

# IssuesOptions\_Representations5

<i>Objector Ref</i>	<i>representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
1	1	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			
1	26	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	Has written "No" against Surrey Square Option 2.	Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.
2	2	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			

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2	27	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Sustainable Design Opt	<ol style="list-style-type: none"> <li>1. Code for susatainable homes Level 6 throughout.</li> <li>2. Providing allotments</li> <li>3. Rainwater harvesting.</li> </ol>	<p>Noted. The Preferred Option on Burgess Park will be based on Option 2 to 5 in the Issues and Options report. The preferred option will include five themes including a learning park which could include growing food locally.</p> <p>The AAP seeks to meet Code for Sustainable Homes Level 4 which is ahead of national requirements. The need for sustainable homes must be balanced against the need for the AAP to be financially viable. Code for Sustainable Homes Level 6 will not be financially viable at the present time.</p> <p>Rainwater harvesting will be considered as a water saving measure within the Preferred Options Report.</p>

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2	28	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>1. Planting should be predominantly mature species.</p> <p>2. The cricket nets need improving and maintaining.</p> <p>3. Renewable energy should be in the park</p> <p>4. Yes quality demolition waste should be reused - paving stones, etc., but not used as an excuse for dumping rubble in the park</p>	Noted
2	29	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Car Parking Opt 1	<p>1. Car parking should be minimised.</p> <p>2. A green travel plan should be developed aimed at reducing the need for cars i.e. car clubs - free membership</p>	<p>All of the transport options presented in the report aim to reduce car parking provision by creating attractive and walkable streets, as well as ensuring the provision of an efficient public transport network, which links key public services.</p> <p>A Green Travel Plan will be considered as part of the Preferred Options Report.</p>

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2	145	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Tram Opt 2	The key aim with the tram is that it should use an existing road through the park (i.e. West Way) there should be NO MORE roads in the park.	Noted. The final decision on the tram route will be made by TfL.
3	3	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Size of Homes Opt 1		
3	30	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9		There should also be housing for the elderly should they wish to choose.	Section 2.2.15 of the Issues and Options Report seeks to provide all homes meeting 'Lifetime Homes standards'. These homes are designed to be flexible enough to meet the changing life-time needs of residents, such as when people get older. In addition in accordance with current guidance at least 10% of all new housing will be designed to meet the needs of vulnerable groups, including the elderly and disabled. This approach will be taken forward in the Preferred Options report.

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4	13	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			
4	60	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Sustainable Design Opt	Beware of green/brown roofs just encouraging pigeons and rats.	Noted.
4	61	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		Burgess Park: Need to be careful not to create a "yuppie row" along the park that only rich people get the views. Will not contribute to sustainable community.	The AAP aims to create a mixed community with a mix of tenures, incomes, ages and household types.

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6	5	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			
6	43	IO 2.2 IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8		The MPA notes that paragraph 2.2.6 indicates that the redevelopment of the Aylesbury Estate will provide approximately a total of 5,000 homes including 2,500 social rented housing units and 2,500 private housing. The MPA also notes the proposed provision of around 300 to 500 intermediate housing units that will be made for key workers including 'nurses, teachers, fire fighters and police officers'.	Noted.
6	44	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Tenure Mix Opt 1	The consultation seeks views on potential Tenure Mix. The MPA supports the adoption of Tenure Mix 1: Minimum Private Housing Provision, which will maximise the number of affordable and key worker units to be provided.	Noted. The council's preferred option tenure mix however is closer to option 3. A higher proportion of private homes is need to ensure that the redevelopment is financially viable.

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6	45	IO 2.2		<p>Design Principles</p> <p>Reference has been made at paragraph 2.2.15 in relation to standards for new housing which states that all new housing delivered at the Aylesbury Estate will be required to adhere to the 'Secured by Design' principles.</p> <p>The MPA is committed to the creation of a safe and secure environment through reducing crime and the fear of crime, and welcomes this reference. In addition, we suggest that the scope should be broadened to include the public realm, and thus the layouts to be secured in the sections relating to Safer Streets, Squares and Parks. Officers are available to discuss 'Secured by Design' as the master plan work progresses and more detail becomes available.</p> <p>The MPA confirms that all development schemes should incorporate measures in their design, layout, siting and landscaping to minimise the risk of crime and maximise security.</p>	<p>Noted. Issues of crime and fear of crime will be considered in all aspects of the development. Public realm and layouts will be designed to minimise fear and risk of crime by providing ground floor frontages with windows providing passive surveillance.</p>
		IO 2.3			
		IO 2.4			
		IO 2.5			
		IO 2.6			
		IO 2.7			
		IO 2.8			

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6	46	<ul style="list-style-type: none"> <li>IO 2.7</li> <li>IO 2.8</li> <li>IO 2.9</li> <li>IO 3.1</li> <li>IO 3.2</li> <li>IO Glossary</li> <li>IO Indices</li> </ul>		<p>Community: Enhanced Social and Economic Opportunities</p> <p>The MPA notes that the sections on Local services discuss how local facilities should be located in the Aylesbury area. The facilities should include facilities for local police offices such as a base for the Neighbourhood Teams, and possibly a shop unit or space within a community facility where police can provide a local service for licences and other community support activity.</p>	<p>The enhanced social and economic opportunities chapter includes proposals for spaces for community facilities. Such facilities may include space for local police officers.</p>



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7	6	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	<p>We would like to protest, in strongest terms, against being excluded from the consultation process during the first two stages of the Aylesbury Area Action Plan preparations, particularly the issues and options stage. Residents of our estate are going to be directly affected by the physical changes in our part of the Aylesbury Area, outside of the Aylesbury Estate itself. We are really concerned about our interests not being represented in the decision-making process, as the Aylesbury Area Action Plan Issues and Options report states that the “responses to this document will be very important in determining the preferred options to take forward”, while the Issues and Options Consultation Plan mentions that the results of a large consultation on the phasing options (carried out in July) “will inform the next stage in the preparation of the AAP, which is the selection of the preferred options.”</p> <p>The Consultation Plan and the introduction to the Issues and Options report (published in September) refer to the “extensive consultation already undertaken”, the “ongoing and informal” process taking place and to the formal consultation set to commence on 5th October 2007.</p> <p>Alas, this does not tally with our experience – we first learned about having a stake in the plan and our estate being part of the Aylesbury area, in the last week but one of the issues and options stage of the AAP, when our Secretary came across a copy of the Consultation Questionnaire at a Walworth Community Council meeting on the 7th November, which he attended on, what we thought at the time, was an unrelated business. Even then, he only picked it up out of interest in what was going on in the neighbouring area, without realising that we are supposed to be among the consultees. In fact, according to the minutes of Walworth</p>	<p>Noted. While letters were sent out to the tenants and residents associations, the council acknowledges that residents around Surrey Square could have been better involved in the consultation process. Two meetings have taken place with residents and representatives from the T&amp;RAs around Surrey Square and the council will endeavour to ensure that residents around Surrey Square are included in all future consultation about the area action plan.</p>

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Community Council meetings for 2007, at no point were the Members of the Community Council actually provided with the Aylesbury Area Action Plan Issues and Options document in its entirety. Officers from the Regeneration Department presented updates on selected issues and options and on the consultation process, but not even the East Walworth Councillors were informed of the proposed changes to the physical environment in our ward.

The response deadline for the questionnaire is Friday, 16th November 2007. As it came to our attention only last week, we do not have enough time to respond. The plan involves complex, interlinked issues, which need thorough analysis for us to understand the full implications for the residents of Kinglake. We need to inspect other documents which form the context of AAP, as they may have some bearing on the issues relating to our concerns, such as the Local Development Framework papers, and the Sustainable Community Strategy. In addition, we cannot convene an open TRA meeting within the time frame to obtain an approval to represent the interest of Kinglake residents formally.

Despite Southwark Council's "ambition to go beyond the statutory requirements, to engage more continuously and intensively and enable those people with a stake in the area to be able to participate and influence the preparation of the AAP," expressed in the Consultation Plan, we have not been included in any form of consultation whatsoever, nor, to our best knowledge, have any other residents, nor their representative bodies in the part of the Aylesbury Area surrounding the Aylesbury Estate. This is in breach of our statutory rights set out in the 2004 Planning and Compulsory Purchase Act and may undermine the development plan document status of the Aylesbury AAP.

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Part of the problem seems to be whether or not Kinglake belongs to Aylesbury. Last re-organisation of housing management separated us from Aylesbury Estate in terms of housing services. Various officers, attending our meetings at the time, stressed the administrative difference and we were told that we are not included in the Aylesbury New Deal for Communities. Previous Aylesbury plans followed this and the AAP is the first plan in which we are explicitly included. We expected any developments in and around Kinglake to be announced separately and, as an association recognised by the council, we certainly expected to be informed.

We are the residents of the Aylesbury Area, but not of the Aylesbury Estate and the element of confusion between the two – evident in even in the Issues and Options documentation, which in many places uses the terms interchangeably – makes us believe that the authors of the plan did not seriously consider us. We seem to be included within the boundaries of the plan, but not included in the decision making process.

A number of issues in the document have direct impact on us, such as transport and the street layout, but one of them stands out. All of the residents, and other interested parties, in our part of the area we managed to contact in the short space of time, seem to feel strongly about it. It is the Surrey Square issue in the Public Life: Better and Safer Streets, Squares and Parks section of the Issues and Options report, putting forward a strong possibility of building blocks of flats on Surrey Square Park.

It is clear from reading the Issues and Options report and the supporting documents, that the Council planners favour Surrey Square Option 2. Option 1, even in its minimalist form, offers many merits (some of them outlined in the general discussion of the Surrey Square issue

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earlier in the document). Yet almost nothing is presented in this option, whereas Option 2 goes into a lot more detail, 'flagging up' such benefits as "improved internal layout and habitat provision." It is difficult to envisage how building on top of a half of the present space helps to achieve these merits, unless mechanical symmetry and reducing the amount of 'untidy' greenery mean 'improved layout' and the habitats are the ones for humans!

Surrey Square Park is a valuable amenity for many people in the vicinity. Children in particular have few places to play, especially on the Kinglake Estate. A recent survey carried out by Groundwork Southwark in partnership with KTRA, identified a need for kids to have somewhere 'local' to play. Parents are unwilling to let their children out, unsupervised, unless they are nearby. Thus, although Burgess Park has recreational facilities to offer, it is too far away to meet the need of a local play area, and provision of green-finger routes will not compensate for this.

KTRA understands that the recreational facilities on Surrey Square Park are in great need of improvement, and has been active in raising money to address this. Hard work of our committee over the last 2 years secured CGS grants to improve the play area outside Hadlow / Leysdown Houses, and the west-most ball cage in the park complex.

We are unable to present our arguments in any detail, even just on this one issue, as one week is just not enough time for a consultation of an estate.

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7	144	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	<p>A number of issues in the document have direct impact on us, such as transport and the street layout, but one of them stands out. All of the residents, and other interested parties, in our part of the area we managed to contact in the short space of time, seem to feel strongly about it. It is the Surrey Square issue in the Public Life: Better and Safer Streets, Squares and Parks section of the Issues and Options report, putting forward a strong possibility of building blocks of flats on Surrey Square Park.</p> <p>It is clear from reading the Issues and Options report and the supporting documents, that the Council planners favour Surrey Square Option 2. Option 1, even in its minimalist form, offers many merits (some of them outlined in the general discussion of the Surrey Square issue earlier in the document). Yet almost nothing is presented in this option, whereas Option 2 goes into a lot more detail, 'flagging up' such benefits as "improved internal layout and habitat provision." It is difficult to envisage how building on top of a half of the present space helps to achieve these merits, unless mechanical symmetry and reducing the amount of 'untidy' greenery mean 'improved layout' and the habitats are the ones for humans!</p> <p>Surrey Square Park is a valuable amenity for many people in the vicinity. Children in particular have few places to play, especially on the Kinglake Estate. A recent survey carried out by Groundwork Southwark in partnership with KTRA, identified a need for kids to have somewhere 'local' to play. Parents are unwilling to let their children out, unsupervised, unless they are nearby. Thus, although Burgess Park has recreational facilities to offer, it is too far away to meet the need of a local play area, and provision of green-finger routes will not compensate for this.</p>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p>

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7	IO 2.5	Surrey Sq Opt 2
	IO 2.6	
	IO 2.7	
	IO 2.8	
	IO 2.9	
	IO 3.1	
	IO 3.2	

Opposed Option 2 for Surrey Square on grounds of the reduction of biodiversity, the loss of amenity for the many people who use the park for informal play, picnicking and ball sports, the lack of congruence of this proposal with the need for action to reduce obesity and improve exercise.

Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.

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8	158	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>On page 11 I criticised the consultation exercise for failing to contact me direct, which is incredible since I live opposite the park. I learnt about the consultation only through the alertness of a neighbour and I observed that it is likely that many other people who are stakeholders in the park will also have been left unaware of these proposals. To these criticisms I must clearly now add another that the technology which you employed for electronic responses has failed since it has apparently erased my original comments.</p>	<p>Noted. While letters were sent out to the tenants and residents associations, the council acknowledges that residents around Surrey Square could have been better involved in the consultation process. Two meetings have taken place with residents and representatives from the T&amp;RAs around Surrey Square and the council will endeavour to ensure that residents around Surrey Square are included in all future consultation about the area action plan.</p>



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9	8	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>1. The document is well set out, easy to read and makes good use of diagrams and photographs, in particular the inclusion of a key diagram at Figure 1.</p> <p>2. We welcome the use of "Fact Boxes" along side certain phrases/options as a helpful aid to those that are not too familiar with planning terms/jargon.</p> <p>3. Paragraph 1.3.8 – As you are bringing forward this Area Action Plan before your Core Strategy, it might have been helpful to say here that the document will also be consistent with your Unitary Development Plan which was adopted earlier this year. However, you do refer to taking into account your Council's Sustainable Community Strategy and other plans for nearby areas.</p> <p>4. The inclusion of a "SWOT Analysis" (1.3.19) up front in the document is considered to be a useful scene setter which helps put issues into context, and hopefully from this enable the reader to gain a more thorough understanding of the issues facing the Aylesbury estate and its regeneration.</p> <p>5. The document provides an overall strategic vision for the area, which encompasses the Aylesbury Estate and its surroundings. This can be seen in the place making objectives which are grouped under the 4 headings of better homes, public life, connections and community. This is followed up through the reference to delivery and sustainable development objectives - with linkages to the Sustainability Appraisal. This overall approach is welcomed as it appears to embrace the principles of the new planning system.</p> <p>6. Section 2.1 details how to use the report in terms of commenting on it. We consider that</p>	<p>Noted. The relationship between the AAP and the UDP and Core Strategy will be clarified in the Preferred Options Report.</p>

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the use of the ratings box is helpful, and hopefully as a result of this you will receive more meaningful responses, as it looks at how the options are performing against the key objectives of the document. Is this information backed up by what is in the Sustainability Appraisal? A minor point is that readers have to keep referring back to the key diagram and explanation throughout the document which could lead to some confusion.

7. The options are rather detailed/specific in their nature. Given this, do you think that the provision of such detail at this stage may curtail the responses received/discourage readers from providing alternative options? It will also be interesting to see how you formulate your Preferred Options given the detail shown at this early stage of the DPDs production.

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9	47	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Sustainable Design Opt	Part of the option at 2.3.22 (sustainable design and construction) is to have all new dwellings built to at least level 4 of the Code for Sustainable Homes. As this is ahead of national guidance you will have to provide robust justification at Examination that this is achievable throughout the estate.	Noted. The council is preparing a sustainable design and construction strategy as part of the AAP. This includes an energy strategy centred around the provision of CHP and district heating. The energy modelling which has been undertaken demonstrates that new build within the masterplan area will be able to achieve a 44% improvement on the Buildings Regulations ie sufficient to meet Code Level 4.
9	48	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		Paragraph 2.7.11 onwards explores options relating to the Cross River Tram. Only one of the three options appears to be in line with the Transport for London consultation. Have you held discussions with TfL as to whether the other proposed routes would have their support? Are there any funding and implementation issues arising from proposing alternative routes?	TfL originally consulted on options 1 and 2. The council has discussed the possibility of option 3 with TfL who are currently examining the business case. A decision on the tram route will not be made until the end of 2008 at the earliest. The masterplan has sufficient flexibility to be able to accomodate any of the route options.

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9	49	<ul style="list-style-type: none"> <li>IO 2.7</li> <li>IO 2.8</li> <li>IO 2.9</li> <li>IO 3.1</li> <li>IO 3.2</li> <li>IO Glossary</li> <li>IO Indices</li> </ul>		<p>Part 3 of the document asks how can the proposed changes be delivered and provides a set of options around this. Do you consider members of the public/other stakeholders are knowledgeable enough to make such fundamental decisions and is the ultimate decision within their control? In view of this are these realistic and achievable options? These questions could also be asked about the phasing options put forward.</p>	Noted.

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10	9	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>As far as the Draft Supplementary Planning Document is concerned, the provision of utility infrastructure, including pipes and cables, has not been considered in the document. Thames Water recommend that this issue is included in accordance with paragraphs B3-B8 in Policy Planning Statement 12.</p> <p>Thames Water need to plan in advance the need for infrastructure as we have been advised that we are unable to seek upgrades via the Section 106 route (Town &amp; Country Planning Act).</p> <p>As a consequence Thames Water has very limited powers under the water industry act to prevent connection to our network where insufficient capacity exists and where needed, we would rely on the Local Authority to include a Grampian style condition.</p> <p>It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water &amp; sewerage infrastructure. Where there is a capacity problem and Thames Water (or any successor) have no planned improvements, the Local Council will require the developer to fund appropriate improvements that must be completed prior to occupation of the development. Network upgrades can take up to 18 months and where additional funding from our regulator is required up to 5 years lead in times may be necessary.</p>	Noted. The AAP will be supported by detailed technical studies on infrastructure requirements.

