build on this reputation, to help create new jobs and contribute towards the vitality of the town centre through, amongst other things, opportunities for training and learning. I find the failure of Policy 6 to expressly address this objective to amount to an inconsistency which renders the AAP unsound.

10. Although the provisions of the Town and Country Planning (Use Classes) Order 1987 as amended (the UCO) effectively preclude the AAP from safeguarding existing premises specifically for artistic/creative ventures, it could nonetheless do more to encourage the provision of accommodation suitable for such enterprises. I find that soundness in this respect could be secured by including 'artistic and creative enterprises' in the list of uses in point 5 and adding ', including units suitable for occupation by artistic and creative enterprises' to the end of point 6, together with appropriate additions to the supporting text explaining the significance of this type of business. **Changes to that effect should therefore be subject to consultation as main modifications.**

**Proposal PNAAP2 – Cinema/Multi-storey car park**

40. The existing Council-owned building on this site is home to a sixscreen cinema, a sculpture gallery and an open-air café on the roof providing views over much of London. Although only on short-term leases and viewed by the Council as temporary interim uses, it is clear from the evidence before me that all three are very popular local attractions that have exceeded the potential as a focus for cultural and artistic enterprise that might reasonably have been attributed to them when first established.

41. The Proposal stipulates that 'the cinema should be retained on the site unless appropriate facilities can be provided elsewhere in the AAP area'. It is clear from the supporting text that 'retained' in this context is interpreted broadly so as to encompass the provision of a replacement cinema within any redevelopment. However, in the absence of cogent evidence to the contrary it appears likely that all three enterprises would permanently cease operations in the locality should redevelopment of this site take place. This would be inconsistent with the AAP's acknowledgement of Peckham's reputation as a creative 'hotspot' upon which it wishes to build, as expressed in the supporting text to Policy 2. Such inconsistency, unless properly justified, renders the AAP unsound.

42. Moreover, the Proposal as drafted does not expressly preclude refurbishment and conversion as an option and thus tacitly provides for it, yet contains no significant guidance relevant to such a scheme. Indeed, the Council has acknowledged that the indicative capacities set out in the proposal are unlikely to be realised if the existing building is retained. This omission introduces an element of uncertainty and confusion that, in itself, also renders the AAP unsound.

43. The Council cites the visual impact and limited scope for a high quality conversion of the existing building that would meet appropriate residential standards as a reason for endorsing potential redevelopment. It considers this to outweigh the merits of retaining the existing facilities in situ and to justify the inconsistency referred to above. However, I have seen nothing to substantiate this stance, such as an appraisal of the scope to retain and refurbish the structure with a view to mitigating adverse visual impacts whilst retaining important local amenities and realising the existing structure's full potential. In this regard I am mindful that some objectors to the AAP have expressed considerable vision as to the form that a successful conversion might take and, this being so, am not persuaded that this option has been adequately explored.

44. I have considered the fact that the site is intended to accommodate an indicative 160 dwellings and 1050 sqm of non-residential floorspace and recognise that this would contribute to the realisation of the AAP's wider objectives. In particular, I note that the residential allocation has fed into the AAP's housing trajectory. However, 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, that the said overall provision is not derived directly from specific allocations for Peckham and Nunhead in the CS or LP and that, in the context of the borough as a whole, the allocations attributed to PNAAP2 are less significant still.

45. I do not therefore find the housing, retail and business provision attributed to this site to justify redevelopment as opposed to conversion such that the proposal should be modified to provide only for the former or, indeed, to categorise PNAAP2 as an essential component of the AAP. This being so, I am not satisfied that the Proposal has been adequately justified by the evidence base. I conclude that the Council has considerably more work to do in order to finalise a properly substantiated proposal for this site. The pending borough-wide Local Plan provides an opportunity for this to be tackled. Accordingly, I consider that the Proposal should be deleted from the AAP in its entirety and reassessed at a later stage following further research.

46. The Council may wish to consider the implications of this for its housing trajectory. Associated revisions to other policies, supporting text and appendices will also be necessary and I look to the Council to prepare these. **Changes to that effect should therefore be subject to consultation as main modifications.**

#### **Proposal PNAAP4 – Copeland Industrial Park Class B use**

47. The 'required land uses' specified in the Proposal for this site include 'Business use (Class B)'. However, the indicative capacity section of the Proposal refers only to Class B1

and it was confirmed at the relevant Hearing that the Council's intention for the site was to preclude the establishment of uses within Classes B2 and B8 of the Schedule to the UCO as part of any redevelopment. Indeed, both these types of use have potential to generate high levels of noise and vehicular movement, which might have adverse implications for the living conditions of neighbouring residents and highway safety.

