

Peckham and Nunhead Area Action Plan

Development Plan Document

CD5 - Consultation Report - Appendix O

March 2013

Towards a Preferred Option comments and officer responses

Fairer future ✓
Delivering our promises



Future Peckham



Peckham and Nunhead Area Action Plan Publication/Submission version

Consultation Report: Appendix O

**Comments received and officer responses
at the towards a preferred option stage**

March 2013

This document is part of our Consultation Report for the Peckham and Nunhead Area Action Plan (AAP). It should be read alongside the Area Action Plan, the remaining parts of the consultation report and the other supporting documents.

This document is Appendix O of the Consultation Report and it sets out all of the response received at the 'towards a preferred option' stage and our officer comments on these representations.

PNAAP Towards Preferred Options

Representation Ref	Object or Ref	Section	Main Policy	Development sites	Details of Representation	Officer Response to Representation
7	493	Other	Policy 3		I have looked at the options thinking about supporting improving nutrition for local residents. Whilst supporting choice as well as local business opportunities I think that this is one important aspect which has the possibility of positively affecting health of local people. I work in a local maternity service and we have the evidence that maternal obesity is a growing significant problem for many local women. The black African community are disproportionately affected and experience a higher level of pregnancy diabetes and are at much higher risks of infant mortality. Planning needs to do all that it can to make it easier for the parents and the children to be able to make small lifestyle changes that shift this risk. This includes increasing easy availability and affordability of lower fat and tasty food. Currently we are in the middle of research about helping obese pregnant women to make small changes to their and their family's diet, small increase in activity and increasing their knowledge and understanding as to how this can make a difference. They receive a booklet that gives detailed information of prices and location of relevant foods/drinks. We are building up the knowledge of how easy or hard this is to do in both Southwark and Lambeth. Already the results are showing that with these small changes their physiology is changing towards a significant improvement. This impacts on the mother's health, her unborn baby and for future pregnancies. I think that the do nothing option is inappropriate as structurally this will mean that the status quo contributes its part to the continuing problem of obesity and ill health. I would like to see the other TWO options adopted for this 15yr plan. Exclusion Zone around schools AND the limiting of number of this type of hot food outlet in the whole area. In this way anyone can opt to choose to buy this food but it will be easier to take a healthier option more frequently	We have set out in the Preferred Options policy 4 (Hot Food Takeaways) that we will restrict further growth of A5 use. This includes the two approaches of establishing a 400m exclusion zone around secondary schools and limiting the number of hot food takeaways to 5% and also preventing clustering of A5 units in Peckham and Nunhead town centre protected shopping frontages.
8	492		Policy 3		I am sending a response to your question regarding hot food takeaways in Peckham & Nunhead and the importance to public health. I believe that it would be a good step towards improving public health by choosing Option 2 - creating an exclusion zone around schools of hot food takeaways. Ready access to this type of food either travelling to/from school or for lunchtimes is not appropriate. Children (and many adults) will make decisions on what to eat based on: 1) Does it taste good? 2) How much will it cost me? Takeaway food in most instances is high in fats and sugars (which is why it tastes good) and in most instances, sold for pennies which makes it affordable. Offering these foods on their doorsteps actively encourages school children to make the 'wrong' food choice. Children are becoming larger and in most cases, this starts from a very early age. Although tackling the wider issue around education, parenting, poverty is not possible with this intervention, ensuring that the food offered within a radius of any school is a healthier choice is a good place to start.	We have set out in the Preferred Options policy 4 (Hot Food Takeaways) that we will restrict further growth of A5 use. This includes the two approaches of establishing a 400m exclusion zone around secondary schools and limiting the number of hot food takeaways to 5% and also preventing clustering of A5 units in Peckham and Nunhead town centre protected shopping frontages.
9	494		Policy 3		Re: Peckham and Nunhead Hot Food Takeaway Options 1, 2, As the head teacher of St James the Great Roman Catholic Primary School in Peckham I am very concerned about the impact of weight on the health of children. Overweight and obese children are also more likely to become overweight and obese adults. As adults, they are more likely to develop ill health such as hypertension, diabetes and heart disease. I am writing in response to the Peckham and Nunhead Area action plan (PNAAP). Peckham in particular is one of the wards in Southwark with the highest levels of obese and unhealthy weight children. Because of my concerns, our school participated recently in a consultation event to advise the PNAAP. Pupils from year 6 together with guests from the local community discussed the impact of take-aways on health. We also discussed how best to manage the number of take-aways near schools. The participants thought that the number of take-aways should be restricted near schools, also that the hours of opening should not coincide with the end of the school day. Participants also discussed healthy alternatives. It is of particular importance to our school as within a 5 minute walk there are at least 18 ready to eat food outlets of which more than 10 are take-aways. Many of these outlets offer unhealthy menus targeting school children, for example chicken wings and chips for £1.00. I hope you will value our children's health. I strongly urge you to implement Option 1 and 2 and create as stringent controls as possible.	We have set out in the Preferred Options policy 4 (Hot Food Takeaways) that we will restrict further growth of A5 use. This includes the two approaches of establishing a 400m exclusion zone around secondary schools and limiting the number of hot food takeaways to 5% and also preventing clustering of A5 units in Peckham and Nunhead town centre protected shopping frontages.