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10 | IO 1.1  
| IO 1.2  
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| IO 2.1  
| IO 2.2  
| IO 2.3  
| IO 2.4

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11	50	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>Flood Risk Management</p> <p>We are pleased to note that all comments and issues raised in our previous consultation have fully been incorporated in this document.</p> <p>It is commendable to note that you have already undertaken a detailed flood risk assessment and the preparation of SFRA is in the process. The SFRA should inform the sustainability appraisal and identify opportunities for reducing flood risk. This will enable the council to apply the sequential test and allocate appropriate sites for development.</p> <p>We welcome the weight supporting text has given to flood risk management including urban surface water flooding. We are in support of paragraphs 2.2.20 -2.2.22 which give a succinct examination, explanation and justification of flood risk levels. We hope the Area Action Plan will have strong policies which offer the developers a guidance of what will be expected of them when submitting development proposals and planning applications.</p> <p>Information on improving the flood performance of new buildings would be obtained from Flood resilient construction (Defra May 2007).</p> <p>Surface Water Flood Risk</p> <p>We welcome the proposal for new development to include a provision for the adequate environmentally acceptable measures to deal with surface water run-off or discharge. The Environment Agency requires discharge from the proposed development site to mimic that of the Greenfield run-off and we note that the sustainability appraisal has taken this into account.</p>	Noted.

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<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
11	51	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>Burgess Park Options Option 3 and Option 5</p> <p>Option 3 is the most appropriate option for the area though it would be reinforced further by including some good elements of Option 5 which include re-using demolition material to landscape the park and use of the park as a source of renewable energy. This would link well with our previous proposals of improving and linking Burgess Park to local residents and wider London population and visitors. In particular we see the regeneration as an opportunity for the lake in Burgess Park to become a major educational and community resource. This would increase environmental recreation in and around Burgess Park e.g. by increasing access to fishing and environmental education. We would recommend that any future landscape design of the Park be in relation to the water space of the lake and consider how the water effect can enhance the passive enjoyment of the park. A more informal / softer landscape that connects to the water edge would add a quality of life value for visitor enjoyment and could be an environmental and economic benefit to new development in the area.</p> <p>The Council should seek to maintain and look for opportunities to enhance the setting of and increase space for the lake. In considering development proposals it will:</p> <ul style="list-style-type: none"> <li>a) Ensure the protection of landscape features that contribute to the setting of the lake</li> <li>b) Seek to protect and enhance existing views of the lake</li> <li>c) Pay special attention to the design of development located on lakeside settings to ensure that it respects and makes a positive contribution to the setting of the lake</li> <li>d) Ensure that the quality of the water</li> </ul>	Noted.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
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environment is maintained  
 e) Seek opportunities to improve public access to and alongside the lake and ensure that existing public access is improved and maintained

11

52 IO 2.5 [REDACTED] Street Layout Opt 2

- IO 2.6
- IO 2.7
- IO 2.8
- IO 2.9
- IO 3.1
- IO 3.2

We support option 2 which proposes three green fingers running from Burgess Park into the Aylesbury area. This would augur well with our proposal of improved environmental links (e.g. cycle ways, walkways, extensions and links to existing green space areas) between Old Kent Road, Elephant & Castle, Walworth Road and Peckham, providing new and attractive green grid style development. This option also links well with Transport Option 1 and 2 which seek to prioritise pedestrian and cycle access and street beatification respectively.

Noted.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
11	53	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Sustainable Design Opt	We agree with the option of a greener Aylesbury area although more other options need to be explored. It would be preferable to break this option into two parts. Part one would encompass water efficiency, building materials and reducing waste and part two would cover climate change and air quality. Improving Biodiversity would best be suited in Biodiversity options 1 or 2. This would link with our previous suggestion of incorporating high standards of sustainable construction in the new development, aiming for high scores on Code for Sustainable Homes and ensuring new development incorporates sustainable drainage systems. It would be a major opportunity to link this to environmental improvement across the action plan area for present and future generations, assessing the impacts of climate change and how the plan can ensure new development is compatible with a changing climate.	Noted. The preferred option will look at the development as a whole meeting Code for Sustainable Level 4 rating which is ahead of national policy. All elements relating to sustainable design and construction would be best presented in a single section. Biodiversity in this section relates to the potential of including ecological enhancements into the design of new buildings.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
11	54	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Biodiversity Opt 2	We support option 2 which seeks not only to protect but also improve and enhance biodiversity. This is in line with our previous comments, PPS 1 and PPS 9. Development should be seen as a tool of environmental enhancement rather than as a source of environmental degradation, as in the past. PPS1 Paragraph 19 suggests that adverse environmental impacts should be avoided if possible, mitigated against, if unavoidable, and/or compensated if mitigation measures are only partially successful.	Noted.
11	55	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		The sustainability appraisal and the AAP are quite detailed and have considered our concerns for flood risk management, sustainable water resources, biodiversity and renewable energy. If implemented well, it will transform the local community way of life and provide environmental enhancement and protection	Noted.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
11	108	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		Conclusion The sustainability appraisal and the AAP are quite detailed and have considered our concerns for flood risk management, sustainable water resources, biodiversity and renewable energy. If implemented well, it will transform the local community way of life and provide environmental enhancement and protection	Noted.

12	11	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			
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<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
13	12	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9		<p>Tenure</p> <p>None of the housing options conform with the primary requirement in local and regional plans that 50% of new housing shall be affordable . (Replacement housing cannot be counted towards the 50% figure). All the new housing on the Aylesbury will be market housing whichever option is chosen. Other planning requirements such as creating mixed communities should be secondary. I would like to know what consideration is being given to new Government policy on housing, to PPS 3 and to the Mayor's Housing Strategy all of which give greater priority than previously to affordable housing and particularly social rented housing. There is already an over-supply of market housing, the necessity is to focus on social rented housing which is needed desperately by the people of Southwark.</p>	<p>The policy of both the London Plan (and the Southwark Plan) is that estate renewal schemes should not result in any loss of affordable housing housing. The Mayor's Housing SPG suggests that where the need to create mixed communities is particularly important or in order to help make such schemes viable, replacing some social rented homes with intermediate homes may be an option. All the tenure mix options in the Issues and Options Report met these requirements. The council is undertaking financial modelling to assess these options. Whichever option is chosen, it will be critical that the AAP can be delivered.</p>
13	56	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Size of Homes Opt 1	<p>Size</p> <p>42% of homes to be 3 bed + to address previous undersupply of larger homes and meet backlog of need.</p>	<p>Noted. The Size of Homes Option is based on borough-wide housing needs and our best current estimate of the housing of existing social rented tenants on the Aylesbury Estate.</p>

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
13	57	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>Burgess Park</p> <p>The provision of financially accessible youth, sport and leisure facilities should be a high priority. However, it is premature to be choosing options when there is a wider consultation being undertaken by Groundwork Southwark and the Burgess Park Community Development Trust. Furthermore, Burgess Park is a precious amenity enjoyed by many residents in Southwark, not just residents of the Aylesbury. It is imperative that the exhibition material is displayed at local libraries, any local forums in Walworth and Camberwell as well as Faraday and for the next consultation round there should be an exhibition in Burgess Park itself.</p>	<p>Noted.</p> <p>The final AAP will include an Open Spaces Strategy which will set out the high level plans for open spaces in the area including Burgess Park. However, the more detailed plans for the Park will be drawn up with further consultation with Groundwork Southwark, the Burgess Park Community Development Trust and local communities.</p> <p>The Issues and Options report along with the questionnaire was available in local libraries, Council Offices and one stop shops across the borough. The exhibition was held in Thurlow Lodge in close proximity to Burgess Park.</p>
13	58	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Tram Opt 1	<p>Cross River Tram</p> <p>The housing options and the phasing of the development appear to depend on the route taken by the Cross River Tram. What is not being considered within the Options is the option that TfL will be unable to fund the tram and therefore that it will not proceed – at least not within the timescale of the Aylesbury development.</p>	<p>The scenario of no tram will be considered in detailed transport modelling. This will look at increasing the number of buses on Thurlow Street. Initial work has shown that similar improvements in public transport accessibility levels (PTALs) can be achieved by improving bus services.</p>

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
13	59	<ul style="list-style-type: none"> <li>IO 2.7</li> <li>IO 2.8</li> <li>IO 2.9</li> <li>IO 3.1</li> <li>IO 3.2</li> <li>IO Glossary</li> <li>IO Indices</li> </ul>		<p>Community (1-10)</p> <p>There is a danger of gentrification, with existing local facilities and shops disappearing and the replacement being too expensive for existing residents. There needs to be a social impact assessment of the impact of choosing each option on the local small businesses, the community and voluntary sector and general social infrastructure.</p> <p>There is a danger of over-development. With the doubling of density that is proposed in all options, what measures will be undertaken to sustain the existing infrastructure and facilities</p> <p>There has been insufficient consultation with residents and local traders outside of the Aylesbury estate who now find themselves inside the AAP.</p>	<p>An Equalities Impact Assessment has been carried out. The AAP aims to create a mixed community with a mix of tenures, incomes, ages and household types.</p> <p>Detailed work has been carried out to assess the need to upgrade the infrastructure such as utilities to support the development. Non-residential uses such as health, education, employment etc are also included within the AAP. As part of the AAP process, we will also be undertaking a health impact assessment.</p>
13	146	<ul style="list-style-type: none"> <li>IO 2.3</li> <li>IO 2.4</li> <li>IO 2.5</li> <li>IO 2.6</li> <li>IO 2.7</li> <li>IO 2.8</li> <li>IO 2.9</li> </ul>	Housing and Open Space	<p>Housing and space standards</p> <p>There should be no loss of play and green Space, and no reduction in internal space for existing residents. Back and front gardens may be private space, but are very important as green lungs.</p>	<p>Further work has shown that there will be no loss of existing open space.</p>



<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
13	147	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Sustainable Design Opt	Sustainable Design The only option is really a mother and apple pie list. There need to be specific options for renewable energy ranging from 20% renewables to a zero-carbon development.	Noted.  The preferred option will promote the use of renewable energy and seek zero carbon growth.
14	15	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Arts and Culture Opt 2	1. A modest well designed multi-purpose community centre with a performance area, film screen and activity rooms would provide participation opportunities for groups excluded from, or less able to access, mainstream services, such as younger or older people.  2. Cultural activities can drive regeneration and make people proud of their communities and of themselves. Widening cultural opportunities can improve community safety - for example by diverting attention away from acts of crime. Local activities can promote social inclusion, bringing together the new community, where good quality, accessible local cultural facilities are key to creating communities where people will want to live and work.	1. Noted. 2. Noted.

<i>Objector Ref</i>	<i>representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	16	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			
15	62	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>Introduction Paragraph 1.1.3 mentions improved transport links together with improved park, local green space and play areas all of which are to be encouraged and welcomed by Natural England.</p> <p>Natural England is also pleased to see the links and consideration to other emerging local Area Action Plans, for example the Elephant and Castle and Peckham Plans.</p>	Noted.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	63	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9		<p>P2: Public Life – Better and Safer Streets</p> <ul style="list-style-type: none"> <li>•To improve Burgess Park;</li> <li>•To promote well designed and safe streets and parks; and</li> <li>•To provide better management and maintenance of public spaces.</li> </ul> <p>All of the above are welcomed and supported and the inclusion of better management and maintenance of public spaces, which by definition must include Parks and Green Spaces, is to be commended and encouraged.</p>	Noted.
15	64	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		<p>P3: Connections – Improved Public Transport Links</p> <ul style="list-style-type: none"> <li>•To improve public transport links;</li> <li>•To make the wider Aylesbury area accessible for all; and</li> <li>•To provide high quality pedestrian and cycle routes.</li> </ul> <p>Again the above Objectives are welcomed and supported.</p>	Noted.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	65	IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4 IO 2.5 IO 2.6		Sustainable Development Objectives Paragraph 1.3.26 lists the sixteen Sustainable Objectives for the Plan which has been previously commented upon; however, Natural England's response would be that we are broadly supportive of the Objectives listed and especially the following; SDO 6 SDO 13 SDO 16	Noted.
15	66	IO 2.2 IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8		Issues and Options Paragraph 2.2.24 gives consideration to Air Quality and Biodiversity and this inclusion is welcomed.	Noted.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	67	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9		<p>Mix of Homes: Tenure Mix</p> <p>Natural England does not wish to offer any formal representations on this issue, other than to reiterate our comments in respect of new housing provision and to help alleviate open spaces deficiencies the Council may find the following comments with regards to Accessible Natural Greenspace standards (ANGST) of use.</p> <p>Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:</p> <ul style="list-style-type: none"> <li>•No person should live more than 300 metres from their nearest area of natural green-space;</li> <li>•There should be at least one accessible 20 hectare site within 2 kilometres;</li> <li>•There should be one accessible 100 hectares site within 5 kilometres;</li> <li>•There should be one accessible 500 hectares site within 10 kilometres.</li> </ul> <p>This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough.</p> <p>This can assist the Council with identifying the needs of the local community and increase awareness of the value of accessible natural Greenspace, along with the levels of existing</p>	<p>Further work has shown that there will be no loss of existing open space and the AAP can achieve about 1.8Ha per thousand population. While this is slightly below 2Ha, the provision of new open space will be of significantly higher quality.</p>

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<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
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green-space provision, resources and constraints.

**Housing Types and Open Space**

Option 2 "Balance access to private, communal and Public Open Spaces" would be the preferred Option for Natural England, the consideration of roof gardens as a communal facility would meet the needs of the community whilst utilising the land resource to its maximum, and potentially helping to increase levels of biodiversity for the area.

**Sustainable Design and Construction**

Paragraph 2.3.22 refers to zero carbon growth for the area and therefore the Council may wish to give consideration to the BEDZED (BEDdington Zero Emission Development) scheme which should be able to provide useful information on reducing Carbon emissions.

Paragraph 2.3.32 refers to biodiversity, and gives consideration to bat and swift boxes together with green/brown roofs as well as living walls. These considerations would be welcomed and supported by Natural England and we would commend and encourage the Council to incorporate these features within the design specification for the Estate.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	68	IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1		<p>Open Spaces – Burgess Park Paragraph 2.4.30 recognises that the existing natural habitats could be improved further, and this recognition is commended and welcomed.</p> <p>Paragraph 2.4.33 looks at the future development and management of the park which is also welcomed and to be encouraged, Natural England is supportive of initiatives that provide development and enhancement potential for parks and green spaces and the provision of an agreed management plan for Burgess Park could be one way forward to achieve this.</p> <p>Surrey Square and other Local Open Spaces Paragraphs 2.4.34 to 2.3.35 consider improvements to Surrey Square, which are also welcomed and to be encouraged.</p>	Noted.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	69	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Street Layout Opt 2	Street Layout Options Option 2 seeks to put back the traditional connections of the estate as well as creating Green Fingers. This option still promotes walking and cycling whilst increasing the levels of green spaces and therefore biodiversity potential also, along with green links/corridors to Burgess Park.	Noted.



<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	70	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>Open Spaces: How can Burgess Park be improved to contribute to the Creation of a Successful Neighbourhood</p> <p>Option 2 – Enhance existing features and boundaries The proposed improvements include new planting and this Option has clear links to SDO 13.</p> <p>Option 3 - Reflect Community Diversity This Option includes elements of Option 2 but also provides diverse, non native planting and garden habitat opportunities with some educational opportunities also.</p> <p>Option 4- Healthier Living This Option links in to the health initiatives of the Plan and has the potential to link in further if it could be combined with biodiversity – such as in Option 2 which would help increase the usage of the Park.</p> <p>Mention is also made of enhancing the biodiversity of the area through green/brown roofs together 'living walls' along with improvements to other local green spaces, helping to ameliorate the possible loss of health schemes in Burgess Park. The consideration of green/brown roofs, living walls and enhancing the biodiversity of the area is to be welcomed and supported, and is in line with PPS 9 Biodiversity and Geological Conservation.</p> <p>Option 5 – The Park as an Environmental resource Reuse of products/waste from the demolition process could be used to alter the landscape of the topography of the Park, in conjunction with other Options, for example Options 2 and 4. Perhaps it would be possible to offset the costs of this through Planning Gain or Section</p>	Noted.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
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106 Agreements.

This would certainly provide a varied and mixed environment for species and biodiversity and may again help to increase usage of the Park.

15

71 IO 2.5 [REDACTED] Surrey Sq Opt 2

- IO 2.6
- IO 2.7
- IO 2.8
- IO 2.9
- IO 3.1
- IO 3.2

Surrey Square  
 Option 2 would be the preferred Option for Natural England as this option provides improvements and redevelopment of the Square together with a wildlife corridor/green finger, improving the biodiversity potential for the Square and provision of a walking and cycling route.

Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	72	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Biodiversity Opt 1	<p>Biodiversity</p> <p>Option 1 would prioritise public recreation but make nature more accessible and would be cautiously welcomed, as this would appear to be a presumption for the provision of recreational space over biodiversity.</p> <p>There would need to be careful monitoring of usage and any loss of biodiversity to recreation would need to be ameliorated/replaced at levels at least the same as those lost, and this may not always be possible through green/brown roofs.</p> <p>Option 2 Maximising Biodiversity The increased provision and variety of biodiversity and habitat is welcomed and would be supported by Natural England.</p>	Noted.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	73	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Transport Opt 1	<p>Connections: Improved Transport Links Paragraph 2.6.1 indicates the promotion of non private car usage, for example public transport, walking and cycling all of which are supported by Natural England.</p> <p>Option 1 – Promoting Walking and Cycling Priority routes including safe routes to school are welcomed and supported, and the Council should check out the “Walking Bus” initiative which could help with the safe routes to school.</p> <p>Option 3 – Public Transport Improvements to the public transport network together with the promotion and provision of walking and cycling opportunities are welcomed and the Council should, give consideration to the possibility of combining Options 1 and 3 which would be strongly supported by Natural England.</p>	Noted.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	74	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Tram Opt 1	<p>Cross River Tram – Routing</p> <p>Option 1 – Thurlow Street – Chandler Way This option is the most direct but would cut across Burgess Park, creating a new access road and creating/increasing fragmentation within the Park which would not be welcomed by Natural England.</p> <p>Option 2 – Thurlow Street – Albany Road This is a less direct route but has the advantage of using existing highways and covers more of the estate; this option is preferable to Option 1 as it does not increase fragmentation of Burgess Park</p> <p>Option 3 – Thurlow Street – Beaconsfield Road – Wells Way This option provides the most accessibility to public transport for the estate, covering the widest area and like option 2 creates less fragmentation than Option 1. Options 2 or 3 would be preferable to Natural England with Option 3, simply because it covers more of the estate and links more strongly/closely with SDO 16, being the overall preferred Option. However, were Option 2 to be the selected/preferred Option Natural England would have no objection to this route selection either.</p>	Noted.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	75	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Car Parking Opt 1	Car Parking Provision: Option 1 – Provide for appropriate levels of car parking The Council's aspiration to lower existing parking levels to meet existing ownership levels, and thereby help to encourage take up of public transport options is supported.	Noted.
15	76	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		Community: Enhanced Social and Economic Opportunities Natural England recognise the need for sustainable and viable communities, providing access to a range of services and facilities locally, however, we do not wish to offer any formal representation on these Options.	Noted.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
15	77	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>Interim Sustainability Appraisal Natural England is pleased to see the clear links and references to PPS 9 – Biodiversity and geology Conservation in the Sustainability Appraisal.</p> <p>Sustainability Issues for the Area Action Plan and Supporting Evidence (Table 4 – pages 26 to 34) lists the eighteen issues identified in respect of the Plan and these seem appropriate.</p> <p>Issue 12 relates to the need to maintain and enhance Open Space provision, and states that the Area Action Plan should consider how it can improve the provision of open spaces as well as improving biodiversity and access to nature, and this statement is both welcomed and supported.</p> <p>Issue 16 relates to the need to improve accessibility by public transport and minimise the need to travel by car, this aspiration is also supported and the Council's intention/consideration of lower parking levels, and in the future the Cross River Tram should help deliver this.</p> <p>Issue 18 relates to improving the walking and cycling infrastructure within the Area Action Plan, Natural England is supportive of any schemes or initiatives that promote walking or cycling and is pleased to see the Council's commitment to the infrastructure for the area.</p> <p>Sustainable Development Objectives Table 5 on pages 35 to 38 lists the sixteen Sustainable Development Objectives which as stated previously Natural England are broadly supportive of, especially the following;</p> <p>SDO 6 SDO 13</p>	Noted.

*Objector Ref*      *Representation Ref*    *Section*      *Option*      *Details of Representation*      *Officer Response to Representation*

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SDO 16



<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
16	17	<ul style="list-style-type: none"> <li>IO 2.7</li> <li>IO 2.8</li> <li><b>IO 2.9</b></li> <li>IO 3.1</li> <li>IO 3.2</li> <li>IO Glossary</li> <li>IO Indices</li> </ul>		<p>Shopping Option 1&amp;2</p> <p>The existing and projected growth in population in the AAP and spending growth in both convenience and comparison goods, relative to the existing retail provision does require the AAP to consider the need to improve the quantity, quality and accessibility of local shopping provision. Indeed such consideration should be reviewed holistically or borough-wide through the LDF process.</p> <p>We believe there is a need to improve the limited local convenience shopping facilities within the Aylesbury Estate and the existing surrounding retail centres Walworth Road (incorporating East Street) and Old Kent Road. It should therefore not be an "either/or" question.</p> <p>The Council recognises the need to ensure that "new development in the Aylesbury Area is closely and successfully linked to its surroundings" (para. 1.3.1). Tesco support the Council's aspiration to integrate the Aylesbury Estate with the surrounding area and emphasise the need to also consider Elephant and Castle scheme and the emerging development proposals on the periphery of the Estate, such as the emerging mixed use development proposals on the Tesco site at Old Kent Road in order to ensure that all residents of the Aylesbury Estate have good access to a range of retail facilities.</p>	<p>Noted. The AAP will support improvements to existing facilities. However, Shopping Option 1 will be developed as the preferred Option. It is important that any new retail does not impact adversely on existing retail centres such as the Walworth Road and East Street Market. Local retail capacity and supply and demand will therefore be considered in detail at a later stage to ensure any new retail in the Aylesbury area complements provision in these existing centres.</p> <p>The Council recognises the need to ensure that "new development in the Aylesbury Area is closely and successfully linked to its surroundings" (para. 1.3.1).</p>

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	18	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>Appendix – Detailed Comments</p> <p>Interim Sustainability Appraisal – October 2007</p> <p>1. There are a number of areas which we would suggest should be amended in order to make this appraisal more considerate of heritage assets and the wider historic environment.</p> <p>2. Table 2: Key messages of relevant plans and programmes No reference has been made to PPG 16 Archaeology and Planning. There may be unknown archaeological evidence not yet identified which may during the course of redevelopment of the area may be found. This possibility needs to be recognised in the SA process.</p> <p>3. In addition it is noted that reference has been made to the joint CABE English Heritage Guidance. The version quoted is out of date. A revised version was published in July of this year. The key message of this document is to understand the existing context, including the historic environment before establishing the appropriateness of tall buildings in an area.</p> <p>4. At the local level we would seek to ensure that any heritage assets and their settings are carefully considered as part of this SA process. For example we would suggest that any conservation area appraisals and conservation management plans that relate to land within the AAP or adjoining it are identified, assessed and fed into this SA. This includes the listing of the relevant documents in Table 2.</p> <p>5. Table 4: Sustainability issues for the AAP and supporting evidence We welcome the need to preserve, enhance</p>	<p>1. Noted.</p> <p>2. Noted. The relevant documents have been considered and included in Table 3 (Section 4 Sustainability Objectives, Baseline and Context) of the Sustainability Appraisal Report.</p> <p>3. Noted.</p> <p>4. Noted.</p> <p>5. Noted. Listed and unlisted character buildings located in the AAP were referenced in the Baseline Report. They have also been considered and reference has been made to them in Table 5 (Section 4 Sustainability Objectives, Baseline and Context) of the Sustainability Appraisal Report.</p> <p>6. Noted. The interventions proposed to improve safety in the streets will be based on the principles of good design. We will ensure an understanding and appreciation of the positive elements of the existing character and townscape features will influence any design interventions. We will be particularly sensitive if developing close to key historic streetscape features.</p> <p>7. Noted. In Table 6 (Section 4 Sustainability Objectives, Baseline and Context) of the Sustainability Appraisal Report the criteria questions have been modified to recognise the various types of heritage assets and their setting.</p> <p>8. Noted.</p> <p>9. Noted. In Table 7 (Section 5 Appraisal of the Preferred Options Report) of the Sustainability Appraisal Report the score for the 4th Place Making Objective, Community:</p>

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				<p>and protect the built heritage and the archaeological environment. However in the summary and source of evidence, there are concerns over the limited identification of heritage assets and their settings. For example no reference is made to the many various listed buildings found within or adjoining the land bounded by the AAP. Also of importance is the lack of recognition and therefore consideration given to the setting of the areas heritage assets. Finally the SA should also consider the value of the wider historic environment, which may not be statutorily protected but be of value to the local community. These unprotected features should be carefully considered as they could be used in conjunction with heritage assets to help provide a sense of place and inform the development of a sustainable community.</p> <p>6. We support the need to improve safety in streets and the public realm, but we would wish to ensure that interventions proposed are based on good design principles which include understanding and appreciating the positive elements of the existing character and townscape features of the area. This includes existing heritage assets, their setting and the wide historic environment. For example some of the listed descriptions make specific reference to key historic streetscape features (i.e. 1, 1A, 3-11 and attached railings, Portland Street - grade II). English Heritage has published a variety of guidance and best practice which should be considered as part of this process, such as Streets for All. This sets out a series of principles of good practice that should inform improvements in street safety and enhancement of the public realm.</p> <p>7. Table 5: Sustainable Development Objective We welcome the identification of objectives for Quality in Design and Conservation of Historic</p>	<p>Enhanced social and economic opportunities has been modified to reflect the compatibility of this objective with that of Conservation of the Historic Environment</p>

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				<p>Environment under a single list of sustainable development objectives. However we would suggest that the conservation objective should be expanded to include the issue of 'setting' for heritage assets.</p> <p>8. In addition the criteria questions need to recognise the various types of heritage assets, such as conservation areas, listed buildings and archaeology and whether future change will have an impact upon them and their setting.</p> <p>9. Table 6: Summary of sustainability score of place-making objectives  We would suggest that conservation of the historic environment is compatible with the 4th priority of Community: Enhanced social and economic opportunities. It has been demonstrated through past and existing examples, that conservation-led regeneration can provide both economic and social benefits to a local community. We believe that the same could be achieved for this AAP, by using the existing historic environment as a platform in which to develop a sustainable community with a local identity.</p>		

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17	78	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p><b>SWOT Analysis</b> It is noted that the presence of the existing historic environment has not been identified as a strength and future opportunity. The range and prevalence of heritage assets, both listed buildings and conservation areas within the area defined by the AAP, provides a sound basis in which to inform future change and enhance a sense of place.</p> <p><b>Place-making objectives</b> It is with disappointment that none of the four objectives identified do not make reference explicitly to the value of the existing historic environment, in particular the numerous listed buildings and conservation area designations that characterise the area. It is noted that the Aylesbury Estate is the heart of future change but as illustrated in the conceptual diagram on page 19 and explored further in the document, 'moderate change' is expected to take place beyond the immediate defined boundaries of the Estate. For example the Octavia (Liverpool Grove) Conservation Area adjoins the Estate on its western flanks, whilst a terrace of early 20th century houses on Portland Street abuts the Estates boundary. There are many other heritage assets which may not necessarily abut the Estate but would fall within the AAP Area and Wider Area.</p> <p>Reference is made to the production of a Baseline Report that covered urban design, heritage and conservation, but at present there is very little reference appears to have been made to the heritage aspects of this Report within this AAP. As a starting point we would expect to see a map identifying all heritage assets found within and immediate beyond the AAP area. Identifying, appreciating and understanding the areas heritage assets and the wider historic environment should be an essential component of a contextual study</p>	<p>Noted. Although not identified in the SWOT analysis a detailed understanding of the historic environment in the area has been formulated as part of the baseline work.</p> <p>While the four objectives do not make a direct reference to the existing historic environment they are based on good urban design principles. This will ensure that development proposals are sensitive to the historic environment.</p> <p>Street Layout Options 1 and 2 seek to bring back the traditional connections back into the area.</p>

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of the area. This does not appear to be evident in this current version of the AAP.

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17	79	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9		Better Homes: A High Quality Residential Neighbourhood We would ensure that the setting of heritage assets adjoining the Estate are carefully considered as part of the design process of any new builds, in terms of their future scale, form, location, orientation, materials and detailing.	Noted. The setting of heritage assets has been and will continue to be carefully considered as part of the design process. The building heights strategy will consider visual impact of the proposals from sensitive historic locations such as conservation areas. In relation to the scale of the buildings the Issues and Options report is sensitive to locations close to conservation areas by proposing options relating to lower heights adjoining conservation areas (section 2.5.23) and lower densities in areas around conservation areas (section 2.5.20). This approach will be taken forward in the Preferred Options report.  The street layout options in the Issues and Options report seek to bring back traditional connections back into the area.  The Issues and Options report also recognises the need to reduce the size of blocks (urban grain). The development will also have narrow plot widths which are more in keeping with the historic environment.

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17	80	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>Public Life: Better and Safer Streets, Squares and Parks. The Issues</p> <p>Scale and Height of Development We are concerned that a 'benchmark height' of 4 to 5 storeys is identified across the whole of the AAP. How was this figure achieved? As you will be aware there are a number of conservation areas and listed buildings within the AAP area which would be sensitive to the introduction of buildings of an inappropriate scale. The identification of a benchmark height implies that this is the desired height across the whole area, without considering the immediate context. In heritage terms this includes careful consideration of the setting of conservation areas and listed buildings as well as the wider historic environment.</p> <p>It is noted in para 2.4.22 that 'landmark buildings will be located at important places within the Aylesbury area, where they can be clearly seen'. There is a concern that landmark buildings will be automatically equated to tall buildings. The definition provided in FB11 (page 61) implies buildings greater than the benchmark height i.e. 6 storeys or more. What and where are the important places?</p> <p>There are also concerns with regards to some of the statements made in relation to the suitability of tall buildings. Para 2.4.24 for example states that tall buildings can improve the character of an area, act as a landmark, signal the regeneration and demonstrate that money has been spent in an area. What evidence is there to support this, as opposed to areas where no tall buildings have been constructed yet the area has benefited from positive regeneration. In addition does wealth generation really equate to tall buildings? We</p>	<p>Noted. Maps before the 1960's have been considered in the Baseline Report.</p> <p>A buildings heights strategy has been produced which sets out how the range of proposed heights have been arrived at. The building heights strategy includes a visual assessment of the proposal from conservation areas. This work shows that the visual impact of the proposals on conservation areas would be positive. Benchmark heights will differ from one part of the Aylesbury area to another, taking into account the character of adjoining area.</p> <p>Landmark buildings will be of three types district, local and special buildings. District and local landmarks will be taller buildings whereas special buildings will be landmarks because of their distinctive architectural qualities rather than height. Potential locations of these landmark buildings will be shown in the Preferred Options report.</p> <p>The evidence base in developing the building heights is set out in the building heights strategy.</p>



strongly suggest that the guidance set out in the CABE/English Heritage document Tall Buildings 2007 is carefully referred to in the body of this document. A key message we would suggest be emphasised is the need to understand the sites context. This includes appreciating and measuring the effect of tall buildings upon the historic context, in particular upon the setting of heritage assets.

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- 81
- IO 2.7
  - IO 2.8
  - IO 2.9
  - IO 3.1
  - IO 3.2
  - IO Glossary
  - IO Indices

Transport

We would seek to ensure that the principles of good practice as set out in English Heritages Streets for All are considered and applied.

Noted.

Tram

All of the tram options will have effect upon the setting of various heritage assets. Option 2 and 3 are more direct in their impact with the tram passing by a variety of listed buildings within Burgess Park i.e. Former Church of St George (grade II), Groundwork Trust and attached chimney (grade II) and Chumleigh Gardens (grade II). To the north all three options are likely to affect the setting of the English Martyrs School and Primary (both grade II).

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17	148	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>The Building Blocks</p> <p>It is interesting that examples from the USA and Spain are used to illustrate block form and urban grain. Are there no figure grounds based upon existing London urban forms that could be used to illustrate these aspects of our built environment?</p> <p>In addition maps before the 1960's demonstrate the block pattern and urban grain of the area prior to the construction of the Estate. These should be illustrated in the document as they are a useful resource and should be used to help inform future urban forms.</p>	Noted. Maps before the 1960's have been considered in the Baseline Report.

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17	149	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>The Options</p> <p>Street Layout and Urban Grain</p> <p>We reiterate are previous observation, that historical maps should be carefully considered and utilised where appropriate in the reconfiguration of the existing urban pattern. In addition consideration needs to be given to the existing historic environment, in particular the impact heritage assets will have upon determining future street layouts, urban block forms and level of urban grain.</p> <p>Density</p> <p>Considering the density of new homes within the APP needs to be carefully considered in relation to its impact upon existing heritage assets, their setting and the wider historic environment. Higher density appears to correlate to buildings of greater scale/height. So we would wish to ensure that the two matters are carefully linked and considered within a framework of understanding the existing context of the site and its surroundings.</p>	<p>Noted. The masterplan uses the existing street pattern which is largely Victorian. As part of the preferred options, the council has prepared a building heights strategy to outline the rationale behind the options being taken forward. This also considers impacts of tall buildings on the setting of conservation areas and listed buildings.</p>

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17	152	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p><b>Building Heights</b></p> <p>From the options proposed little regard is given to the impact tall buildings will have upon the setting of the neighbouring heritage assets, principally Octavia Hill (Liverpool Grove), Addington Square and Trafalgar Avenue Conservation Areas. In addition there are a number of listed buildings within the vicinity that would be affected, in terms of their settings, by the possible inappropriate placement of tall buildings. This includes listed buildings within the main body of the urban fabric, such as the Church of St Peter (grade I) and within Burgess Park, such as Cumleigh Gardens (grade II).</p> <p>It is noted that many of the comments made relate to the desire to create a district landmark to help uplift values and provide an identity for the area. We are concerned that insufficient consideration has been given to the value of the Walworth Road town centre as a focus for the immediate district. Is there not a danger that the creation of a new landmark/focus for the urban environment will undermine the function, diversity and viability of the existing established town centre?</p> <p>The placement of the tall buildings within the new estate also appears arbitrary. What is the rationale for their location within the wider urban context? At present this is not clearly set out.</p>	<p>Noted. As part of the preferred options, the council has prepared a building heights strategy to outline the rationale behind the options being taken forward. This also considers impacts of tall buildings on the setting of conservation areas and listed buildings.</p> <p>The new neighbourhood will be residential led and should not compete with Walworth Road.</p>

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17	153	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		Burgess Park Options for Burgess Park need to carefully consider the impact change would have upon the various conservation areas and listed buildings within the Park and their setting. None of the implications appear to consider SDO12 conserve and enhance the historic environment and cultural assets.	Noted.
17	154	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		Surrey Square Again heritage assets and their setting within the immediate area appear not to have been considered. 20-54 Surrey Square are listed grade II and relate closely to the proposed enhancement of this area.	Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.
19	19	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
19	82	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	Surrey Square seems to be the only place outside the Aylesbury Estate intended for new building. I agree that the Estate need rebuilding, but if you are going to improve the Estate only at the expense of others you need to make this clear and consult those people properly. Your phasing option on pg154-9 also raise this option, but you provide no opportunity to comment on those options, and the maps do not reflect the proposal to build on Surrey Square.	Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.
20	4	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			
20	20	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
20	31	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Tenure Mix Opt 3	because this meets the housing need of the existing population, it contributes to the development of the mixed community we have said we want to see, and it generates maximum receipts to pay for other necessary facilities. It is further proposed that the take-up of "intermediate" housing is monitored and if this proves particularly attractive then more units could be planned for in later phases	Noted.
20	32	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	New Homes Opt 1	demolish the whole of the estate because of the physical structure of the buildings, the associated management and maintenance issues associated with the concrete blocks, the impact on the urban design of the new area, and associated density issues	Noted. The decision to demolish the buildings is based on detailed Structural Robustness Report and the Demolition Report (Alan Conisbee and Associates March 2005). The findings of these reports is presented in the Building Retention and Demolition strategy which also considers urban design, sustainability and delivery considerations of retaining buildings. [Decision to be made]

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
20	33	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Housing and Open Spa	create the balance as described above as this will ensure that private open space (including gardens) is provided for properties where that is appropriate but that the ability to access open space for those that are in above ground level flats etc is maintained. It is also considered to facilitate a better balance of building types	Noted.The preferred options report will take forward the approach to provide a balance of private, communal and public open space. This approach is based on the Housing and Open Space Option 2 in the Issues and Options report.
20	34	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Distribution Opt 2	higher concentrations as described above because this will result in a more varied overall environment, will enable lower rise housing adjacent the conservation area and similar places, and maximise receipts on high value sites	Noted.



