

Comments on Peckham Rye station planning application 15/AP/4337

From Eileen Conn, local resident & town centre worker, coordinator of Peckham Vision.

I detail below my response to this planning application. I won't object to the changes of use proposed, but I do object to a substantial number of the details which need further consideration. I suggest that if planning permission is granted it is subject to further review of the details of design and management, indicated below, in a discussion process which itself is created informally, with local people who wish to volunteer who have experience with the process so far.

The details which need further collaborative discussion include the topics outlined below under these headings:

- New square landscape
- Station facilities
- Blenheim Grove corner building extension & design

In addition, I wish to register my concerns about the whole 'co-design' process and also the consultation held during this formal planning stage. The Cabinet recently agreed with the local deputation seeking a review of the 'co-design' process and I will leave my detailed comments about it to the review. But I need to register at this stage two particular concerns about the current formal planning consultation process:

1. The presentation of the documents accompanying this major planning application has been poor. There are 96 documents and there is no guidance as to where key info can be found in them. This is bad enough for usual planning applications but for a major case like this it makes the problems worse. Then further amended documents were posted late in the second consultation period and without notice. The failures of the consultation process at this stage compounds the problems there have been throughout since the promise from the Council and Network Rail of working "with local people as full partners in shaping the scheme" (25 February 2014). Not only has this not been fulfilled but there has been at this latest stage a very inadequate process for making the information about the planning application accessible to local people in a meaningful way. All this can be covered in the review that we hope will be conducted. However the late changes in proposals, and the very inadequate way in which the whole consultation process on the planning application has been handled, adds weight to the suggestion that if planning permission is granted it should be on condition that details should be subjected to further review. The poor presentation of the material for the planning application is some evidence that the recent DCLG sponsored pilot in Southwark, to improve the public accessibility of planning application information, has not succeeded.

2. Effect on local traders – Equality Impact Assessment (EIA). This was one of the documents posted in January 2016 for this re-consultation. This concluded that the development, while having positive outcomes, could '*give rise to negative equality impacts in terms of potential loss of existing employment and business opportunities, and, to some degree, to access to culturally-specific goods and services, and that BME-owned businesses and employees ... are particularly vulnerable to potential negative effects.*' These conclusions were based on surveys done in early 2014 and revisited in early 2015. This report appears to have been made in March 2015, but has only just been contributed to public documents for the planning application in mid January 2016.

The processes used to support the small businesses on site during this whole process proved to be inadequate. The strong package of promised support did not materialise. In the later stages, some support appeared in relation to the proposed relocation of some of the businesses to Bournemouth Close. Moreover, the 'co-design' processes throughout the whole period were not designed with their specific business operations in mind. Identifying the details of these issues, needs to be covered in the 'co-design' review.

But given that there had been an EIA report, and that it had been completed in early 2015, it is perplexing that it appears it was not made publically available in the co-design process, and that an updated version was not submitted amongst the planning application documents in the first stage of consultation in November 2015. Has this process properly fulfilled the requirements for equality assessment for this planning application?

NEW SQUARE LANDSCAPE

Greenery:

- **Trees:** I support the introduction of trees in the new public space as Rye Lane has very little greenery. But to be successful in this urban space they need to be trees which are suitable for this space in terms of maintenance. I have seen comments which indicate that at least one of those now proposed may not be the right selection. Moreover, the plan for trees has been submitted even after the re-consultation began, and many who have concerns about this may not have seen them. The choice and location of trees needs further public consideration before decisions are made.
- **Planters:** the experience of planters in the station forecourt has been that they are used as litter dumps. It is not clear how this is to be avoided in the plans for the new space. It is also not clear whether the late addition of trees to the plans has any effect on the number and location of the planters. This also seems to need further public consideration.
- I support the introduction of **vertical plants**, which also need careful maintenance.
- I would like to see the introduction of **edible plants** in this public space as part of a food growing plan throughout Peckham.
- I support the proposal for a **local growing group** to bring together local people – businesses, traders, residents and shoppers – as a focal point for caring for the greenery at the station. This should be a partnership with the station operator and the council and linked with ACORP the Association for Community Rail (and Station) Partnerships. I would like to be involved in helping to set this up.