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10	495	5.2-Stes for major develop ment;		14	Choumert Road Car Park Site am writing to give my views on the recent news that has been circulating Peckham about future plans for the Choumert Car Park. I have heard that there are plans to turn it in to either a block of flats or a small park. I would love there to be a park, but would be really sad if there were yet more buildings put in to the area. It is a beautiful peaceful place with Rye lane right next door for something a bit more lively. It seems such a shame to destroy this. Do you have any information for a petition to sign against the flats being built?	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
11	496	5.2-Stes for major develop ment;		14	Choumert Road Car Park Site I believe building 4 story housing there would be tragic. The area would truly benefit by having more green to look at and would give existing residence something nice to look at. Please inform me of how I can help fight against the plans for the housing.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
13	497	5.2-Stes for major develop ment;		14	I am writing with my concerns regarding the proposed development of the Choumert Grove car park. My home backs directly on to this site and so I have a strong personal interest in any development. Although I welcome regeneration in the area I have reservations about the proposals in the PNAA, as outlined on pp. 122-123. Primarily, I do not see why the proposed residential buildings need to be four storeys high. This is out of keeping with the area and it should be noted that the site is on the edge of the proposed Rye Lane Conservation area. Why build above the height of existing properties? The result will be unsightly, inappropriate for the neighbourhood and reduce light flow. Much effort has been made in recent years to enhance this area of Peckham (which, with its tree-lined streets and attractive Victorian terraces, is deserving of preservation and support) -- four storey blocks will be a retrograde step. I note that when the gate houses at Quantock Mews (positioned on Choumert Grove) were built the council required the developer to reflect (at least approximately) the corresponding houses at the end of Choumert Square: I am surprised therefore that the same council should think it appropriate to build a long four storey block adjacent to these. Well designed, low density housing with plenty of space around -- not built right up to the property lines or excessively high - will serve a useful social purpose and enhance the area. I urge you to adopt a more forward thinking approach and to work to create a development of which we can be proud -- and to resist the temptation simply to build as many low cost new homes as you think the area will stand. I would also seek clarification as to the meaning of 'private amenity opportunities' as mentioned on the plan. If this is green space then I have no objections but this area backs directly onto my property and anything which increases footfall or noise levels would be unreasonable. I note that another suggested acceptable use for the site is listed as retail. I	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.