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20	35	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Building Heights Opt 4	tall buildings in important and high value places because this will permit a greater range of heights (including houses) than would otherwise be the case, will result in a more varied environment, and maximise receipts on high value sites	Noted.

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20	36	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>Burgess Park - Option 2-5+ this is suggesting implementing a package of improvements in the Park to make it more attractive but with different interventions (health, environmental, diversity, etc) in different places.</p> <p>There are a number of further proposals:</p> <ul style="list-style-type: none"> <li>that the precise boundary of the Metropolitan Open Land (a planning designation) is changed to remove the former William IV public house from the MOL in order to achieve greater improvements to that building and its aspect onto Burgess Park itself and the proposed "green finger" over Albany Road</li> <li>to consider whether the Chumleigh Gardens area or any other sites be removed from the MOL where it can be demonstrated this will actually benefit the Park</li> <li>that consideration be given to proposed amendments to Albany Road (the so-called "Bartlett Boulevard") which has the potential to enable residential development up to the edge of the Park. What is meant by "Bartlett Boulevard" is the suggestion that Albany Road is closed to traffic from Walworth/Camberwell Road to Wells Way at least, possibly to Thurlow Street, and maybe as far as the Old Kent Road. The traffic would need to be re-routed (around the Elephant and Castle and other routes suggested by the transport planners) but this proposal would have the dual benefit of improving connections between the Park and the residential areas to the north as well as enabling housing and other facilities to be built right up to the edge of the Park as has been successfully done in a number of the Parks visited over the summer</li> </ul>	<p>Noted. Information on the specific facilities and the types of environmental initiatives to be put in place in the AAP area will be further developed in the Preferred Options Report.</p> <p>Metropolitan Open Land (MOL) provide attractive breaks in built up areas and contain particular leisure uses that the Council wish to protect and enhance. At this time no changes to the MOL boundaries in the AAP area have been planned. MOL designation would not prevent re-use of building, it is not unusual to find buildings in MOL, no special circumstances to justify removal</p> <p>The transport strategy will put forward a design solution for Albany Road that will lessen the impacts of vehicular movement, create attractive pedestrian links across it, and integrate it well with the development/residential areas. As part of this, the transport modelling work will also investigate potential and impact of a variety of network changes. It is at this stage unlikely, though, that proposals of closure of Albany Road will be put forward, since it would shift traffic onto streets less suitable to accommodate this level of traffic or onto junctions that are already operating over capacity.</p>

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20	37	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	to improve the gardens and redevelop part of it as described above for the reasons described above	Noted. Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.
20	38	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Tram Opt 1	this is the route that goes straight through the Park as it is believed this provides an added attraction within the Park and has the potential to see Wells Way closed. However, if it were possible to progress the "Beaconsfield Road option", this, combined with "Bartlett Boulevard", has the potential to create a high density scheme adjacent to the Park with the Tram going along its western and northern boundary	Noted.

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20	39	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Car Parking Opt 1	provide the appropriate level of car parking for the residents that already live here. It is further proposed that car-free housing is promoted wherever possible in the private housing to try to keep the overall level of car usage and parking provision down	Noted.
20	40	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		that a business support agency with associated business incubator space be developed; that local employment and local procurement policies be developed and implemented; that sport and leisure facilities be enhanced and developed in the Park AND ALSO on the footprint of the existing estate; that health facilities are improved and standards raised; that education provision is made for all age groups from early years to adult learners; and that local arts and cultural facilities be provided	Noted.

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20	41	<ul style="list-style-type: none"> <li>  IO 2.7</li> <li>  IO 2.8</li> <li>  IO 2.9</li> <li>  IO 3.1</li> <li>  IO 3.2</li> <li>  IO Glossary</li> <li>  IO Indices</li> </ul>	Proposed New Opt (ple	<p>Local shopping - Option 3  this is neither of the options presented but an amendment to Option 2 - that is concentrate new retail development in existing centres but concentrate them in the Thurlow Street/Community Resource Centre area and the East Street junction because they will co-exist more effectively with the other facilities that are planned for these locations and will contribute to overall viability</p>	<p>Noted. The Preferred Options will include nodes including local shops at the junction of Thurlow Street with Westmoreland Road and East Street and on the site of Amersham Hall.</p>

<i>Objector Ref</i>	<i>representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
20	42	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		<p>Phasing - Option 2 the 15 year programme with the Thurlow Street area to form the second main phase as this will help to create this area as a "destination" and will generate maximum value from the Burgess Park frontage once values have risen</p> <p>Neighbourhood management - Option a that a Neighbourhood management model (ie, local people having an influence over the development and delivery of local services) is developed and agreed as part of the redevelopment strategy</p> <p>Delivery - Option a that the Creation Trust is considered a central and essential partner in the delivery process in order to build upon the role that has been undertaken by resident representatives in getting the scheme to where it is now and the access to resources that the Trust will have in the future</p> <p>In order to develop thinking in all of these areas and ensure that residents aspirations as expressed through these recommendations (as amended if appropriate) are fully realised in the "preferred option" to be developed over the coming weeks it is proposed that representatives of the residents (the Re-Housing Sub Group, for instance, augmented as considered necessary) meet with Urban Initiatives fortnightly over the next few months.</p> <p>Recommendation The Aylesbury New Deal for Communities Partnership is recommended to:</p> <ol style="list-style-type: none"> <li>1. Note the content of the report</li> <li>2. Comment on the proposed options contained within the report</li> <li>3. Approve the proposed options (as</li> </ol>	Noted.

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<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
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amended if appropriate)

4. Agree that these options be forwarded to LB Southwark as the formal response of the Aylesbury NDC

5. Seek a fortnightly meeting with Urban Initiatives over the coming months to ensure that all of these issues are developed in a way that meets residents aspirations.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
20	83	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>Burgess Park: Aylesbury NDC Board Members raise the following issues: Members request more information on the specific facilities which would be provided in the park.</p> <p>Members are happy to support environmental initiatives but not buildings such as the biomass plant and other large developments associated with energy generation or waste disposal.</p> <p>The precise boundary of the Metropolitan Open Land is changed to remove the former William IV public house from the MOL in order to achieve greater improvements to that building and its aspect onto Burgess Park itself and the proposed "green finger" over Albany Road</p> <p>To consider whether the Chumleigh Gardens area or any other sites be removed from the MOL where it can be demonstrated this will actually benefit the park</p> <p>That consideration be given to proposed amendments to Albany Road which has the potential to enable residential development up to the edge of the park. The suggestion is that Albany Road is closed to traffic from Walworth/Camberwell Road to Wells Way at least, possibly to Thurlow Street and maybe as far as the Old Kent Road. The traffic would need to be re-routed (around the Elephant and Castle and other routes suggested by the transport planners) but this proposal would have the dual benefit of improving connections between the Park and the residential areas to the north as well as enabling housing and other facilities to be built right up to the edge of the Park as has been successfully done in a number of the parks visited over the summer. Additionally, members noted that minor modifications to the park boundary and road alignments at the south side of the park would have the potential to create a west-east road</p>	<p>Noted.</p> <p>Information on the specific facilities and the types of environmental initiatives to be put in place in the AAP area will be further developed in the Preferred Options Report.</p> <p>Metropolitan Open Land (MOL) provide attractive breaks in built up areas and contain particular leisure uses that the Council wish to protect and enhance. At this time no changes to the MOL boundaries in the AAP area have been planned. Can we say why the William IV should not be included... MOL designation would not prevent re-use of building, it is not unusual to find buildings in MOL, no special circumstances to justify removal</p> <p>The transport strategy will put forward a design solution for Albany Road that will lessen the impacts of vehicular movement, create attractive pedestrian links across it, and integrate it well with the development/residential areas. As part of this, the transport modelling work will also investigate potential and impact of a variety of network changes. It is at this stage unlikely, though, that proposals of closure of Albany Road will be put forward, since it would shift traffic onto streets less suitable to accommodate this level of traffic or onto junctions that are already operating over capacity.</p>



<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
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crossing south of the park. Members supported this proposal.

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84 | IO 2.7  
 | IO 2.8  
 | IO 2.9  
 | IO 3.1  
 | IO 3.2  
 | IO Glossary  
 | IO Indices

Tram:  
 Aylesbury NDC Board Members would like it noted they support only the tram having a direct route across Burgess Park NOT other traffic.

Noted.

20

85 | IO 2.7  
 | IO 2.8  
 | IO 2.9  
 | IO 3.1  
 | IO 3.2  
 | IO Glossary  
 | IO Indices

Sports and Leisure:  
 Members request that a suitable non-residential site is identified for the provision of a multi-function community facility.

Noted.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
20	86	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		<p>Additional comments:</p> <p>Neighbourhood Management            A Neighbourhood Management Model (ie local people having an influence over the development and delivery of local services) should be developed and agreed as part of the redevelopment strategy.</p> <p>Delivery mechanism            That the Creation Trust is considered a central and essential partner in the delivery process in order to build upon the role that has been undertaken by resident representatives in getting the scheme to where it is now and the access to resources that the Trust will have in the future.</p>	The local community have been actively involved throughout the AAP process and will continue to be consulted on the development and delivery of local services.
20	111	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		<p>Phasing preferred option:            Phasing Option 2: 15 Year Programme:            Thurlow Focus</p>	Noted.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
21	21	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			
21	87	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	New Homes Opt 2	<p>Better Homes: But go for maximum refurbishment - by far the most sustainable option.</p> <p>Refurbish blocks than can be kept - concentrate on remodelling external spaces and access. Many of the green spaces on the Aylesbury are attractive and tenants do not feel the same antagonism towards their homes and estate that design professionals appear to. It's ugly - but some of them love it. The interior space standards are generous and people do not want to give them up.</p> <p>Stop Channel 4 using the estate as an advert, festooned with rubbish.</p>	<p>Noted. The decision to demolish the buildings is based on detailed Structural Robustness Report and the Demolition Report (Alan Conisbee and Associates March 2005). The findings of these reports is presented in the Building Retention and Demolition strategy which also considers urban design, sustainability and delivery considerations of retaining buildings. [Decision to be made]</p>

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
21	88	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>Public Life: Although I agree that in general this is the better option fo all sorts of urban layouts - in this instance I think that we should respect th esprit of the ballot of 2002 and especially the tenants' wish NOT to demolish the entire estate. What price democracy? What right do design professionals have to override a clearly expressed and highly regulated ballot?</p> <p>Do NOT build anything on Surrey Square Gardens. Improve it - we had a project to do so - what was the point of people getting involved if all their efforts are trashed? Why is every small green space in this area swallowed up for 'regeneration'?</p> <p>There are so many arguments for Option 1 -</p> <ul style="list-style-type: none"> <li>- it prioritises the needs ot the regeneration over the needs of the tenants and residents in the Kinglake Estate, the Alvey Estate and Surrey Square</li> <li>- it will significantly reduce the openness of the green space</li> <li>- it cuts down the opportunities for local play - in fact makes the local environment 'obesogenic' rather thna 'healthy' for local residents</li> <li>- the Square is well used at particular times of day and times of year - a 'traditional garden square' cannot accommodate all the uses</li> </ul>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p>

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
21	89	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		<p>Connections: We should solve the problems of streets by re-allocating road space and supporting walking and cycling - as is being done with the excellent Walworht Road project.</p> <p>Yes - more intensively used safe streets - less proposals for pedestrianisation - which we have already and does not work...</p>	Noted.
21	90	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		<p>Health Provision: This is mad - the Aylesbury Estate is part of a wider area - the Heygate - whose density is being doubled is only a few 100m away - the area has to be seen in its wider context..of course local health needs should be provided for - but assessed as part of East Walworth. Also waht about the whole AAP area - why should everything be concentrated on the 'the Estate'?</p> <p>Raising the minimum wage (beyond the remit of the AAP...)</p>	Health care provision has been considered with regard to the aspirations of the Primary Care Trust for a "hub and spoke" model with a hub or main/central facility delivered at Elephant and Castle, linked to a spoke or smaller local facility in the Aylesbury area. New healthcare and medical facilities will be integrated with social care services and co-located with other community facilities such as schools, libraries and employment and business support. This option will ensure that all residents within the Aylesbury area have good access to high quality health facilities. Health care facilities will be located in the most suitable area, to allow the easiest access for the greatest number of people.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
21	150	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Biodiversity Opt 2	<p>Do NOT build anything on Surrey Square Gardens. Improve it - we had a project to do so - what was the point of people getting involved if all their efforts are trashed? Why is every small green space in this area swallowed up for 'regeneration'?</p> <p>There are so many arguments for Option 1 -</p> <ul style="list-style-type: none"> <li>- it prioritises the needs of the regeneration over the needs of the tenants and residents in the Kinglake Estate, the Alvey Estate and Surrey Square</li> <li>- it will significantly reduce the openness of the green space</li> <li>- it cuts down the opportunities for local play - in fact makes the local environment 'obesogenic' rather than 'healthy' for local residents</li> <li>- the Square is well used at particular times of day and times of year - a 'traditional garden square' cannot accommodate all the uses</li> </ul>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p>

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
21	151	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Shopping Opt 1	<p>Shopping:</p> <p>A whole new shopping centre is being built at the Elephant and the Walworth Road project will also support local shopping. East Street market and East Street itself should also be improved and enhanced - surely the area should be considered as a whole taking on board these ongoing projects and resources? Perhaps there should be more shopping opportunities along Albany Road and/or Thurlow street - they are both regionally and locally connected. East Street market is not just a 'local' market - it acutally has a regional catchment and suffers from being too overcrowded. Again the whole AAP area should be considered in its wider context and not just 'the Estate'.</p>	<p>Option 1 will be developed in the Preferred Options report. This Option will include improvements to the quality of the shopping experience and facilities on East Street.</p> <p>The AAP proposes local shops on nodes along Thurlow Street</p>
21	156	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Tenure Mix Opt 1	<p>All social housing tenancies to be kept with the council - not transferred to an RSL.</p>	<p>The comment is noted. However the council is unable to finance the building of new council housing.</p>

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
22	22	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			
22	91	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Size of Homes Opt 1	Better Homes: I think it is important to consider that the general trend for family units is now that of the single parent family. Also more people prefer to live on their own and existing nuclear families tend to break-up. Much more emphasis should be put on the provision of one bedroom apartments.	Noted. The Size of Homes Option is based on borough-wide housing needs and our best current estimate of the housing of existing social rented tenants on the Aylesbury Estate. This approach will be carried forward in the preferred options report.
22	92	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Health Provision Opt 1	Health Provision: The present services are already stretched. The increase in the number of residents will stretch them further.	The provision of healthcare services in the Preferred Options report will reflect the increased levels of local population and service need.



