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VITAL

OKR

A VOICE FOR THE ECONOMY
OF THE OLD KENT ROAD

Hello Planning Committee members.

(copied to Southwark planning team with request to be treated as a late objection).

On behalf of members of the Vital OKR business association I urge you to reject this scheme when it comes before you this evening.

The scheme should be rejected because it is in contempt of the development plan in which the site is designated as Strategic Protected Industrial Land. A plan preparation process is underway, but currently neither the draft OKR AAP nor the PSV of the New Southward Plan have sufficient weight as material considerations to justify disregard of the development plan. Members should note that both of the plans currently in preparation, that propose deletion of the SPIL designations, are heavily contested on the matter of industrial accommodation, and that further reduces their weight. It should also be noted that the masterplan content of the draft AAP, that your officers have been urging the applicant to follow, was prepared behind closed doors, in collaboration with consultants employed by Southwark and major landowners including Berkeley Homes, but excluding businesses and faith organisations in the area, and excluding residents of the area.

After long campaigning by groups, including Vital OKR, Southwark have at last promised to commence a series of workshops focused on this sub-area of the wider OKR opportunity area, so that the fuller range of stakeholders in the area can commence participation in detailed aspects of the plan making process and the discussion about development proposals. But several months after they were first promised those workshops have not commenced. We observe that the process of preparation of the masterplan content has been unlawful in relation to Gunning principles regarding the general principles of the public law duty to consult.

We ask you to reflect on the ethical implications of your decision tonight. If you approve this scheme, second-guessing the outcomes of the ongoing plan making process (by acting as though the draft AAP is adopted) then you will have disregarded the fundamental safeguards of fairness in the planning system, you will have side-stepped the democratic and participatory plan-making process that was established following the Skeffington review in the 1960s, you will have prematurely closed down options for the future plan, you will have allowed fundamental changes in a large part of London that will have huge effect on the lives and livelihoods of people who have to date had little opportunity to challenge the nature of the change, and hence you will have abused your power. The fact that your committee has previously waved through 10 other development plan violating schemes in the Old Kent Road area does not lessen the significance of further contempt for the intent of the planning system and the crucial plan-led principle that is strongly emphasised in the NPPF. Please, be aware that if you prematurely approve this development proposal then you are denying people their hard-won civil rights, you are participating in a process of bludgeoning into place plans that the public has not yet had the chance to challenge through an enquiry in public.

We also ask you to note that in our representations on both the draft OKR AAP and the proposed submission version of the NSP we have objected to removal of SPIL (SIL) designation from the part of the Male Street site west of the detailed component of the application (and area that we suggest should be retained for intensified industrial), and have suggested that the acceptable designation for the rest of the site would be LSIS, a designation that, when the new London Plan is adopted, will allow residential together with industrial on condition that compatibility, and no net loss of accommodation quantum is achieved. Our objections and designation suggestions are well evidenced in relation to policy and need, indeed much better evidenced that Southwark's own proposed designation geography. Our objections are live and we still await any dialogue about them. If no proposals to amend designations come forward in advance of the NSP enquiry in public then we expect to put our case to the inspector. We believe that the NSP is self evidently (and spectacularly) unsound on the matter of industrial accommodation (it allows a 70% reduction across the borough, in contempt of the Mayor of London's no net loss policy, and allows substantial

reductions in the OKR area regardless of London Plan policy and evidence of demand prepared for the GLA, and Southwark), so there is a strong possibility of requirements to amend following the enquiry. It would be wrong to preempt this process by prematurely recommending for approval.

Without prejudice to the above, we confirm our opinion that mixed development on the majority of this site, including a substantial quantum of residential and generous public spaces and path links, is a good general scenario, but the way it is done in the current version of this scheme is not acceptable.

We highlight in particular that the scheme includes an insufficient quantity of industrial accommodation, and the proposed accommodation is not fit for purpose. Even if this site was to have its SPIL designation removed, Policy 4.4 of the London Plan and Policy E7 of the draft London Plan require any mixed development to achieve no net loss of industrial capacity. Draft London Plan Policy SD1 re-iterates that there should be no net loss of industrial floorspace capacity in the Opportunity Area, and that areas that are released from SIL should seek to co-locate housing with industrial uses. Where there are few buildings on a site (as is the case at Malt Street following demolitions some years ago) the Mayor's policy requires re-provision of a notional industrial capacity on the site based on a 65% plot ratio. On this site, based on the current 2.1 ha SPIL extent, the industrial floorspace requirement (based on 65%) is 13,650 sq m. The proposal only includes 4,513 sq m, just 33% of the extent that policy requires.