Physical fabric:

- **Vertical columns for supporting Platform 3.** There are reservations and objections from some on the style of these necessary sturdy structures. While I support the plan to introduce growing plants on the platform supports, there are questions around the nature of the supports which may need further design consideration.
- **Shop canopies.** The hard metal canopies in the top fronts of the rail arches for the shops seem a constraint on the light and flexible use of the arches as new shops. Have any discussions been held with operators of such shops and potential operators to find out what they think from a practical operational perspective? If so can we see the results of those discussions? If not this is another design aspect that needs further consideration.
- **Seating.** The arrangement of the seating is linked to the positions of the planters which surely need further consideration now after the last minute introduction of trees?
- **Public realm and paving** – I am not convinced that the heavy patterns chosen for the paving are right for the space. This public realm is part of the Townscape Heritage Initiative (THI) project along with the Network Rail building opposite the new square, and so is receiving THI funding. But I can't find a reference to this in the planning documents. Is it there? It needs to explain clearly how the design and materials proposed fit with the restoration of this historic space in this central part of Rye Lane between the grade 2 listed station building and the art deco building at 117 to 125 Rye Lane. It needs to explain clearly what role the THI project is having in ensuring the design is acceptable from the THI historic restoration perspective.

- **Public realm design.** I can't find an overall plan for the public realm adjacent to the new square – in Holly Grove, Blenheim Grove and Rye Lane. If there isn't anything, this is a serious omission. How can there be sensible design and planning for the public realm if it is done piecemeal? There needs to be an agreed THI overall design plan before any decisions can be taken about the design of the public realm in this planning application.
- **Need for integrated plan.** The plans for the Network Rail buildings in Holly Grove, the access to the station platforms, the restoration plan for the historic station building (see for example the letter from the Victorian Society) and the plans for Dovedale Court behind the station, are all noticeable by their absence. All these elements were an integral part of the 'scheme' which was to be covered by the 'co-design' process. But since the 'co-design' process began they have been excluded from public view never mind a co-design process. This planning application for the new square and the Blenheim Grove corner is being presented in a vacuum, and needs to be considered as part of an overall plan for the station site.

STATION FACILITIES

- **Pick up & drop off places for taxis and other vehicles.** An arrow with 'taxis' pointing to Holly Grove appears on one of the diagrams but I can't find a text explaining it and if it also provides spaces for non taxi pick up and drop off. This is essential and one of the facilities mentioned in the 'co-design' process. Where is this going to be and how is Holly Grove going to be reconfigured for it? From preliminary enquiries of the planning department it seems that this is not being considered as relevant to this planning application. If this is so, I find it shocking that the design of this important space in front and alongside the station, which is such a heavily used public space, is being designed without an integrated approach.
- **Newspapers and posting letters:** station users need these. I assume that in the new commercial space there will be a news vendor. I hope so! However, there is no letter box anywhere near the routes to the station. It is a facility that has been requested for years. Has that been investigated with the postal authorities? A letter box on the station site needs planning for its infrastructure. Surely this should be considered now when the new configuration of this space is being decided? If not why not? It is needed for the adequate design of the spaces.
- **Public toilets:** I welcome the recognition of the need for and the provision for public toilets as part of this development. This is a good result of the community campaign for public toilets which was rejected under the Weston Williamson plans two years ago. It is part of the reconfiguration of services and facilities essential for modern stations. The references are however scattered through several documents and I can't find the place which explains their management and maintenance. This is clearly of exceptional importance, and needs to be addressed with the participation of the interested public, and satisfactory arrangements being devised made as a planning condition.
- **Other station toilets publicly accessible:** There will be other toilets being provided in the reconfigured buildings. There must be maximum public accessibility created for these to provide public supervised toilets in the vicinity of the station for the longest possible hours. I suggest that any planning permissions have a condition that satisfactory agreements are made about the accessibility of the public to any toilets in the area under consideration.
- **Bus stops:** I have not been able to find the plans for the bus stop locations in relation to the new square. As pedestrian crowding at these bus stops is a major reason for removing the arcade and creating more space for pedestrians, it is essential that these designs are brought into the picture at this time of designing the new square, and that the public are involved in this discussion. This should be included in conditions for planning permission.

BLENHIM GROVE CORNER BUILDING

Two Storey addition

- The disappearance of the 6 to 7 storey building proposed two years ago by the Council-Network Rail-GLA plan on this corner is welcome. That out of scale modern building would have signalled the end of the special nature of Peckham town centre.
- I took part in the 'co-design' process and there was not an opportunity to have a local collective discussion of the respective merits of restoring the two storey building or extending it as is now planned. It seemed to have been decided before the consultation that the building was to have two extra stories added. So none of the matters below were properly considered. The lack of opportunity to have this comparison was just another result of the very inadequate consultation.

OBJECTION

So I have to object to the addition of two stories on top of this corner building to register these points.