<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
23	23	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			
23	93	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9		<p>Better Homes: Refurbish the area.</p> <p>More workshops. More space for young people to develop and grow.</p> <p>Plant big trees all over the shop.</p> <p>Don't demolish anything.</p> <p>Surely those buildings are of historic value, just as much as London brick Georgian houses. Have you told English Heritage? Do they know what's going on?</p> <p>Re-organise the council and Transport For London.</p>	<p>Noted. Museum of London Archaeology Service (MOLA) have undertaken an archaeological desk based assessment in 2006. This recognised the existing Aylesbury buildings of some value in terms of recent social history. However, the buildings are not considered worthy of retention based on their historic value. The buildings are not on the national or local list of historic buildings. English Heritage have been consulted at this stage and have not raised any concerns regarding demolishing the estate. A factual historic record of the buildings in the form of photographic survey has been undertaken.</p> <p>The costs of refurbishment for the estate were considered excessive and this was one of the reasons why the council took the decision in 2005 to redevelop the estate.</p>

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
23	94	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		<p>Public Life: Put in proper cycle paths off the road. Lift trams off the ground and put in a mono-rail. Free-up the roads.</p> <p>More lights in the park and few telephones like on motorway straight to the police. Get some big heavy horses in.</p> <p>Surrey Square: Wrote "NO" next to both options.</p> <p>Create small farms. More sculptures. German war planes. A real steam locomotive by the bridge. A few more tanks here and there.</p> <p>Build some youth clubs.</p> <p>Get the police in to schools, teach them how to ride bikes, how to drive if they stay on at school. Teach them how to row, how to sail, canoeing. Put back the canals, climbing walls. Start some rare-breed herds. Plant big trees.</p>	<p>Noted.</p> <p>Improvements to Burgess Park will included initiatives to reduce crime and fear of crime.</p> <p>Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p> <p>Arts and Culture Option 2 includes a proposal for a sculpture park within Burgess Park.</p>

<i>Objector Ref</i>	<i>representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
23	95	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		<p>Transport: Wrote "Off the ground" by public transport option 3.</p> <p>Give the poorer people a chance to use the roads. As well, stop penalising them, robbing off them, treating them like shite.</p>	Noted.
23	96	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices		<p>Give the local people more chance to be involved, employ more of them. Start up some local council run building firms. Give them a chance to earn some money for once instead of sending it all off elsewhere. Start a big building college for Southwark School leavers. Apprenticeships.</p> <p>Economic Opportunities: Wrote by Shopping Option 1: "Workshops... small local businesses"</p> <p>Stop bringing in the rich, stop building gated communities. Clear out the career councillors. Stop treating us all like criminals. Stop killing the life and soul of Southwark. Stop ripping off poor people taking their belongings. Stop this war against the motor car. Get rid of the Mayor(Ken) - get someone else to have a go.</p>	<p>Noted.</p> <p>The AAP aims to create a mixed community with a mix of tenures, incomes, ages and household types and will not create "gated communities".</p>

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
23	157	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>This isn't "consultation". This is a mess. It isn't about better neighbourhoods. Southwark Council don't give a monkeys. This is a class thing, a buy-to-let thing. It's about pushing out poor people, and building gated communities, like in Spain and India. It's about making our lives hell. So we have no alternative but to leave. Southwark Council has nothing but contempt for its tenants. You must think we're blind. This is political dishonesty. Why haven't the planners rejuvenated the Aylesbury, instead of starting to demolish? I've seen what a mess they can make in Peckham, in Borough. Building Factory units fully of studio flats. Leave it out. Why don't you house your tenants in the Empire at Boro, better still make them live in tents in Potters Field. Better still, sack everyone and start again. You have not got a clue.</p>	<p>Noted. While letters were sent out to the tenants and residents associations, the council acknowledges that residents around Surrey Square could have been better involved in the consultation process. Two meetings have taken place with residents and representatives from the T&amp;RAs around Surrey Square and the council will endeavour to ensure that residents around Surrey Square are included in all future consultation about the area action plan</p> <p>The AAP aims to create a mixed community with a mix of tenures, incomes, ages and household types and will not create "gated communities". Studio flats will make up only a small proportion of the development (see Size of Homes in the Preferred Options report).</p>
24	24	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			

<i><b>Objector Ref</b></i>	<i><b>resentation Ref</b></i>	<i><b>Section</b></i>	<i><b>Option</b></i>	<i><b>Details of Representation</b></i>	<i><b>Officer Response to Representation</b></i>
24	97	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Size of Homes Opt 1	Better Homes: Higher % of 3 bedroom properties.	The preferred option will ensure that 25% of new homes will have 3 or more bedrooms and 48% will have 2 bedrooms. The Size of Homes Option is based on borough-wide housing needs and our best current estimate of the housing of existing social rented tenants on the Aylesbury Estate.
24	98	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 1	Surrey Square: In consultation but lead bt KT&R and Surrey Square RA	Noted.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
24	155	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	Surrey Square: Absolutely not	Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.
25	25	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			
25	99	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	Surrey Square: Building in Surrey Square on the park is not an option which any residents in that area favour. It is already a high density population which needs that green space. It is also non-sensical to build on an already green park and create a so called finger to a busy road. Building on Surrey Square should not be an option.	Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
26	100	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	I have lived in Kinglake Street for over twenty years, during that time I have enjoyed walking through Surrey Square Park. I am extremely concern about the option to build over 150 properties taking over half or more of Surrey Square Park which is the only green open space in the whole of Kinglake Estate. I am completely against any building in this space.	Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.
27	101	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4			

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
27	102	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2		Are there proposals to build housing outside the Aylesbury area?	Some early housing sites will be required outside the footprint of the estate. A number of sites have been identified and the council is working with RSLs to ensure these are delivered.  There is no plan currently to remove the barrier at the end of Kinglake Street.



<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
27	103	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	<p>Surrey Square is a small highly characterful and historic area enjoyed and used by many different communities. But it cannot sustain more housing being built on it: both in terms of its supporting biodiversity and in its unique offering of a small scale space of public rest and recreation. Although it should most certainly be left unbuilt on it has real potential as a more intimate and quiet alternative to the - to some people - alarmingly large spaces of Burgess Park. Also please see Q.5 on P.9 as Surrey Square has potential to be an area of this sort given appropriate funding.</p> <p>On a separate but related issue, the barrier at Surrey Square's Old Kent Road end should also be left in place safeguarding the street from regressing to being the dangerous and noise ridden 'rat run' it had degenerated into in the eighties and early nineties.</p>	Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.
27	104	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Arts and Culture Opt 2	Ongoing support for current Arts activities in the area should be guaranteed.	Noted.

<i>Objector Ref</i>	<i>representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
28	105	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	<p>I write to comment on the proposal to use Surrey Square Park for the building of residential units for the Aylesbury Estate. I write as a local resident, chairman of Governors at Surrey Square Infant School, and Vicar of the Anglican Parish of St Christopher, Walworth, in which Surrey Square Park is situated.</p> <p>I have read the submission made to you by Mr John Trew as chair of the Surrey Square T&amp;RA, and wish to add my support to Mr Trew's submission, and endorse what he has said.</p> <p>Clearly there is a need to build new units in order for the Aylesbury decanting process to take place. Many of our school children and many of my parishioners live on the Aylesbury, and I would wish for them to have the best possible accommodation in the future.</p> <p>It seems to me that the proposal to use Surrey Square Park is based on the assumption that the Park is underused. This could not be further from the truth. In collaboration with Groundwork, SSPACE spent a good deal of time and effort, raising money and improving the park over recent years. This resulted in the new play facilities and memorial garden, as well as the improvement of the grassed area. However, since responsibility for the upkeep of the park has been handed back to Southwark Council, the Council seem to have done nothing to maintain it, save mowing the grass in the summer. Consequently the park is</p>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p>

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littered with dog faeces, bottles and cans, and has a real 'uncared for' feel.

That said the Park is still well-used, and would be used more if it were in better condition. You may not know that Surrey Square Infant and Junior Schools do not have any playing fields. The Park provides space for class games, school sports and environmental projects. The amenity of the Park is key in the School delivering on the Every Child Matters Agenda, promoting healthy lifestyles, and physical activity - an area which was rated as Excellent in the Infant School's recent OFSTED inspection. Being able to use the Park also helps us deliver on Southwark PCT's obesity strategy, and it is well known that there are enormous concerns about obesity in children.

The Park is also an important amenity for those who live on the Kinglake and Aylesbury Estates around. Parents and children sit in the park when the weather is fine, and it is a great family gathering point. Also our Youth Centre (Pembroke House Youth Centre) regularly use the Park for football training. It has been said that Burgess Park is close enough not need the green space in Surrey Square, but that comment fails to understand the safety concerns that parents have for their children in our increasingly violent society. We live with the blight of gang culture, which effects so many of our young people, and they are afraid to move off their estates and neighbourhoods,

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into what is perceived as other people's territory. We should be improving our open spaces not removing them. The crying need for communal open spaces will be even more critical when the population of the new Aylesbury estate is almost doubled.

I look forward to continuing this discussion after the Christmas break, but wanted to register my opposition to the proposed scheme to build on Surrey Square Park.

Alternative sites? What about the Council's car pound on Mandela Way? It is an enormous space within a stone's throw of Surrey Square, and close enough to the existing Aylesbury Estate that residents wouldn't be severely uprooted from their communities, and would be near schools, friends and support networks.

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29	106	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	<p>I am writing to you register my opposition to the proposal outlined in Option 2 of the Aylesbury Area Action Plan (AAP) - Issues and Options report.</p> <p>The loss of at least 50% of the area of Surrey Square park would have a detrimental effect upon the life of the neighbourhood and upon me personally and my peace of mind.</p> <p>I use Surrey Square park to jog in; relax in the summer time; to walk in. I value the space. I have been involved in Kinglake Tenants and Resident's Association - during the summer I spent a lot of time working with Groundwork Southwark to arrange a creative week on Surrey Square park. We are in the process of raising funds to improve the play area in the North-East corner.</p> <p>Surrey Square park creates space amongst the flats and busy roads of the area. The wild area in the North - East area is home to shrubs, plants, insects. Surrey Square park is home to a colony of bats. It is used by local people to walk dogs, play, picnic, breath. I have seen nothing in the AAP that would come anywhere near adequately replacing Surrey Square park. The Green fingers are rather nebulous.</p> <p>I was very dissapointed by the complete lack of consultation and involvement provided for people in the Kinglake estate and others who live around the area. I can assure you that had the local resident's learned earlier of Option 2 we would have been organising and voicing our opposition much earlier. As it is we have had to rush around madly researching, organising, reading documents, consulting, emailing, organising meetings etc. etc. This has caused me extra stress in my life.</p> <p>I would appreciate your explanation of what went wrong with the consultation process and acknowledgement of receipt of my feedback.</p>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p>

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*Objector Ref*      *Representation Ref*    *Section*                      *Option*                      *Details of Representation*                      *Officer Response to Representation*

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30	107	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	<p>I am writing to not only object to the building of flats on Surrey Square Park, but to seek the withdrawal of Option 2 on the basis that this Option is misrepresented in the proposals and extremely biased in favour of development. I set out below my analysis of this issue.</p> <p>1. Background</p> <p>1.1 The consultation in relation to the Surrey Square Park with the local residents and community organisations has not met the criteria set out in the Council's statements of community involvement by the Council and GLA. The documentation has been misleading and does not explain the development options correctly. (see detailed comments Ch.2).</p> <p>1.2 The document (page 92) on Surrey Square : Option 2 is biased towards development of the park and has not undertaken a development appraisal sufficient to guarantee the increase of 150 homes able to bring forward the redevelopment of the Aylesbury by three years (see detailed comments Ch.3).</p> <p>1.3 The documents make no reference to the policies set out in the current UDP which protect Borough Owned Land (BOL) or the guarantee of the replacement of the lost open space / play areas locally (see detailed comments Ch.4).</p> <p>2. Consultation</p> <p>2.1 The Council through the consultation process for the Local Development Framework and Local Area Actions Plans should have met the criteria set out in the Council's "Statement of Community Involvement". The Council has failed to do</p>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p>

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this. Although the large amount of consultation has taken place in relation to the Aylesbury Regeneration area when the AAP was extended eastward to cover Surrey Square and the Park, the consultation process was not undertaken at an appropriate level, comparable to the work on the Aylesbury Estate. It was not until the original date for representation had past, that the Masterplanners were able to attend a public meeting with the residents of the Surrey Square Area.

2.2 The GLA under the London Plan has also made it a requirement for local people to be fully consulted in the Draft Policies. I believe the Council's failure to meet their own criteria has also meant they have failed to meet the GLA criteria.

2.3 The failure has been accepted by Southwark Council officers and should be taken into account in the review of the Issues and Options proposals.

2.4 This failure taken into account with the misrepresentations and bias towards Option 2, could lead to decisions being challenged should the proposal to redevelop the Park be taken forward.

2.5 The documentation is misleading and is biased in Option 2 towards development.

The paper states :

2.5.54 "This option will create a direct route between the Square and the green finger to Burgess Park". The route proposed is an existing road, Bagshot Street, which is already a route to Burgess Park and has planted areas on the west side of the street for the majority of its length. The only improvement on the



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plans appears to be the demolition of two blocks on the Kinglake Estate, Tenterton House and Fareham House, with the loss of 50 rented homes. This increases the need for decanting the rented homes in the area, and needs to be deducted from the new homes for rent proposed to be built on Surrey Square Park. (see attached plans for document and UDP).

Also the paragraph goes on to state "as well as improved internal layout and habitat provision." The reduction in the park cannot be considered to be offset by such a bland statement, without providing a detailed appraisal of the disadvantages and benefits of the proposals, which is not available. The paragraph goes on to state "This option will involve building housing on the southern side of Surrey Square, which would provide early rehousing for the redevelopment". This statement is unclear and misleading as the proposals also include building on the Kinglake Estate play / amenity areas, and demolition of two blocks on the Kinglake Estate, which is not set out in the text. This paragraph does not clarify which area / estate will benefit by the provision of early rehousing for the redevelopment? Also the term "early rehousing" appears to have no detailed background work to justify the statement?

There is an acceptance that under the current UDP the proposal would be rejected and that it would be only as part of the LDF, with a guarantee of any lost open space being replaced locally, that the proposal could go forward. The Council Planning Department consider the LDF will take at least two years to secure Government Agreement to the Core Strategy, and that it might even take longer. Then the detailed planning process would have to take place with potential further

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objections and potential GLA or GOL call ins, plus a resultant public inquiry which could take up to five years to start on site and two years to complete.

Therefore it is grossly misleading to state that "building housing on the southern side of Surrey Square would provide early rehousing for the redevelopment" which I assume means the Aylesbury Estate regeneration programme?

Implications

2.5.55 The statement "this will improve the form and layout to create a traditional garden square" is grossly misleading, as the reduction of over 50% plus the loss of the play areas and amenity space on the Kinglake Estate, is not able to be offset by a greatly reduced area of land, where the housing to the south is cut off from the proposed traditional garden square.

Also it is misleading to state "it will create a continuous network of green spaces providing a more attractive walking / cycle route, better links to Burgess Park and a wildlife corridor". The route on the plan is an existing road, Bagshot Street, which has green spaces on its western side, which is an existing route to Burgess Park. The main improvement appears to be the demolition of two existing blocks on the Kinglake Estate, which is not only completely unrealistic, but adds to the decanting for the area of rented homes.

Also there is no reference to the demolition of these blocks in the text of Option 2. Again this is a misrepresentation of the proposal. Without the demolition of these blocks there will be no major improvements to green spaces that could not be undertaken in Option

1.

It goes on to state "it will better use some of the space to provide early rehousing sites for the regeneration of the Aylesbury Estate. This has been tested and because it could be available very early on, could significantly reduce the overall length of the redevelopment".

This statement is not only untrue and misleading, but it also has no foundation as it is clear there has not been sufficient detailed work undertaken on the proposals or that the reference to the testing of the proposals has been supported by a detailed analysis of the regeneration proposals for the Aylesbury Estate, either financially or in reviewing all the options either on-site or off-site on the Aylesbury Estate.

The proposal to build 150 homes on the areas shown on the plans is required to be built-on at least five storeys. An initial appraisal of the sunlight and daylight criteria for planning and the Rights of Light for the existing owners (including the Council), see attached diagram, demonstrating that no more than three storeys can be built upon the park, therefore only 100 flats could be built.

The retention of the sports court belonging to Kinglake Estate would lose at least one bay providing five flats. The retention of Tenterton House and its amenity space would lose three bays equal to 15 flats.

Therefore the potential development would be reduced to 80 flats. The current proposal is for 50% of the homes to be affordable with 50% for sale, if that is applied to the mix of housing then only 40 flats for rent would be available for decanting the Aylesbury Estate.

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This would not save three years in the regeneration programme and the loss to the community would be enormous.

However, if the two blocks on the Aylesbury were demolished although 95 flats could be provided plus improvements to the green corridor, there would only be 48 flats for rent, with a loss of 50 flats from the Kinglake Estate, and there would be no rented homes available for the decanting of the Aylesbury Estate, and a further two rented flats would be needed to clear the two Kinglake blocks.

2.5.56 Is also very misleading and impossible to understand. It states "This option will have an impact on the biodiversity of Surrey Square." The language used is unintelligible for most residents. What it should say is that 50% of the area of the Park, the sports courts for Kinglake Estate, the Kinglake block (Tenterton House) and its amenity space, will be lost to build new homes, where half of the homes will be used to decant the Aylesbury Estate. This point is the main reason the consultation process is, I consider, invalid and potentially subject to challenge.

The paragraph also states "However, this impact will be integrated by re-providing habitats in new areas of open space within the action plan area, as well as enhancing existing habitats, such as those within Burgess Park. In addition the design of the new buildings within the area action plan will take into account, where possible, the need to protect and encourage wildlife and natural habitats." This again is very misleading. The green corridors of Bagshot Street and Thurlow Street are existing roads to be retained with better planning. They have very little potential for replacing lost open space and the existing uses. These corridors can also be enhanced

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under Option 1. It is not until the Masterplan proposals west of Thurlow Street are there green corridors, which could have such amenities without vehicle traffic. There is no guarantee that the loss of 50% of Surrey Square Park plus the play / amenity space on Kinglake Estate, can be or will be replaced locally. I would hope that the new buildings and public realm for the regeneration of the Aylesbury would protect and encourage wildlife and natural habitats, but this can also happen under Option 1. Also the existing open space on the Aylesbury Estate should be included to calculate the loss of open space. The loss of the open space to the east of the park should be subject to revised audit of the availability of open space in Southwark. The current audit shows that an acceptable level of open space is available for the area surrounding the park. However, the area directly to the east of Surrey Square over the Old Kent Road is an area lacking in open space. With the removal of the eastward leg of Surrey Square Park to the edge of the park, moves over 100 metres to the west, this is likely to move the deficit of open space across the Old Kent Road to Flinton Street, which includes the eastern side of Kinglake Estate. It is therefore necessary to reaudit the open space in the area, with the reduced park area in relation to the Borough wide audit of open space.

6. Conclusion

6.1 The consultation process and information provided is flawed and misleading and does not give any detail on the scale of the loss of the Park.

6.2 The level of proposed housing to be built is overstated and will have little impact on the decanting programme for the Aylesbury Estate.

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6.3 There is no guarantee that the loss of open space will be replaced locally providing similar uses.

6.4 The demolition of the existing blocks on Kinglake Estate has not been stated in the text, and therefore should not be considered in the Area Action Plan.