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					object very strongly to this. Despite the fact that the site is currently used as a carpark it is very quiet; increased retail use will bring intrusive noise into what is essentially a residential area. Retail development should stop at the high street. I believe the council would better serve the area if it worked to improve and develop Rye Lane rather than expand retail spaces into a residential part of Peckham. Any stores would certainly be open until late in the evening and cause disturbances to residents. Moreover, what consideration has been given to who will occupy these retail spaces? Peckham emphatically does not need any more discount stores, hairdressers or cheap butchers. There is a danger that Rye Lane will simply spread into a new area -- an outcome that will not be beneficial for residents or for the traders of Rye Lane. The end of the Choumert Grove car park currently provides a useful recycling area for the neighbourhood. I hope this will not be lost in any development plans. Thank you for your attention. I hope residents will be fully consulted regarding future plans and I look forward to hearing more	
14	498		Policy 3		Re: Peckham and Nunhead Hot Food Takeaway Options 1, and 2, We are joint head teachers in Peckham. We are aware of Southwark's statistics on obesity particularly of children in years 1 and 6. Overweight and obese children are also more likely to become overweight and obese adults which can lead to ill health such as hypertension, diabetes and heart disease. We are writing in response to the Peckham and Nunhead Area action plan. Our school ran a consultation with the pupils specifically to inform the action plan. Of nearly 90 children, more than two thirds agreed with the proposal that the number of take-aways should be restricted near schools. Prior to the consultation event Year 6 pupils, had visited Cambridge and had noticed that there were far fewer take-away outlets than in Peckham. The children reported that there are 17 take-aways near the school that they visit, some frequently. In preparation for the consultation event, Year 5 pupils visited a selection of these. They looked at the prices and foods on offer. They commented on the lack of healthy options and that some outlets give cheaper prices to children in school uniform. We support a combination of both Option 1 and Option 2 to limit the number of hot food takeaways in the town centre and shopping parade as well as to create an exclusion zone around schools where new hot food takeaways will not be given planning permission. We urge you, in relation to Option 1 to at least match the strategies of other boroughs such as Barking & Dagenham and Waltham Forest. In those boroughs, no more than 10% of shopping frontages can be hot food take aways (i.e. 2 in 20 shops). Southwark has already set a limit in some areas such as Canada Water of 15% i.e. 3 in 20. As Southwark has one of the highest levels of childhood obesity, we would suggest a limit of 5% (i.e. 1 in 20). As many takeaways are in close proximity to schools, we are also keen that Option 2 is also adopted i.e. the creation of an exclusion zone around schools. Our pupils are knowledgeable on the impact of a healthy diet on health and are keen to implement healthy strategies into their lives. It is important that Southwark Council supports food outlets providing healthier options near schools, this may be by reduced business rates or rents. As a Healthy School we support physical activity and healthy eating activities. The environment in which children do this is extremely important in supporting the achievements we make to improve children's health and education. We hope you will also value our children's health. We urge you to implement Option 1 and 2 whilst supporting alternative outlets to provide affordable, healthier options	We have set out in the Preferred Options policy 4 (Hot Food Takeaways) that we will restrict further growth of A5 use. This includes the two approaches of establishing a 400m exclusion zone around secondary schools and limiting the number of hot food takeaways to 5% and also preventing clustering of A5 units in Peckham and Nunhead town centre protected shopping frontages.
15	499	5.2-Stes for major development;		14	Choumert Road Car Park Site As a local resident with a child, I would strongly urge the council to reconsider its plan to build on the Choumert Road Car Park, especially with buildings of four storeys which is out of keeping with the low-rise housing in the area. This part of Peckham is lacking in good green spaces and this area could become an oasis in an urban location. Given the recent disturbances in Peckham, any initiative that promotes community spirit and well-being would be more welcome than high density housing.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car