48. At the Hearing, both the Council and the representative of one of the site owners indicated satisfaction with a remedial 'minor change' to address this discrepancy. However, on reflection, I am mindful that other prospective developers reading Proposal PNAAP4 at the Publication/Submission consultation stage may have interpreted it as endorsing general industrial and storage/distribution uses and could thus have been dissuaded from objecting to the AAP. This renders the AAP unsound as it stands.

49. Unsoundness in this regard is simply remedied, by replacing the reference to Class B in the 'required land uses' section of the proposal with Class B1. **A change to that effect should therefore be subject to consultation as a main modification.**

### **Creative and artistic enterprises**

50. The reasons for designating this site, set out on page 173 of the AAP, make reference to the creative industries that have appeared on it and identify an opportunity to build on this and create a new cultural and creative quarter. Indeed, this cluster of creativity encapsulates and typifies the growing reputation of Peckham as an arts and cultural 'hotspot' emphasised elsewhere in the AAP. However, such support is not carried through sufficiently in the Proposal itself.

51. The stipulation to retain the Bussey building, which is the site's principal focus for creative and artistic enterprises, goes some way towards doing so. Moreover, as acknowledged above in relation to Policy 6, the provisions of the UCO effectively preclude the AAP from safeguarding existing premises specifically for artistic/creative ventures. Nonetheless, to ensure soundness by way of consistency with the support elsewhere in the AAP for this strand of the local economy, a phrase along the following lines should be added to the end of the first paragraph of the Proposal's site specific guidance: The continued use of the Bussey building by creative and artistic enterprises will be supported and encouraged. **A change to that effect should therefore be subject to consultation as a main modification.**

### **Proposal PNAAP6 – Peckham Rye Station**

52. The primary focus of this major upgrading Proposal is the redevelopment and refurbishment of buildings at the eastern end of the site, with an emphasis on conservation and improvement of the public realm. However, it also promotes consideration of the opportunity to develop a market further westward, to the rear of the station building. That part of the site is dominated by the brick arches which support the railway lines and station platforms. Many of the arches are occupied by small businesses.

53. Of particular interest is the group of such premises at the far western end of the site, known as Blenheim Court. This self-contained area, served by a single vehicular access and severed from the rest of the site, is home to a cluster of some 19 enterprises focussing on

the creative and artistic industries and comprising a mix of artists, cabinet makers, creative metalworkers and sculptors. Some of these are long-established on the site. Moreover, there is a marked degree of inter-dependency and co-operation which, on the evidence before me, has fostered the development of a thriving and coherent creative community.

54. As with the cinema/multi-storey car park site the subject of Proposal PNAAP2 and the Bussey building included in Proposal PNAAP4, this community encapsulates and typifies the growing reputation of Peckham as an arts and cultural 'hotspot'. The AAP acknowledges this reputation in Policy 2, the supporting text to which records that the Council wishes to build upon it. Indeed, both policy and text refer specifically to Peckham Rye Station. Clearly, therefore, there is considerable merit in providing for the existing businesses at Blenheim Court to remain and prosper with a view to fostering further this innovative strand of the local economy.

55. This being so, the absence of any reference in Proposal PNAAP6 or its supporting text to the existing creative grouping, let alone to safeguarding measures, is a marked inconsistency within the AAP which engenders unsoundness. I have seen no cogent evidence to substantiate the Council's stance that Blenheim Court should be made available for reuse or redevelopment. My attention has been drawn to discussions between the Council and Network Rail, which led to agreement that all of the latter's land should be included within the site in order to maximise flexibility in taking the station upgrade forward. However, nothing before me suggests that such flexibility, or the ability to fund and deliver the principal project, is dependent on the availability of Blenheim Court.

56. There is ample space between Blenheim Court and the station building to accommodate the envisaged market. Moreover, the narrow, tapering, triangular shape of Blenheim Court is a significant limitation on its potential for reuse in practical terms. Most importantly, the premises are basic railway arches which are not particularly well-appointed and are thus attainable by nascent and/or small-profit businesses dependent for survival on relatively low overheads. Whilst the Proposal provides for Class B1 business use as a required land use, it is likely that upgraded or replacement premises in this category would be beyond the reach of small creative and artistic businesses.

57. I have considered whether the AAP might be rendered sound in this regard by simply excluding Blenheim Court from the PNAAP6 site. However, I find that this would not go far enough, as it is not clear that safeguards on existing business floorspace found in AAP Policy 6, CS Strategic Policy 10 and saved SP Policy 1.4, the latter being subject to a number of exception criteria, would apply to the arches. I therefore conclude that text along the following lines should be included in the site specific guidance for PNAAP6: The railway arches within that part of the site known as Blenheim Court shall 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. **A change to this effect should therefore be subject to consultation as a main modification. A PDF of a suitably amended Figure 32 highlighting the area covered by Blenheim Court should be provided.**