6.5 The process has not met the criteria set out in the GLA and Southwark Council's Statement of Community Involvement.

6.6 Option 2 should therefore be abandoned and not considered in the next stage of the Local Development Framework, as it would be subject to legal challenge.

6.7 An enhanced version of Option 1 should be developed to improve the Park and create sustainable management and recycling plan for the Park to be taken forward in parallel with the Aylesbury Estate Regeneration.

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31	113	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>Lack of consultation and involvement: On 15th November 2007, we were contacted by the Kingslake Tenants and Residents Association (KTRA) who advised us that the above-referenced Issues and Options Report (I&amp;O Report) contained proposals that directly affected Surrey Square Park. In particular, we were advised that the I&amp;O Report included an Option (Option 2 on page 92) to build housing on the Southern Side of Surrey Square. Although Mr. Frank Vickery (52 Surrey Square) has been attending meetings of the Aylesbury Neighbourhood Team, he was not made aware of how advanced the proposal had become. We understand that both the Surrey Square Infants and Junior Schools and the KTRA were similarly taken by surprise.</p> <p>Given that Surrey Square Park falls within the boundaries of the Area Action Plan (AAP), we are shocked and very disappointed that we have not hitherto been included in the Consultation process. Option 2 is a radical proposal that would, if implemented, have a profound effect on the Square and we believe that we should have been fully consulted about any proposals that would affect it directly. Indeed, not involving us would appear to be a fundamental breach of the stated Consultation Strategy and the Statement of Community Involvement - as referred to at 1.3.9-14 of the I&amp;O Report.</p> <p>Therefore, whilst being grateful for the extended period in which to respond to the I&amp;O Report, we would ask you please to provide us with a full, written explanation of:</p> <p>a) why the Consultation and Involvement process was not followed in our case; and b) how the Council and its Agents are going to rectify the situation?</p>	<p>Noted. While letters were sent out to the tenants and residents associations, the council acknowledges that residents around Surrey Square could have been better involved in the consultation process. Two meetings have taken place with residents and representatives from the T&amp;RAs around Surrey Square and the council will endeavour to ensure that residents around Surrey Square are included in all future consultation about the area action plan.</p>





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31	114	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 1	<p>Surrey Square Residents' Association is unanimously opposed to the proposal as outlined in Option 2 at 2.5.5.54-56 of the I&amp;O Report.</p> <p>Subject to clarification and further consultation, SSRA supports Option 1.</p> <p>Reasons for supporting Option 1: In the late 1970's, Southwark Council acquired and demolished a number of Victorian Terraced houses that stood within the boundaries of Surrey Square Park. This was done specifically in order to provide amenity space for the Kinglake Estate, the residential areas to the east and south of the park and, to a certain extent, for the line of houses along Surrey Square and that part of the Aylesbury Estate overlooking Surrey Square Park.</p> <p>Since that time, the northern part of Surrey Square Park has been improved considerably, with the creation of a formal park area, a wilderness area and a gated children's playground. Much of this was developed under the auspices of a two-year project sponsored by Groundwork Trust. Many local residents, including myself, were directly involved in that process. There was a lengthy consultation process in order to evaluate precisely what sort of Park the local community wanted. The vision developed at that time has not changed at all.</p> <p>Today, the Square is used by residents with small children (especially in the fenced playground), by the Surrey Square Infants and Junior Schools (for recreation). For children's events, for people having picnics in the summer and for people walking their dogs. The park is a well-used resource that provides a safe haven for smaller children. It is overlooked from many of the parent's homes</p>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p>

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and is a welcome contrast to the wide-open spaces of Burgess Park.

Unfortunately, due entirely to a lack of funding, the plans drawn up with Groundwork trust have not been realised - especially on the southern side of the Square. This is specifically recognised in the I&O Report at 2.4.35. Everyone in the community would therefore welcome further investment in Surrey Sqaure Park in order to fulfil our earlier vision.

2.5.54 states that Option 2 would create a green finger to Burgess Park. However, the plan indicates that the finger will not cross Kinglake Street or connect directly with Surrey Square Park.

The Green Fingers proposed by the planners vary greatly in terms of the quality of environements that would be created - from high quality, car-free, green space to very low-quality local roads with additional planting. The Green Finger along Bagshot Street is low-quality with little more than replanting on an existing green space. Also, the way to Surrey Square Park is through the blocks of flats on the Kingslake Estate. This is possible if the Park is retained but impossible under the scheme proposed because the new housing would effectively block this route!

Subject to further clarification and consultation, however, the SSRA would welcome a green finger linking the Park to Burgess Park. SSRA sees no reason why a suitable green finger option could not be incorporated into Option 1 and questions why it was not included as, say, a third option?

For the reasons outlined above, subject to clarification and further consultation, SSRA

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supports Option 1 of the I&O Report.

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31	115	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	<p>Reasons for Opposing Option 2: The SSRA has a number of reasons for opposing Option 2. These are as follows:</p> <p>A. Option 2 envisages the loss of the entire southern half of the Square plus parts of the Kinglake estate (the small sports court to the east of the park and the fenced amenity space to the western side of the blocks). The immediate community would therefore be deprived of about one half of the amenity. The full vision developed by the Community with Groundwork Trust would therefore be unreliable.</p> <p>B. 2.5.55 states that the remainder of the Square would be "improved" to create a "traditional garden square". A traditional garden square is not defined at all but implies a more formal, structured space that would involve loss of the children's playground, the large sports court and the wilderness area. It is difficult to see how such a scheme would be of material benefit to the residents. It is not what they asked for when consulted by Goundwork Trust.</p> <p>C. 2.5.54 describes the Option as providing an "improved internal layout and habitat rovision." It is difficult to understand this statement. First, the green finger does not impact the "internal" structure of Surrey Square Park at all. Secondly, it is not clear which habitat is being referred to. Habitat is not defined in the Glossary. Is it habitat for people, or animals, or plants, or all of them? It is impossible to understand now the building of houses along the entire southern length of Surrey Square Park would improve the habitat of those currently living in the blocks of flats that currently face onto Surrey Square. An explanation would be appreciated.</p>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p>

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D. A major stated benefit of Option 2 (again at 2.5.54) is that it would provide "early rehousing for the redevelopment" and "it will better use some of the space to provide for early rehousing sites for the regeneration of the Aylesbury Estate" (2.5.55).

First, whilst it is easy to see how this might be of benefit to the planners seeking to rehouse large numbers of residents from the Aylesbury Estate redevelopment, it is difficult, if not impossible, to see how the building of flats on half of the Square benefits those people currently living in its immediate vicinity. Indeed, for the many reasons set out above and below, we see this Option as a considerable disbenefit that degrades the Park.

It is fundamentally inequitable that the residents surrounding Surrey Square Park should have their amenity reduced by 50% and the quality of their environment radically reduced in order to solve a planning problem elsewhere.

Currently, there are 110 flats on Kingslake Estate. Those facing/next to the Park, which rise to between 5 and 6 storeys, occupy a land area of about 150% of the area to be taken by the 150 flats to be built on the Park. Given the shallow depth of the site (and excluding the land within the Kingslake Estate), the proposal to build 150 homes in such a small area appears extremely optimistic given the higher standards required for residential developments in Southwark. How is the issue of car parking for 150 homes to be addressed? This aspect is not mentioned in the report at all.

In our view, the fact that it will almost certainly prove impossible to create 150 flats on the identified site means that the ability for this

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proposal to provide homes for decant from the Aylesbury Estate has been dramatically overstated. It has also not been made clear what mix of tenure is being proposed, which could have a significant impact.

Coupled with inevitable delays in attempting to obtain planning permission (which we do not believe would ever actually be granted), the benefits to the planners look minimal at best.

Finally, it is extraordinary that the planners who wrote this document should state openly that land designated as Borough Open Land (BOL) is "better" used when it is built on. We would welcome a clear and detailed explanation of the thinking behind this statement.

E. As commented above the green finger proposal appears only to be offered as a "package" under Option 2. SSRA argue strongly that it should be incorporated into Option 1 (subject to further clarification and consultation), possibly as an Option 3.

F. The statement that the land could be available "very early on" is remarkable and assumes that this proposal will not be vigorously opposed. The SSRA has taken legal and planning advice and is preparing, in consultation with KTRA, to mount a sustained campaign in order to ensure that Option 2 is never included in any formal Plan.

G. 2.5.56 is barely intelligible. Biodiversity is not defined in the Glossary, but it is given some sort of an explanation at 2.3.32.

The implication is that the loss of biodiversity in Surrey Square Park will somehow be compensated for by the biodiversity of the flats themselves ("opportunities to increase nature

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				<p>and wildlife are not just restricted to the ground." 2.3.32) and by the provision of open space elsewhere.</p> <p>In our view, it is simply not possible that the current biodiversity of Surrey Square can be enhanced or mitigated by the construction of flats on half the area of the Park.</p> <p>Furthermore, it is wrong to suggest that the degradation and partial destruction of Surrey Square Park can be compensated for by providing new areas elsewhere. The Park is an entity and environment in its own right and loss of half of its area can never be compensated for.</p> <p>For this reason, the section on page 93 (for and against) is misleading in the extreme. To state under the "Opposin Options" box that opposing options do not exist ('none') is wrong and should be amended. Please confirm that the report will be redrafted at this point.</p> <p>H. Option 2 is in direct contravention of the Council's headline policies outlined in the Southwark Plan (SP).</p> <p>SP 11 states that all development should protect and improve amenity and environmental quality and encourage sustainable development. Option 2 manifestly fails to achieve that.</p> <p>SP 15 states that all developments should, where appropriate, create, preserve and enhance open spaces, green corridors, traffic free routes and biodiversity. The benefits of open space include those associated with health, sport, recreation, children's play, regeneration, the economy, culture, biodiversity and the environment. Given that Option 2 envisages the complete loss and</p>	

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destruction of 50% of the Park, it is clearly impossible that it can either preserve or deliver any of the benefits and enhancements envisaged.

I. We strongly reject the proposal that policy should be amended in order to permit development on Surrey Square Park. We note that, on page 9 of the I&O Report, there is a specific reference to the losses that would be sustained by Surrey Square Park and the surrounding area:

"However, shortening this time would have a negative effect on the Housing and Open Space, Surrey Square, Retention and Burgess Park groups of options, as more residents would have to live off-site and open space would be temporarily or, in some cases, permanently lost to ensure the speedy completion of works".

We would question why this clear admission of loss and the stated negative effect was not specifically referred to in the Opposing Options on page 93? Once again, we reiterate our request that the report be redrafted at this point. It is biased.

J. Surrey Square Park is designated as Borough Open Land (Site ref. OS77 in Appendix 10 of the Schedule of Borough Open Land). The 2007 Southwark UDP states Policy 3.26 which, at Section 344, states clearly that planning permission for development will not be granted unless:

- i. it is ancillary to the use of open space; and
- ii. It is small in scale; and
- iii. It is required to enhance activities associated with particular open space; and
- iv. It is required to enhance activities associated with particular open space; and
- v. it positively contributes to the setting and quality of the open space.



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These principles have been consistently endorsed by all of the Southwark UDP's since 1995 and the Open Space SPG and Southwark Green and Clean Strategy.

You will understand from the use of the language that all five criteria must be satisfied to justify an exception. SSRA would argue that Option 2 offends against all five requirements.

Building a line of flats, probably of 5 or more stories, is not ancillary to the use of the space (one half is destroyed); is large in scale; detracts from the open nature and character of the Park; detracts from activities associated with the space and contributes negatively to the setting and quality of the space.

Option 2 is therefore in direct conflict with the Council's policies as outlined in the current UDP and should be rejected on this basis alone. However, it is also in direct conflict with recommendations made in CABE's "Start with the Park" paper - which had input from the masterplanners for the Aylesbury Urban Initiatives. I would like to suggest that Dr. Richard Simmons, Chief Executive of CABE, be asked to comment on the proposals through the CABE Audits and CABE Space.

k. Option 2 implies that the green finger is, in some respects, a substitute for the loss of 50% of the Park. SSRA strongly disputes that implication. It is not and can never be so. There are a number of reasons for this:

a) The quantity of local space accessible for the residents of the Kinglake, New Kinglake and Alvey Estates; Smyrkes Road, Mina Road and Bagshot Street, Exon Street, Freemantle Street, Madron Street, Minnow Walk and East Street east of Thurlow Street, would be significantly reduced. The green finger cannot

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be described as "open space" in the same way.

b) Its character would be fundamentally changed from a variety of spaces catering for the needs of different groups in the population (i.e. play space, kick about space, nature conservancy, sitting out area) to a 'traditional garden square'.

c) The substitution of a 'green finger' is inadequate because:

i) the 'green finger' cannot accommodate the variety of activity spaces that would be lost – thereby having a detrimental impact on health and well-being; and

ii) its safety would be compromised at its northern end because it would thread through the ends of the Kinglake blocks with little or no natural surveillance; and

iii) at the southern end, the access to Burgess Park would be compromised by a strategic, heavily trafficked route. Children needing to access the park for play would have to be accompanied; and

iv) Burgess Park is a borough resource and not a local play space. There is an ornamental lake opposite the proposed 'green finger' – with little space around it to accommodate other activities, should any be proposed as a substitute for those lost to Surrey Square; and

v) As described above under (1), the proposed green finger is of low quality and cannot, therefore, be considered a substitute for the high-quality open space that it to be destroyed.

l. There is a basic inequity involved in destroying the amenity and environment currently enjoyed by one group (the current residents who live in the immediate vicinity of the Park) in order to benefit an entirely separate group (the current and future residents of the redeveloped Aylesbury Estate). Option 2 seeks to solve a problem for

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the planners and the current residents of the Aylesbury Estate whilst creating a considerable problem for those currently living around the Park.

this is openly admitted in the I&O Report at page 9 (as referred to at (i) above).

m. On the basis of all the above, we consider that Option 2, is fundamentally biased. It has been written with the clear and stated intention of solving a problem for the planners to decant the Aylesbury Estate at the expense of the residents who live around the Park and, indeed, at the expense of the Park itself. Remarkably, as commented above, the Option is shown as having no "Opposing Options".

Taken together with the total lack of consultation, the lack of clarity and the extremely biased documentation in favour of Option 2, which is in clear breach of the existing planning guidelines, SSRA considers that Option 2 must be reconsidered, rewritten and represented. Not to do so would constitute a fundamental abuse of process.

n. Option 2 will have a profound effect on Surrey Square Infants and Junior Schools. We understand that the Schools have written to you separately and we would like to state that we fully endorse the views expressed in their letter of 10th December 2007.

o. Option 2 will, of course, have a dramatic effect on those residents of the Kinglake Estate who currently overlook Surrey Square Park, Not only will they lose half of the Park, the amenity areas, play areas and sports court which are part of the Kingleke Estate and direct access to what remains but they will lose light and live in a more crowded environment.

KTRA will no doubt be writing to you directly on just these issues. However, SSRA support the KTRA residents totally in their attempt to have this Option 2 withdrawn. We have had a number of joint meetings and will be doing everything possible to ensure that all issues are properly handled in future. This is a matter that affects a local community and our interests are the same.

You have given us very little time in which to respond and there may be other matters that we will need to raise at a later date. This is not, therefore, to be taken as an exhaustive list of objections – merely those on which we have focussed with the limited amount of information available. As stated above, we have been excluded from the consultation process, so there may be aspects of which we are unaware.

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32	116	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>1 The redevelopment of the Aylesbury Estate is supported in principle as is the intensification of development in this area.</p> <p>2 The AAP, as it is presented here at Issues and Options stage, presents a number of options and a fine level of detail. On one level this is welcomed as it gives local communities and stakeholders a good understanding of the range of options available. However GLA has concerns that presenting this level of detail, particularly on exact location of tall blocks, the housing mix and level of affordable housing, without a corresponding level of detail on the financial viability of the scheme presents stakeholders such as GLA with a dilemma. Whilst we are happy to express a view as to which options are considered to best fit London Plan policy, presenting the AAP in such detail at this stage will preclude us making contrary comments when viability information is available. Careful consideration therefore needs to be given as to how much detail is presented in the preferred options and subsequent submission version.</p> <p>3 The inclusion of the area wider than the estate itself including Burgess Park to the south, East Street to the north, Walworth Road to the west and Old Kent Road to the east is supported for the reasons set out in the AAP.</p> <p>4 GLA notes that the planning application for the redevelopment of the south-west corner of the estate, which is included in the AAP area and the housing totals set out within the draft AAP, has already been determined by Southwark Council without referral to the GLA. Whilst the application is below the thresholds for referral under the Mayor of London Order it is considered that redevelopment of land within the AAP area forms part of a more</p>	Noted.

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substantial proposed development on the same or adjoining land as the AAP area and therefore falls within the definition of an application of potential strategic importance under Article 2 of the Order and should have been referred to the GLA. Please ensure that in future applications of this category are referred to the GLA. In addition please forward copies of the application to GLA for information.