We have roughly investigated the potential for expanding the industrial accommodation within the scheme, while accepting the overall development scenario and key practical constraints. I refer you to an email from August 2017 (attached below, text coloured red) for more details. We concluded that a better version of the scheme could achieve around 3,900 sq m of ground floor light industrial accommodation, and around 6,800 sq m of upper floor B1c workroom accommodation. The total of 10,700 sq m would only be 2,950 sq m short of the policy requirement.

We further observe that it would be realistic for the developer to add a second level to the basement, as industrial space, that could be ideally suited to mini-bus and van depot use (as has been included within the recently approved Ruby Triangle scheme) in order to meet (and potentially exceed) the minimum policy requirement.

If a good mixed development, designed to allow co-location of suitable industrial uses and residential, can't be achieved here, on this large site, by one of London's best resourced developers, with Southwark Council and the GLA willing to assist, and abundant demand for the industrial accommodation from business able to pay good rents, then where can it be achieved? It should be achieved here, indeed must be achieved here if the OKR vision is not to fail. Your committee should insist on it.

Regarding the suggestion of basement depot accommodation please note that social enterprise Lascot, the current occupiers of Surrey Wharf are a community mini-bus operator serving Lambeth and Southwark, and they will need new accommodation in the area. Another mini-bus operator that works with Lascot is currently without dedicated premises and so parks a fleet of mini-buses along Ossory Road. Local van hire company Ace Rent a Van are currently renting space on the ex-Toys r Us car park, but will need replacement space. London Transit Van Centre have been operating in the area since the 1970s, but are expecting to be evicted soon from their Old Kent Road premises. Likewise local ice-cream van operator London Catering Services were recently displaced to Erith, but are very keen to return to the area since the bulk of their business is in central London. Such businesses could be accommodated in a second basement layer.

Please note that our suggestions for incorporation of a policy compliant quantum of industrial accommodation could be achieved without compromise of the pedestrian and cycling only central parts of the public space (linear park), with goods vehicle servicing achievable from Bianca Road, Latona Road and Frensham Street.

While the light industrial accommodation proposed in buildings B10 and B11 could be welcome, and aspects such as the dedicated partially covered yard are excellent, we ask you to note that the ceiling heights are inadequate and the goods lifts are too small to be fit for purpose (the drawings only indicate small passenger lifts), and the routes from places of loading to the goods lifts are unsuitable for the use intended. There needs to be significant redesign of these buildings, including the first phase (detailed component) B10 building, in order to be suitable for the use suggested.

We have repeatedly been told that Southwark now have expert advice available on the design of industrial accommodation, yet the evidence suggests otherwise. If someone with expertise had spent 10 minutes looking at the drawings of this scheme they could have highlighted the inadequacies. If I had been asked I could have pointed out the way in which the proposed accommodation is not fit for purpose. This failure by Southwark is not good enough. The matter is still not being taken seriously, and deficiencies in officer knowledge are not being addressed, nor are businesses in the area been asked for advice on practicalities, on requirements and needs.

The proposals also flout requirements to consider business re-accommodation and relocation requirements. It is not sufficient to note that Southwark Council (depot), Travis Perkins and Lascot have only weak tenure and that they are aware of the proposed development. The tenure circumstances of businesses, and their knowledge of development plans that will affect them, are both irrelevant to consideration of their needs. It is clear that all 3 current occupiers require accommodation in the area, and that if they fail to get it their businesses will be compromised, yet no proposals have been put forward to incorporate those businesses in the development nor to achieve satisfactory relocation.

We urge you to reject the scheme, because it is in contempt of the development plan, because it fails to provide sufficient and suitable industrial accommodation, and because it fails to address the relocation needs of industrial uses currently on-site. We suggest that you could state that should development plan policy for the site be changed (as seems likely) then a revised scheme, with improved and substantially expanded industrial accommodation, such as to be compliant with policy, would be welcomed.