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						parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
16	500	5.2-Stes for major development;		14	Choumert Road Car Park Site I am deeply concerned at the proposal to build high-density housing on the site of the car park. I think this is wholly inappropriate for the area. I support the idea of using the space for a park. Given the long waiting lists for allotments in the area, some of the space should be used as allotments or a community garden project of some kind.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
17	501	5.2-Stes for major development;		14	Choumert Road Car Park Site I live in the area and walk up Chadwick Road to meet my girlfriend each evening. One of the things I love about the walk is the fact that you can see the sky, there is plenty of daylight and it feels relaxed. To build a 4 storey housing at the end of this road would ruin this. It would also spoil the area in the fact that at present, the houses are not very tall and it gives a sense of space and is less oppressive than areas with lots of tall houses. This is one reason that I moved to the area. Also, I cycle to and from work through this area. At present, there are a lot of cars, and pedestrians, and the roads are narrow. It is sensible to have more cars and more people in the area? The area would be far better used as a play area or area that could be used as a market. The Dog Kennel Hill play area is not available for public use at the weekends and the one on Goose Green is already very very busy. The need for areas for children to be safe and active far outweighs the need for more housing, right next to a station that is reducing its transport links to central London. If children have nowhere to play, they live more sedentary lifestyles, become overweight, eventually diabetic and will cost the government millions more pounds to look after. To progress with a redevelopment here would be awful	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
18	502	5.2-Stes for major development;		7	Please use this as open green play space - we need it more than ever Bellenden Road retail park	The owners of the site have no current plans for redevelopment so the site will continue to be used for retail, however we have retained the site in the AAP and have amended the land uses that we would require there in case it comes forward in the future.
19	503	5.2-Stes for major development;		14	Choumert Road Car Park Site I would like to add my voice to the growing swell of public opinion, calling for this site to be used as a public space and park. I believe the proposal for the site to be developed into thirty housing units 4-storeys high, is deeply inappropriate for the area. It is on the edge of the Holly Grove Conservation Area, and within the proposed Rye Lane Conservation Area, and 4-story blocks would be out of keeping with what already exists in the area. Perhaps more relevantly, the town centre is highly built up and the PNAAP is proposing an increase in density to housing and greater provision of family housing. The area is already seriously lacking in open green space and play facilities for children, and this site would seem to provide a significant opportunity to create a new park and open public space for the area. I strongly propose that this should be considered as a high priority.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert

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						Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
20	504	5.2-Stes for major development;		14	<p>Choumert Grove Car Park. I live in Quantock Mews (Choumert Grove) and it has come to my attention that you are discussing plans to develop the Choumert Grove Car Park. You propose to build 30 residences, of 4 floors each, and I have indeed seen the plan you have circulated. I write to you with my objections and concerns regarding this plan, as set forth in the PNAA, pp. 122-123. I think that it would be completely unnecessary to raise 4 storey buildings on this site. These buildings would clash with the area and would detract from the appeal of such quiet and leafy streets as the adjoining Chadwick Road. In addition to that, as our garden backs on to the car park and our windows overlook it, raising 4 storey buildings would significantly reduce the light that comes into our home and will indeed completely alter our view. However, my main objection to the height of the buildings proposed is that it would not be in keeping with the general character of the neighbourhood (e.g. Victorian terraces of Choumert Grove, Chadwick Road, Blenheim Grove, the Almshouses on Choumert Road, etc.); Choumert Grove needs similar, considered handling as it sits on the edge of the Rye Lane Conservation area, and I ask you to take this matter seriously. It has also been suggested in your proposals that the area is used for retail spaces. I am very much opposed to this proposal. The Peckham Rye area is surrounded by two main shopping areas, one of which (Bellenden Road) is quite small and contained, but the other one (Rye Lane and Peckham High Street) is very much developed and already constitutes the retail centre of the area. Why you would deem it necessary to add onto the Rye Lane market area a secondary space within the Choumert Car Park is a mystery to me; it would affect negatively businesses on Rye Lane, and I cannot think of anything that is lacking on the existing market district that your proposal would accommodate. Rye Lane and the High Street are filled with bakeries, butchers, grocery shops, pharmacies, hair-dressers, nail salons, specialist shops, bicycle shops and anything else you can imagine. Building more retail spaces at the Choumert Car Park area would directly impact on the residential character of our neighbourhood and will dramatically increase noise levels and footfall. More shops in this new proposed retail space would not be in the benefit of neither the existing retailers on Rye Lane, nor the residents of our neighbourhood. Finally, there is a very good recycling facility at one end of the Car Park, used by Choumert Grove, Chadwick Road and the surrounding areas. It is very convenient and I hope that whatever is finally decided for the Car Park you will incorporate it in your plans and retain it. Thank you for your time and consideration</p>	<p>Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.</p>
21	505	5.2-Stes for major development;		7	<p>Bellenden Car Park A much better use of the space would be to have a public green area and play facilities for all to keep the natural light that is in the street and the area.</p>	<p>The owners of the site have no current plans for redevelopment so the site will continue to be used for retail, however we have retained the site in the AAP and have amended the land uses that we would require there in case it comes forward in the future.</p>
22	506	5.2-Stes for major development;		14	<p>Choumert Road Car Park I want to express my concern fre-4 story building planned for the Choumert Car Park. I am a local (I own 7 Nutbrook St, SE15 4JU) and want to see Peckham Rye continue to regenerate and become an even better area than it already is now. However, I don't feel squeezing in more buildings/housing and people is not the right direction especially in this area. If Peckham Rye is going to try and regenerate Rye Lane with the station on it's way to becoming a nice centre point of the area then we need to continue to create other areas where we create a community feeling such as a green area something that is lacking around Rye Lane. It could be set up so it becomes a market area like Spitalfields, Columbia Rd, Brixton etc either full time or on weekends. Peckham is known for it's creative community so why no use it to encourage and grow this side of our community. I think Choumert Car Park, if it can't stay as it is, has better opportunities available that will positively impact all of the community rather than developers cramming in more people and taking away space which would bring the people together.</p>	<p>Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and</p>