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32	117	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Tenure Mix Opt 1	<p>Housing numbers and affordable housing</p> <p>4The Mayor's policy on affordable housing is to seek 50% to be delivered on-site depending on financial viability.</p> <p>5London Plan Policy 3A.12 'loss of housing and affordable housing' states that UDP policies should prevent the loss of housing including affordable housing, without its planned replacement at existing or higher densities.'</p> <p>6Chapter 20 of the Mayor's Housing SPG sets out that 'estate regeneration and redevelopment schemes should be undertaken on the basis that there is no net loss of housing provision and no net loss of affordable housing provision.</p> <p>7In calculating if there is no net loss of affordable housing provision, former social rented properties sold under right to buy should be categorised as market sector provision....Replacement of social rented units by intermediate provision may be acceptable where this can be justified by a requirement to achieve a wider range of types of provision in a neighbourhood.</p> <p>8To achieve 100% replacement of demolished social rented units, development at significantly increased density may be necessary to generate sufficient value from market development to support replacement of affordable housing provision or to achieve a mixed and balanced community objective. In such a case, the net gain in total provision need not achieve the usual proportion of affordable housing provision expected from a new build development. Calculations of whether there is a loss of total housing or affordable housing can be made in habitable rooms rather than dwellings, where the</p>	<p>There are currently 2,759 units on the estate. Of these 506 (18%) are leaseheld. The remaining 2,252 units are social rented. Further information on the existing units on the estate is contained in the Baseline Report.</p> <p>Calculations will be made in habitable rooms as well as dwellings.</p> <p>The council is aware that off-site rehousing sites will be needed and is currently working on identifying these.</p> <p>The council notes that option 1 would be the GLA's preferred option. It also notes that options 2 and 3 would on balance be acceptable in policy terms, provided that these could be justified in terms of mix and viability.</p> <p>82% of units on the estate are currently social rented. There are no intermediate units on the estate. A key objective of the AAP is to create a mixed community which includes social rented, intermediate and private housing. The preferred option seeks to maximise reprovision of social rented housing and ensure that rehousing needs can be met, while introducing an element of intermediate housing and enough private housing both to ensure that there is a mix of tenures and to create a viable development.</p> <p>The council is currently undertaking financial modelling and this has informed the preferred option. A key objective of the AAP is that it must be deliverable. The council considers the preferred option meets that objective. It does involve some loss of affordable housing. The council considers this to be justified by the viability analysis. The council can demonstrate however that when all Southwark's estate renewal schemes are taken into consideration (Heygate, Aylesbury, Wooddene, Bermondsey</p>

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				<p>redevelopment of an estate is providing a housing mix more appropriate to the needs of both existing and prospective future residents – for example where there is increased provision of dwellings for larger households. ‘</p> <p>9 This approach is confirmed in the Mayor’s draft Housing Strategy:</p> <p>‘Estate renewal projects should make the most of opportunities to add to the stock and to diversify tenures and housing types, but should avoid a net loss of affordable housing.’</p> <p>10 It is noted that the existing number of homes on the estate is 2,759 (82% affordable and 18% privately owned through right to buy). Most are 1, 2 or 3-bed units with a few 4 bed units or studios. Total social rented homes at present is stated to be 2,150. However 82% of 2,759 is 2,262 and therefore clarification is sought of the accurate total of social rented currently on the estate.</p> <p>11 A recent housing needs survey that was carried out for the redevelopment of the south-west corner of the estate indicated that the greatest need is for 1 and 2-bed units contrasting with the borough-wide need for 2-bed plus units.</p> <p>12 A commitment has been made to the provision of units with generous space standards, this is supported by GLA.</p> <p>13 The objective to re-provide all of the necessary social rented homes- 1,800-2,000 depending on who wants to be re-housed is stated. However in order to comply with London Plan policy the final number of social rented homes on the estate should be based on no net loss of current affordable units and</p>	<p>Spa and Elmington) there will be no net loss of affordable housing on these estates.</p>



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this should be stated as the objective.

14 The options presented give a range of 300-500 intermediate homes. This would bring the total number of affordable housing units to a range of 2,100-2,500.

15 The number of private homes to be delivered is in the range of 2,000 to 3,000 with an assumed site capacity of 5,000 new homes.

16 In order to be London Plan policy compliant the AAP needs to deliver around 2,150 affordable dwellings.

17 It is noted that all the three tenure mix options work on the assumption that 5,000 units in total will be delivered with an assumption that 500-600 households will be re-housed off-site. Clarification is sought as to the location of the units that these households will be decanted to. The current density of the estate is 340 habitable rooms per hectare. Assuming the 5,000 unit total the density of the development will be around 600 habitable rooms per hectare. This falls within the range for urban areas where development is mostly flats as set out in the London Plan density location and parking matrix table 4B.1. Building at this density is supported by the GLA.

Tenure Mix one-minimum private housing provision

18 There are currently around 2,150 social rented units on the Aylesbury Estate. These are replaced in this option and additional new housing will be a mixture of private for sale 2,200 and intermediate 650 homes. The total of affordable units would be 2,850. This would deliver 56% affordable housing split 77% social rented and 33% intermediate. This option delivers the highest amount of

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affordable housing of all the options and is the best match for the GLA's affordable housing policies. Subject to viability this would be the GLA's preferred option. It is noted however that Southwark has doubts over the viability of this option as it limits the scope for private housing. Another option could be considered of increased private units and a decreased number of intermediate units.

Tenure Mix 2-medium private housing provision

19 1,800 social rented homes would be provided on site with an additional 30% of intermediate homes (around 650 homes). The balance will be for private housing- around 2,550. This option will deliver around 2,450 affordable homes and as such would be an increase on the current levels of affordable housing. This would deliver 49% affordable housing split 73% social rented and 27% intermediate. It is possible to justify the reduction in socially rented units by the need to balance the mix of tenure on the estate.

Tenure mix 3-maximum private housing provision

20 This option would deliver 1,800 social rented and 350 intermediate homes making a total of 2,150 affordable units. The balance would be 2,850 private units for sale. This provides for 43% affordable housing across the scheme split 84% social rented and 16% intermediate. Whilst this would not be GLA's preferred option it would be possible to build a case for this under the policies in the Housing SPG. It is noted that Southwark feel that this is the likely to be the most financially viable option.

21 At this stage GLA feel that option 1 is the best fit to GLA policy and thus our preferred option, although given viability both option two and three are likely to be acceptable, on balance, in policy terms. The implementation

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section refers to viability information that has already been produced. GLA requests that this information is shared in order to inform the GLA's final decision. It is also requested that the amount of affordable housing is calculated on a habitable rooms basis.

22 A financial viability appraisal will also need to look at the case regarding the unviability of providing a proportion of affordable housing from the market units.

23 In addition any programme to rebalance the tenure mix on the estate needs to be seen in the borough-wide context. Preliminary discussions with the GLA have been held on these issues and these will be on-going. If this is to be agreed a mechanism will need to be implemented in order for this borough-wide picture to be safeguarded and monitored.

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32	118	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Size of Homes Opt 1	<p>Dwelling size</p> <p>30 Only one option here is proposed, that of maximising family housing. Currently this is indicated as 35%. This approach is supported and is in line with GLA policy.</p> <p>31 Please note that GLA Housing SPG 2005 sets out a target housing mix. In the development as a whole 30% 3 bed plus units are sought. In the social rented sector 42% 3 bed plus units are sought. This is approach is supported by the Mayor's draft housing strategy which states in Table 3, pg 146 which also adds that 16% of intermediate homes should have three plus bedrooms by 2010/11.</p>	<p>The preferred option will ensure that 25% of new homes will have 3 or more bedrooms and 48% will have 2 bedrooms. The Size of Homes Option is based on the needs set out in the council's 2006 Housing Needs Assessment Update and our best current estimate of the housing needs of existing social rented tenants on the Aylesbury Estate.</p> <p>A greater proportion of social rented homes will have 3 or more bedrooms (around 45%). Around 15% of the private and intermediate homes would have 3 or more bedrooms.</p>

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32	119	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	New Homes Opt 2	Demolition or refurbishment 32Two options are presented regarding whether all the homes on the estate should be demolished and rebuilt or selected buildings should be refurbished. GLA does not have a strong preference as to which approach should be followed however it is considered that total demolition and redevelopment is likely to give increased opportunity for delivery of a better quality scheme. It is suggested that this decision is taken taking into account viability of the scheme overall. If the level of affordable housing can be increased given that refurbishment costs less then total redevelopment and a high quality scheme can still be delivered then GLA would support this approach.	Noted.

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32	120	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Housing and Open Spa	Housing Types and Open Space 33Two options are presented one with maximised access to private open space with more limited access to communal space and the other with limited private space (balconies only). The decision on this approach needs to be taken looking at the detailed scheme. The AAP needs to take into consideration the Mayor's draft Child Playspace and Informal Recreation SPG. This sets a target of 10 sq.m. of playspace per child as well as local provision for under 5's, under 11's and 12 plus. Maximising the use of land through less emphasis on private space would be supported if there is sufficient supply and quality of play-space provided.	Noted. The approach in the Preferred Options will be to provide play space according to the Mayor's Child Playspace standards. There will be no loss of existing open space and the new open space will significantly improve the quality of open space provision.
32	121	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Street Layout Opt 1	Street Layout The option of replacing the traditional street layout with green fingers is supported along with the provision of smaller street blocks and finer grain.	Noted

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32	122	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Distribution Opt 2	Distribution of new homes 34 Both option 1 and option 2 are acceptable in London Plan terms. However as option 2 is more likely to deliver higher densities and support increased affordable housing in financial viability terms this option is preferred by the GLA.	Noted. Our preferred option is based on "Distribution of homes (Density) Option 2" in the Preferred Options Report. The proposed option, which varies densities across the estate, will help to create a more interesting development with a greater variety and mix of urban forms. It will enable the development to be tailored to the local circumstances of each part of the area. Greater densities at Thurlow Street and near other facilities will both support and be supported by the improved public transport that will serve the area. Higher residential densities near parks and open spaces will give greater opportunities for more residents to live close to, or enjoy a view over, open space. They will generate the value required to support increased social housing and the viability of the whole development. Lower densities near to conservation areas and low rise development will ensure that the character of those areas is preserved.

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32	123	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Building Heights Opt 3	Building height 35 Options 3 (generally 2-10 stories with two 20 storey buildings) and 4 (generally 2-10 stories with three 20 storey buildings and up to six 15 storey buildings) are both acceptable in London Plan terms and are preferred on the basis that they are more likely to deliver London Plan policy 4B.1 with regard to maximising the potential of sites. It is not possible to state a preference between the two without seeing the details of a worked up scheme.	Noted. As part of the preferred options, the council has prepared a building heights strategy to outline the rationale behind the options being taken forward.
32	124	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Burgess Park Opt 1	Burgess Park 36 Five options ranging from minimum intervention, enhancing existing features, reflecting community diversity, healthier living and the park as an environmental resource. It is suggested that a combination of all four improvement options is considered. It must be borne in mind that the park is metropolitan open land and any development in the park needs to take this into consideration.	Noted.



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32	125	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	Surrey Square 37 Surrey Square is Borough Open Land and a site of local importance for nature conservation. Given that the area is not in an area of deficiency for either of the above categories, and due to the proximity of Burgess Park, building on part of it would not be precluded by London Plan policy. However a commitment would be needed that this is necessary for the deliverability of the scheme, that the area of space will be replaced elsewhere in the AAP area in direct compensation for the area lost, that mitigation measures will be put in place to protect the area that is left and that the remaining space will be sensitively improved. Clarification as to the extent of open space that will be built upon and the number of units deliverable is sought before it can be concluded that option 2 is acceptable.	Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.

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32	126	IO 2.3 IO 2.4 IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9	Sustainable Design Opt	<p>Sustainable Design and Construction</p> <p>38 In general the AAP is supported in terms of energy particularly the commitment to Sustainable Homes Code Level 4, the connection of the whole area with a Combined Heat and Power (CHP) and district heating systems, the use of a multi-utility service company (MuSCO) as the likely delivery vehicle for the network and future-proofing, (ie. the ability to switch to a renewable fuel for the CHP in the future) are supported.</p> <p>39 Additional comments are as follows:</p> <ul style="list-style-type: none"> <li>• In the preferred options document the section currently on page 36 regarding Standards for New Homes should have a bullet point discussing environmental standards and this should also be brought through into the fact box currently on page 37.</li> <li>• In the preferred options document the final bullet point currently 2.2.15 needs to be reconsidered, along with paragraph 2.2.17, in the context of the Council's aim for net zero carbon growth and to ensure that sustainable design and construction is at the heart of the design process. Paragraph 2.2.17 is not consistent with the London Plan or the proposed Further Alterations as it does not ensure that energy efficient design or the principles of sustainable design and construction are integral to the standards for new housing. The Council's proposed Supplementary Planning Document is a suitable way to provide details, but there should be a commitment to ensuring all development on the estate will incorporate sustainable design and construction, including energy efficient design, rather than encourage it. The primary commitment should be to ensure that sustainable design and construction is incorporated from the earliest stages of the design process, and that</li> </ul>	<p>Noted.</p> <p>Sustainable design and construction will be incorporated from the earliest stages of development. This will be ensured through the Sustainable Design and Construction Preferred Option. This option aims to ensure development results in zero carbon growth (see FB8); all new dwellings in the redeveloped Aylesbury area will achieve at least Level 4 (****) rating of the Code for Sustainable Homes (see FB8); and development meets the GLA target of 20% CO2 emissions reduction through the use of renewable energy supplies (see FB8). Furthermore all new homes will be designed to ensure they minimise energy use, using measures such as a high standard of insulation, natural ventilation, and shading from the sun to prevent overheating. The energy supply for the masterplan area will be generated by Combined Heat and Power (CHP).</p> <p>The CHP and district heating could be generated from gas fired boilers together with biomass fuel possibly provided by Southwark's own parks, streets and gardens. It is likely that the system will be run by a Multi Utility Services Company (MUSCo).</p> <p>As the redevelopment progresses, we will explore the feasibility of using other renewable energy technologies in the redevelopment of the estate. These could include alternative technologies such as photovoltaic panels and wind turbines.</p> <p>Our preferred option also considerably reduces the average water consumption per person through basic water saving measures like aerated taps and low flush toilets. Mains water could be conserved further by grey</p>

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				<p>schemes should prioritise passive design measures. In particular there should be a commitment to design schemes to minimise overheating for temperatures expected over the lifetime of the development. Paragraph 2.2.18 should be re-titled "energy supply", to ensure that energy efficient design is not lost within the commitment to achieve decentralised supply.</p> <ul style="list-style-type: none"> <li>• In the preferred options document the paragraph currently 2.2.19 needs to state that to achieve Code for Sustainable Homes Level 4 the current above average water consumption on the estate will need to be reduced down to 105lpppd (litres per person per day).</li> <li>• There is no reference to any feasibility work (either technical or commercial) done on a site-wide CHP and district heating scheme and if such work has been done, this should be mentioned here;</li> <li>• In the preferred options document the bullet point currently 2.3.27 needs to link back with Southwark's Sustainable Design and Construction SPD.</li> <li>• Biomass CHP is mentioned as a potential way of providing some of the renewable elements. Reference should be made to any feasibility work that has been undertaken and consideration of the source of the fuel and the air quality implications</li> <li>• The bullet point currently 2.3.26 discusses a MUSCo however there is no mention of other services such as water. This should be addressed in the preferred options document.</li> <li>• In the preferred options document the bullet point currently 2.3.28 sentence two should be amended to say that 'mains water should be conserved.' The targets in the Further Alterations to the London Plan should be included here.</li> <li>• In the preferred options document the bullet point currently 2.3.29 the inclusion of</li> </ul>	<p>water recycling, reusing rainwater or using groundwater (from a borehole) to provide water for non-potable uses such as toilet flushing, washing machines or watering the garden.</p> <p>Designing in adequate storage space for waste and recycling inside and outside homes will encourage recycling so that our target of 50% of the waste can be recycled. The space provided will be flexible so that it can adapt to new technologies and methods of waste collection in the future. We are currently investigating a range of options on how this target could be met.</p> <p>There is a target in the London Plan that 95% of construction waste is recycled. During development site waste management plans will be used to minimise demolition waste so that this target is met. Uncontaminated demolition waste might be used in the enhancing the landscape of Burgess Park or in aggregate in other parts of the redevelopment.</p> <p>In terms of biodiversity the potential for including ecological enhancements into the design of new buildings will be considered and tested. In addition to sustainable urban drainage mentioned before these enhancements could include bat and swift bricks, green/brown roofs and living walls.</p> <p>Furthermore, building materials will be sourced responsibly for example where possible reducing the need to transport over long distances. Materials will seek to achieve high green guide ratings for materials</p>

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32

127

IO 2.5

Biodiversity Opt 2

IO 2.6  
IO 2.7  
IO 2.8  
IO 2.9  
IO 3.1  
IO 3.2

Biodiversity

40 The implementation of green roofs will contribute to the proposed ecological enhancement of Burgess Park and their contribution should be acknowledged here

41 Further stages of the AAP and associated documents should consider how the Southwark Biodiversity Action Plan will be realised through this development opportunity.

Noted.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
32	128	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Transport Opt 1	<p>Transport</p> <p>42 The significant intensification of housing density and change in tenure, as proposed, will require careful planning and assessment of the local transportation networks. Further work on developing the transport strategy for the area should include:</p> <ul style="list-style-type: none"> <li>• Shortfalls in existing transport and movement infrastructure.</li> <li>• Existing and projected travel demands, identified by rate, direction, purpose and mode, of people living on and travelling to the estate. This must take into account the composition of proposed housing and other land uses.</li> <li>• The existing loadings, residual capacities, and proposed enhancements of public transport services, road links, and other movement corridors.</li> <li>• The extents to which the Cross River Tram option scenarios provide for increased development density.</li> <li>• Proposed development impacts in a No Cross River Tram scenario.</li> <li>• The quantity and quantum of other development that is likely to be introduced within the local area, and the cumulative impacts on affected overlapping transport infrastructure.</li> </ul> <p>43 This information should be validated against the capacity available to meet projected trip demands, for all transport corridors, for each development phase, in both with and without Cross River Tram scenarios.</p>	<p>Noted. The council is working with TfL on options for improving public transport services in the area. A number of transport scenarios have been modelled including a no-tram scenario.</p>

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32

129

IO 2.7  
 IO 2.8  
 IO 2.9  
 IO 3.1  
 IO 3.2  
 IO Glossary  
 IO Indices

Transport Opt 2

Getting about

44In 2.7.8 it states that Thurlow Street will be a public transport corridor because it is the possible route of the tram. It is the suggested route of the tram because it has heavy demand and therefore needs to be a public transport corridor irrespective of the mode. TfL suggest that this is changed to reflect this point.

Noted.