Good wishes.



Kaymet and Vital OKR





Here are some initial thoughts on the Berkeley Malt Street application.

The whole idea of the application coming in now is grotesque. It violates current policy and also draft policy for the area, most notably by proposing no industrial / workshop accommodation (current policy says that's all there should be, draft policy says that it must be there in combination with other uses including housing). Since draft policy has not yet reached a deposit consultation stage, and only beyond that will there be an inquiry with a planning inspector, and following that comments, potential further changes, then adoption, Berkeley's application is an insult to the process. The way that's is meant to work is that only after all that vestige of a fair process should schemes that meet the policies be embraced.

Nevertheless, a pragmatic / realistic take demands taking the Berkeley scheme as it's proposed and seeking to push it somewhere better, via bold tweak suggestions rather than start again demands. I think the right main focus of tweak getting efforts is securing much more workspace, including industrial, in the development.

On Friday we started having a go at overlay re-works of the application scheme. Below is a sketch of ideas for how it could be adjusted. The sketch has suggested ground floor industrial / workshop space coloured red. It includes thoughts on how the vehicle depot site they work around could be developed in future, with another hybrid industrial / workroom / studio (or part residential) building.

And here's the Berkeley version:

5.11.2 Illustrative ground floor plan



What we explored was based on keeping all the main residential blocks the same up above lower floor / floors, except for pushing them up a meter or two to give height for industrial, keeping cores the same, tweaking the configuration of the ground floor needs of the residential (but the same extent), substantially reducing the paved and shrubbed-up spaces, then using a bit of access ingenuity, juggling the plans, junking the silly 'mews' housing on the Surrey Wharf site (the bit that meets Malt Street), suggesting a 3 storey workshop / studio / workroom building instead, growing a big chunk of nicely done shed in place of some of the vast square. Through all that you can get to 42,000 sq ft of ground floor industrial in 10 units (or could be divided to achieve 13 or more) all with decent goods access and should be able to achieve acceptable backs (noise etc) and general compatibility with residential. There is nil industrial in the application scheme. You can also get to about 73,000 sq ft of upper floor studio / workroom, while the application scheme has about 45,000 sq ft (rough add up, haven't checked back in their documents). Small scale cafe / retail or whatever spaces x 3, not radically different from the Berkeley application, we just juggled them a bit.

They show lots of awkwardly shaped and glass fronted commercial spaces, to which goods access has not been thought about. Most likely all that space, being unsuitable for such as studios / workrooms or workshop / industrial (where the big demand is), would all be taken up by uses supporting the residential, things like creches, gyms, health clubs, beauty treatment places. That's what's happened at Barratt's Greenland Place in Deptford where the so called Cannon Wharf Business Units have filled with prosperous suburb support services, all good things, but in the wrong place, making it feel like a residents enclave, a little neighbourhood unit, rather than a shared piece of the city. Since Southwark have committed, it seems (and we hope), to growing the Old Kent Road as a high street (even though they keep giving permissions that denude it), it would be logical / good / better to encourage such uses as those to go to that high street, push for there to be abundant accommodation for them there, and in the secondary high streets in the area (which should also be protected and expanded), including Peckham Park Road. Better to make most of this space, and much more that can be achieved in the scheme, into light industrial / workshop and studio accommodation.

It's crucial to get the message across that this Malt Street site is about one third (perhaps more) of the right now (mostly) vacant and available land in the OKR OA, that can be developed without displacing residents and / or businesses (and even this piece has only been made available by pushing out a big maintenance contractors depot, and still Lascot will need kicking out). There is close to nil decant space within the area's existing industrial and workroom / studio accommodation, as we are effectively fully occupied across the OKR area. That means that, even ignoring strong competition from new and incoming businesses, if this development fails to deliver a range of accommodation, including for light industrial, in substantial quantities, then we can kiss goodbye to many businesses as they get expelled to make way for re-development elsewhere in the area. If it gets flunked on the Malt Street site, if it doesn't incorporate industrial, then it looks likely that much slaughter of the existing OKR economy will be inevitable.