- The extra two floors will destroy the symmetry and the historical context of the two storey buildings around the station building. There have never been more than two stories around the station. This 4 storey building will crowd out the newly revealed station building.
- The refurbishment and restoration of the companion two storey building at 10-16 Blenheim Grove shows how the restoration of this corner building would have been an enhancement of the street scene and the setting for the station building.
- This building is one of 7 art deco 1930s buildings clustered together in this central part of Rye Lane. If this one was restored like its companion building, it could have been a significant visitors' attraction for the town centre. While the individual buildings may not be of top architectural merit, the cluster of buildings has significance from the combination of its historical significance and the street scene appeal.
- The extension will block the view of 133 Rye Lane from Platforms 1 and 2 at the station which is one of the significant views on entering Peckham.
- The 'cluster' could just about survive the loss of the Arcade building but not the distortion of this Blenheim Grove building and the as yet unknown plans for the art deco companion building on the corner of Rye Lane and Holly Grove. A great lost opportunity which we had no chance to discuss in the 'co-design' process.
- The planning application appears to argue that as there are some 4 storey buildings in Rye Lane it is fine to build more 4 storey buildings! On the contrary, to have more taller buildings in Rye Lane will change the nature and character of it as a varied street scene that is kept alive in human terms because of the visibility of the sky with a mixture of low rise building heights. Rye Lane is very narrow, and crowding out the sky with taller buildings would be over bearing. We should have had a chance to discuss this, especially in a 'co-design' process!

Design of extension

- If the extension is approved, I have reservations about its design which looks like a row of beach huts landed from somewhere else.
- Their totally different character from the existing building is said in the D&A statement to be based on the need to show they are from a different era than the art deco one, illustrating perhaps that the designer realises it is the destruction of the art deco cluster.
- The fact that the materials have been changed during the course of the consultation shows that there is not yet consensus about the most appropriate materials for good maintenance. So close to a railway and in the middle of a crowded town centre with a lot of traffic does not bode well for its maintenance and appearance after a while. There are also queries about the robustness of the material in high winds. The successful restoration of the 10-16 Blenheim Grove building shows there are no such problems with the building without the two storey extension.

ARCADE DEMOLITION

I have left my comments on this to the end as I am not objecting at this late stage to its demolition. However if there had been adequate 'co-design' process it is possible that we might have discovered that restructuring part of the Arcade rather than total demolition could have been an equally good way of achieving the extra pedestrian space, improved environment and better station user facilities. We will never know because there has never been an adequate discussion of the plan to demolish the arcade. I can speak on this since I was personally responsible for initiating in 2005 the first wider public discussion about revealing the front of the station building to Rye Lane. This was through the Rye Lane & Station Action Group (RLSAG), which I initiated and coordinated with the support of the Council's Peckham Programme in 2004.

In the early stage of the RLSAG we used a digitised copy of a post card of the station building in its early years (1860s) to raise awareness of the potential. That was taken up by the politicians in 2007 and became council policy by 2008. We had always worked on the assumption that if the funding was ever acquired there would then be a wide public exercise to clarify the ways to proceed. During discussion with council officers in 2011/12 there was a plan to have a public competition which would stimulate public discussion. Unfortunately in early 2012 that idea was abandoned and the Council, Network Rail and GLA refused to discuss anything further until their joint plan was put forward by Weston Williamson in November 2013/January 2014. This was to demolish every commercial building on the station site and replace it with totally inappropriate modern large buildings – out of scale and out of character. This was rejected by the community. We asked for a 'co-design' process to establish through collaborative discussion about the whole site, a local understanding of the options for the whole site and the relative support for them. This returned full circle to the idea for public discussion there had been up until 2012, but then dismissed for two years.

Unfortunately the 'co-design' process turned out to be just a more detailed form of consultation with its deficiencies, than a real form of collaborative working. The Cabinet recently agreed to a community deputation request for a review of the process so we may finally bring out what the lessons are and how to learn them. What not to do as well as what to do. However for the Arcade it is too late as decisions must be taken now. As a result of the failure of the 'co-design' process, the interesting and imaginative ideas that began to surface during 2014, once public discussion had finally been stimulated by the wrong plans, never had a chance to be explored. These included a variety of ways of transforming the current arcade structure to create on Rye Lane the much needed increase in pedestrian space and a more pleasant station frontage while retaining more commercial space and without destroying the Arcade altogether. Members of the local public who wished to put forward their ideas about this, and those like myself interested to hear what other ideas there were, never had the chance to discuss them in the 'co-design' process in a useful way. As a result, in spite of the lengthy process, we can't be reassured that the total destruction of the Arcade, and the reduction of small business space, was essential to achieve the improvements we all wanted. This is another illustration of the failure of this 'co-design' process.

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