45TfL suggest that the preferred option should be a combination of all three options as they all appear to be complementary, and a strategy to promote walking, cycling, public transport and the urban realm would be very welcome, particularly if aligned with the car parking restraint measures mentioned elsewhere in this document.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
32	130	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Tram Opt 1	<p>Cross-River Tram route</p> <p>46 At present TfL are not in a position to be able to specify which route is preferred due to the need for further work on route options. The decision on a preferred Tram option will need to be informed by further work by the Cross River Tram Team at TfL in consultation with the Borough and other parts of TfL. However, TfL will continue to work closely with the borough to select the best route possible. TfL will also continue their close dialogue with the Council, particularly in relation to discussions relating to their suggested third option.</p> <p>47 Route options 1 and 2 would equally be beneficial if bus services were improved along these routes. A mention of this benefit would be helpful.</p>	<p>Noted. Since the decision on route choice is at present with TfL, we are not consulting on these options again. We assume the main alignment will be along Thurlow Street and the only potential differences will be how they travel through or near the park. The plan will be flexible enough to enable any one of these options to be delivered. However we do have a preference for three stops to be located within the AAP area.</p> <p>The scenario of no tram will be considered in detailed transport modelling. This will look at increasing the number of buses on Thurlow Street. Initial work has shown that similar improvements in public transport accessibility levels (PTALs) can be achieved by improving bus services.</p>

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
32	131	<ul style="list-style-type: none"> <li>IO 2.7</li> <li>IO 2.8</li> <li>IO 2.9</li> <li>IO 3.1</li> <li>IO 3.2</li> <li>IO Glossary</li> <li>IO Indices</li> </ul>	Car Parking Opt 1	<p>Car Parking</p> <p>48 TfL strongly supports the option of providing for appropriate levels of car parking, particularly the standpoint of providing for up to a maximum of 4 car parking spaces per 10 households, varying according to PTAL levels. TfL considers this to be an appropriate car restraint based policy which is in conformity with the London Plan and Mayor's Transport Strategy. Such a restrictive parking approach is supported due to the Council's intention to support improved sustainable transport facilities that will be provided as part of the wider transport strategy for the area.</p> <p>49 The proposal to provide car free development where public transport accessibility is high is strongly supported (Paragraph 2.7.21 reads 'or be entirely car free if access to public transport is much improved'). This also has support in the 'Further Alterations to the London Plan', paragraph 3.196 which states "The Mayor supports the use of car clubs and car free or virtually car free development where appropriate". The provision of car clubs should be added to this section.</p>	Noted.



<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
32	132	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4	Proposed New Opt (ple	<p>Transport Omissions</p> <p>50 The APP will eventually lead to major planning applications being submitted as redevelopment of the estate progresses. It would be useful, as this AAP is developed further, to include a reference to the need to ensure that any planning application that is referred to the Mayor is developed in accordance with TfL's "Transport assessment best practice guidance document" (May 2006).</p> <p>51 This will ensure that all forms of transport are examined as part of a planning application and that appropriate mitigation measures for transport are put forward, and that walking, cycling and public transport modes are fully taken into account and promoted wherever possible.</p> <p>52 As the AAP develops it may be useful to include a section or policy on the need to seek contributions generally for public transport, walking or cycling.</p> <p>53 TfL suggests the policy includes explicit support for pooled contributions for public transport, as advocated in circular 05/05. Details on any S106 tariffs should be included if these are to be used to support regeneration.</p> <p>54 TfL periodically enters into Section 106 agreements, as co-signatory with boroughs, if TfL is required to provide the transport infrastructure required as part of the agreement. This often assists in determining the details of the scheme and delivery of the infrastructure. A reference to this in the policy would be helpful.</p>	Noted.

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32	133	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Local Services Opt 2	Local services Options 55 Option 2, centralising local services around Thurlow Street, is preferred as it will ensure the viability of the shopping area. Consideration should be given to the location of 'corner' shops within the housing areas.	Noted.
32	134	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Sport and Leisure Opt 2	Sports and Leisure 56 Both options, local facilities in estates and increased use of Burgess Park, should be included within the development proposals. As set out above the requirements of the draft Child Playspace and Informal Recreation SPG need to be taken into consideration as do policy considerations for development in MOL.	Noted.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
32	135	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Health Provision Opt 1	Healthcare 57 GLA agree that healthcare needs to be properly provided for and considered in all aspects.	Noted.
32	136	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Education Opt 1	Education 58 GLA agree that all options need to be considered.	Noted.
32	137	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Arts and Culture Opt 2	Arts and culture 59 GLA support the increase in local facilities proposed however the provision of community and voluntary sector facilities should also be considered in line with London Plan policies 3A.15 and 3A.16.	Noted.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
32	138	IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2 IO Glossary IO Indices	Shopping Opt 1	Shopping 60 The increase in units in the area will create a market for small shopping facilities within the area however provision should not introduce conflict with the existing shopping areas of Walworth Road and that planned for the Elephant and Castle. Consideration should also be given to peppering small convenience stores throughout the area.	Noted. The size of facilities proposed is small scale and will not compete with existing shopping areas.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
32	139	<ul style="list-style-type: none"> <li>IO 2.7</li> <li>IO 2.8</li> <li>IO 2.9</li> <li>IO 3.1</li> <li><b>IO 3.2</b></li> <li>IO Glossary</li> <li>IO Indices</li> </ul>		<p>Implementation</p> <p>61 Two options are presented for developing out the scheme. It is considered that the Master developer partner option would be preferred as it would provide the most assurance that the development will proceed. The other option of the council disposing of sites in stages is also acceptable if the master developer option is unfeasible</p> <p>62 Three phasing options are proposed and they are dependant on which tenure mix is chosen. GLA requests that clarification is given as to how the use of Surrey Square reduces the build out time by three years and as to the likely length of programme for the additional tenure option GLA has suggested above. It is noted that option three allows for delivery if the tram and Elephant project do not go ahead in the timescale envisaged currently.</p>	Noted.

<i>Objector Ref</i>	<i>representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
32	140	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>LDA comments</p> <p>52 In accordance with the objectives in the London Plan and the Economic Development Strategy, the LDA seeks to promote sustainable growth and economic development and deliver healthy, sustainable, high quality communities and urban environments. Major infrastructure and development should contribute to the creation of sustainable communities. Developers and Boroughs should seek to maximise the positive impact on disadvantaged areas and address the needs of those facing discrimination, inequality and social exclusion. Development should be implemented in ways that maximise the benefits for, and minimise any adverse effects on, local communities and businesses.</p> <p>53 The Aylesbury Estate is situated within the London Borough of Southwark which is located in the Central sub-region. It is situated close to a designated Area for Regeneration, and close to the Opportunity Area of the Elephant and Castle. In line with the London Plan policy 5B.1, the strategic priorities for the Central London sub-region will be to identify capacity to accommodate new job and housing opportunities and appropriate mixed-use development and the ensure that new development is sustainable, safe, secure and well-designed, and that social and community infrastructure is retained, enhanced and expanded where needed.</p> <p>54 The LDA supports the Borough's Sustainable Development Objectives outlined in the AAP, in particular SD0 15 "To provide everyone with the opportunity to live in a decent home". In line with this objective the Borough should ensure that the full range of housing needs in the area is identified in line</p>	Noted.

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with policy 3A.4 Housing Choice of the London Plan. The development should offer a range of housing choices, in terms of the mix of housing sizes and types.

55 The AAP should ensure that the development provides opportunities to assist in skills action and targeting of job opportunities to local communities in accordance with policy 3B.12 Improving the Skills and Employment Opportunities for Londoners. The LDA welcomes the Borough's recognition that it is important to ensure that the redevelopment of the Aylesbury Estate brings local economic benefits through their Local Economic Benefits Options 1, Local Procurement and Option 2, Local Employment and Training. The redevelopment should be used as an opportunity for local businesses to supply goods and services to the area, and that local people should be involved in the construction phase of the development as well as the non-residential elements of the completed development.

56 The Borough should ensure that a Section 106 Agreement is put in place and that the following more specific elements be attached to the agreement:

- A programme for skills training for local residents and/or businesses, including the potential for the provision of suitably equipped training premises.
- Local publicity, awareness raising proposals and methods for advertising employment opportunities and impending contracts.
- Initiatives to promote the involvement of local businesses including sub-contracting and the supply of goods and services.

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				<ul style="list-style-type: none"> <li>• Initiatives to promote the employment of small and medium businesses.</li> <li>• Initiatives to promote the employment of black and ethnic minority owned businesses.</li> <li>• Initiatives to address other barriers to employment, and to factor in childcare issues.</li> </ul>	
				<p>57 In line with London Plan policy 6A.4 Priorities in Planning Obligations the Borough should ensure that in addition to affordable housing and public transport improvements priority should also be given to learning and skills and health facilities and services and childcare provisions. It is therefore very important that the Borough ensures that the range of facilities for pre-school children and their families currently available in the Aylesbury area are both safe-guarded and upgraded. This will ensure that the objective "Tackling Barriers to Employment" in Chapter 4 of the EDS is met.</p>	
				<p>58 The LDA welcomes Business and Employment Support Option 1, Agency Relocation, with the provision of a permanent business and employment support agency within the area, supporting and encouraging vocational and skills training. The LDA also supports the Borough's proposal of a Central Business Incubator outlined in New Employment Accommodation Option 1. This option supports the EDS objective in addressing barriers to enterprise start-up, growth and competitiveness in Chapter 5, Investment in Enterprise. London's enterprises, especially SMEs need an adequate supply of suitable workspaces getting access to start-up, equity and growth finance has been particularly problematic for many BAME entrepreneurs. Consequently, the LDA supports the Borough's AAP proposal to</p>	



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provide business incubation facilities. The Borough should however, ensure that there is further detailed analysis carried out in order to ensure that this facility is delivered successfully and sustainably.

The Mayor will issue his formal opinion on the general conformity at the submission stage. However, I hope that the policy concerns he has raised at the current stage can be resolved before then, through further informal discussions with Council officers.

<i>Objector Ref</i>	<i>resentation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
33	141	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	<p>Myself and my partner are long term residents of the Kinglake Estate and have been horrified at the recent coming-to-light of the proposed plan to build on Surrey Square, our play areas and wild-life area.</p> <p>We are in agreement that the area can be improved, but fail to see how the decanting of people from the Aylesbury to our green areas and play areas can help our residents or indeed the 'decantees'.</p> <p>I have a young son and have been looking forward to the development of the children's playground that has been sorely neglected for many years. Funding has been raised and we were promised that it would be started by next March. We now hear that this close-by play area is being taken from us. Where are our children supposed to play? Burgess Park is that bit too far away for children to be unaccompanied.</p> <p>Our 'wildlife' area is opposite my flat and I regularly watch the foxes that frequent it, the robins, wrens and blackbirds that rest there and appreciate that even here, in the middle of a very dense and built up area I can see some nature and teach it to my son. It is a valuable place for children to build camps and play in with the feeling of a woodland but within calling-distance from home. The basketball and football courts are in constant use, although in bad need of repair and the green area of Surrey Square, needed as a 'field' for children and adults to unwind. Surrey Square school needs it as they don't have a recreation field and we all need the space in which to breathe. It could be landscaped and improved with planting and regular clearing with the dog mess removed.</p> <p>It seems ridiculous that as the Government is</p>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p>

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so interested in obesity and the lack of exercise in the young, they are so prepared to remove the few areas that we people, who need it, have left to us. We already live in such a built-up area.

No one that we have spoken to supports the building plan and everyone's reaction has been one of indignation and horror that this could even be suggested.

By all means improve our run-down area, but surely not at expense of our 'room-to-move-freely' areas.

All ages need this space – it's all much used. As other areas are increasing their green spaces it seems a terrible sadness that our council is so prepared to throw away those that it has under the guise of improvement. I think if we lived in wealthier boroughs it wouldn't even be considered.

Please don't make the areas population denser than it already is. The people who had this idea surely don't live here? By all means improve the Aylesbury and Kinglake Estates, but not to the detriment of it's residents.

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34	142	IO 2.5 IO 2.6 IO 2.7 IO 2.8 IO 2.9 IO 3.1 IO 3.2	Surrey Sq Opt 2	<p>The purpose of this letter is to record our determined and united opposition to Option 2. We have many reasons to substantiate our view and these are set out below.</p> <ol style="list-style-type: none"> <li>1. The proposal contradicts existing Council planning policies. See Planning Policies SP 11, SP 15 and 3.26 of the Southwark Plan, each of which sets out to preserve Borough open land and biodiversity. Surrey Square is named within the document as Borough Open Land as a Site for Nature Conservancy (SINC).</li> <li>2. The Sustainability Appraisal Scoping Report refers explicitly to Surrey Square (p33) in the context of the need to preserve open space and that need is then confirmed in Sustainable Development Objective 13.</li> <li>3. The Interim Sustainability Appraisal Aylesbury Area Action Plan states regarding Option 2 [shortening development time]: 'However shortening this time would have a negative effect on the Housing and Open Space, Surrey Square, Retention and Burgess Park groups of options, as more residents would have to live off-site and open space would be temporarily or, in some cases, permanently lost to ensure the speedy completion of works.' (p.9). Option 2 therefore is not in accordance with the Council's own policies and lies outside the points for reference of the Scoping Report which was the first stage of the AAP. This reason alone should be sufficient to regard it as invalid.</li> <li>4. Taking Option 2 at face value, the arguments against it are: <ol style="list-style-type: none"> <li>a. The quantity of local open space visible or accessible for the residents of the Kinglake, New Kinglake and Alvey Estates; Surrey Sqare, Alvey St, Smyrkes Rd, Mina Rd &amp; Bagshot St; Exon St, Freemantle St, Madron St, Minnow Walk and East St east of Thurlow St would be significantly reduced. Green</li> </ol> </li> </ol>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next stage.</p>

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space itself has an inherent calming value and its destruction would be detrimental.

b. The activities currently taking place in the Square could not be accommodated in its reduced area. These are an area for football, a sitting out space, the wildlife nature garden, a play space for younger children, and a dog walking area. Surrey Square School use the park regularly for a wide range of activities, including environmental projects, carnivals, and charity challenges. The park offers an expanse of grass within close and safe walking distance, and within sight of the school, and serves as both a sports field and picnic area for children and their families.

c. Surrey Square Park is a valuable local amenity, used by all sections of the community. Between 1999 and 2004, local residents formed an action group, (Surrey Square Park Action for the Community and Environment - SSPACE), and worked alongside Groundwork Southwark to deliver a number of improvements, including a children's playground, grass football pitch, a community garden, and two murals which were produced in conjunction with the children from Surrey Square School. There have been many fairs and community events on the park, which bring the neighbourhood together and improve social cohesion.

d. Kinglake TRA are currently working with Cleaner Greener Safer to greatly improve the playground and sports cages along the southern edge of the park, and have been working hard to raise funds to do this. An Easter Fun Day was held this year at the playground, as part of a consultation with children and parents of the area. In August, in partnership with Groundwork, KTRA provided a series of open-air workshops for local kids, to have a go at stone carving, clay modelling, and t-shirt printing. A questionnaire was conducted during this event, which revealed

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that local children need a local space, where they can play in a traffic-free environment, unaccompanied by adults, but within close reach of home.

d. The 'green finger' cannot accommodate the variety of activity spaces that would be lost – thereby having a detrimental impact on social cohesion, health and well-being;

e. At the northern end the proposal seems to be to demolish two blocks on the Kinglake Estate – which perhaps is a drafting error;

f. If the existing blocks were to remain at the northern end safety would be compromised because the finger would thread through the ends of the Kinglake blocks with little or no natural surveillance;

g. At the southern end, it is necessary to cross Albany Road, a strategic heavily trafficked route, to access Burgess Park. Children under the age of seven or eight needing to access the park for play would have to be accompanied, as was established by Groundwork in their work with the KTRA in summer 2007;

h. Burgess Park is a borough resource and not a local play space;

i. The new blocks would also require amenity space;

j. Impact on car parking: the new dwellings would require some parking space which would further reduce the open land available so that the proposed 'garden square' would become very small indeed;

k. Surrey Square Infants and Junior School would lose a valuable green space for children to play in;

l. The majority of tenants and residents on the Kinglake Estate do not have balconies and the reduction of local, neighbourhood open space would have an immediate detrimental impact on their health and well-being. Finally we wish to draw your attention to the historic importance of the Square which is

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<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
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mentioned in Pevsner. The proposed creation of a 'traditional garden square' off-set from the palace front of the magnificent eighteenth century facades of the terrace is a travesty of the architect's original intentions.

<i>Objector Ref</i>	<i>Representation Ref</i>	<i>Section</i>	<i>Option</i>	<i>Details of Representation</i>	<i>Officer Response to Representation</i>
34	143	IO 1.1 IO 1.2 IO 1.3 IO 2.1 IO 2.2 IO 2.3 IO 2.4		<p>The first major point is to protest at the lack of effort that has been made to consult any of the associations on the Aylesbury AAP. Whilst it is understandable that the focus should be on the 7,000 tenants and leaseholders on the Aylesbury Estate itself, the exclusion of representatives of three of the estates that are covered by what will be the planning document for the area under the new Local Development Framework is indefensible. We use the word 'exclusion' not for effect, but as a precise description of the treatment of our representatives who have not been sent any of the documents, from the scoping report to the interim sustainability report to the issues and options report and questionnaire. It was only by chance that the Secretary of the KTRA found out about the proposal for building on Surrey Square contained in Option 2 (S.2.5.54 p92 &amp; Fig 23 of the AAP Issues and Option Report). We regard this lack of consultation as inequitable.</p>	<p>Noted. While letters were sent out to the tenants and residents associations, the council acknowledges that residents around Surrey Square could have been better involved in the consultation process. Two meetings have taken place with residents and representatives from the T&amp;RAs around Surrey Square and the council will endeavour to ensure that residents around Surrey Square are included in all future consultation about the area action plan.</p>