I am not commenting on massing, but I note that the scale of buildings implies less residential use immediately to the north (particularly the Asda car park), should redevelopment happen there (very likely), because that's where the shadows will fall from substantial towers. That's fine, as a good scenario could include a band of dense industrial there, able to take more vehicle intensive activities (the likes of builders merchants, courier depots, dark kitchens, brewery) than would be acceptable within such as the Berkeley project, perhaps accessed from a reinstated Olmar Street (extending from its residue still there at the current end of Ossory Road, across to Malt Street).

Public space is a challenging matter. Berkeley sell their paved and shrubbed expanses as 'green spaces', even though they are not really. No doubt they will be popular parts of the scheme on paper, as they look enticing, but we think they are way too big and without enough purpose. If it's a choice between extra

expanses of paving / planter areas with a few more trees, and space to house some good businesses, providing diverse jobs, making a more mixed piece of city, not just a new steroided suburb enclave, then we think the business space wins! After all, within 500m of the Berkeley site there are about 30 green spaces, including pocket parks, generous chunks of amenity landscape, green squares, a recreation ground and 4 decent scale parks amongst them the eastern end of giant Burgess Park. Within that 500m zone there are about 22ha of green space, and no shortage of paved areas. Also, of course, the full 56 hectare extent of Burgess Park can be got to easily, its eastern entrance being just 100m away from the west end of the site. Formal parks with a 10 minute walk are Burgess Park, Surrey Canal Linear Park, Bird in Bush Park, Brimington Park, Patterson Park, Caroline Gardens. Leyton Square Recreation Ground is nearly adjoining, with wonderful mature trees.

Rather than spending on such giant shrubbed-up public spaces, I think it's better to create really good workshop, studio and workroom accommodation. In the version we scoped out you still get a generously sized square and traffic-free areas, wide path links, still plenty of space for trees and to sit, enough space for playing, but there is less overall spend needed on construction and maintenance of dress-up landscaping, and so money could be called for to get the link to Ossory Road going, to boldly improve the mess of paths, fences and badly located gates that compromise access to the existing Surrey Canal Park and Burgess Park, and then a proper programme of improvements to the amazing network of green spaces that weave through the estate could be got rolling, and all the connections sorted, starting with next door Leyton Square.

The first (heartening) observation I have had on all this from one of our members who also lives in the area goes like this:

The proposal to built in sheds and yards sounds totally good to me and would at least in some way embed the scheme with the existing context. There should be reasons for locals to go to that new part of their neighbourhood. Some vague bit of green or strange piazza in front of fancy glass buildings will achieve the opposite. Spaces that can work and double up for other uses at eg weekends would be good. Dense with shop, workshop fronts facing onto public space and trees where ever they can be fitted would be good. Some of the existing public green spaces that are part of estates such as Leyton Square could do with investment. Spread the investment wider than their site.

Maybe all the industrial / workshop and studio / workshop accommodation could be sold / passed over to trusts to run in perpetuity. Or the industrial part could go to someone more straight-forward like Capital Industrial. Developing this, getting Berkeley to buy into it, could be helped along by the Good Growth Fund perhaps, and even better if Housing Zone resources could be offered to the development on condition that Berkeley embrace building a piece of city rather than a pumped up housing estate. A bundle of superb industrial tenants could be found without much difficulty. These days that's easy.

A more localised suggestion is to push hard for the link from Haymerle to Ossory, straight away. Initial thoughts go like this:

The Berkeley scheme does not indicate anything about how to achieve the Haymerle to Ossory link, one of the two required links north, not even when that end of their proposed development (it's a later phase) happens. They just leave a landscaped gap so you can get to the retaining wall and fence and peep into the Asda car park! But I think they should be pushed to make it happen, soon in fact, before they even build their first phase. It would be a great improvement gesture, making many people's lives quite a bit more convenient. And the other link, from Malt Street, will not happen for several years, because it goes right through their first phase. Surely it's within the capability of the mighty Berkeley and the magnificent Southwark (helped by the GLA), to negotiate an Ossory link route with Asda, and modestly with ABC. It only needs a few sq m of the corner of ABC's yard, maybe it can even happen without that, and it only needs a

bit of juggling around of Asda parking spaces, by my assessment only loosing 12 or 15. If persuasion failed then that would be a good reason for CPO. My goodness, it doesn't even destroy peoples lives!

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