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						protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
23	507	5.2-Stes for major development;		14	<p>FUTURE OF THE CHOUMERT CAR PARK SITE With the recent events in Peckham where youths disrespected local commercial spaces and the public high street, I think we need to strongly object to any denser developments in the area and in particular on the Choumert car park plot. This is the opportunity to the council to kick start the new Rye Lane Conservation area setting the standards that all Conservation Areas should receive. Central Peckham is in desperate need of the community to engage more with the local amenities. The proximity of the station makes a nearby car park less interesting and contradicts Southwark Council policy to push local residents to use alternative means of transport. This plot of land could be the Peace Park that most of the neighbourhood would like to see there. Rye Lane has the buzz of a high street but should also offer in its backyards a quieter, tranquil public space where kids, families could own their bit of Peckham. With a unique creative local force, Artists would be welcomed to display their recent productions and/or would participate in the design of the open green space. Following the footsteps of the Peckham experiment in the 1950's, vegetable patches would promote sustainable source of food production. Solar powered water fountains could demonstrate how playful and positive it can be to harvest rainwater. Lastly, the recent developments that have happened along Rye Lane have prove this point: if we carry on leaving open doors to uncontrolled, low-quality architecture, the future of Peckham centre looks bleak and will not attract the young families and professionals that seem to be interested in moving to this beautiful Conservation Area</p>	<p>Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.</p>
24	507		Policy 18		<p>Comment on the Peckham and Nunhead Area Action Plan Towards a preferred option: 1. There is no mention of the very negatively perceived traffic management in connection with Bellenden road. This must be part of the project and improvements for the future and numerous issues have been raised in the past few years</p>	<p>Reviewing the operation of the two one-way systems around Bellenden Road has been identified as a priority and has funding committed to the project. This is set out in the West Peckham Character Area, Section 5.4. This followed transport modelling work that considered the traffic impacts of the development proposed in the AAP. We will continue to monitor the operation of the road network and determine new priorities for improvement, in conjunction with the local community, over the lifetime of the PNAAP.</p>
25	507	5.2-Stes for major development;		14	<p>Choumert Grove Car park: Seize the opportunity to create an open and green piece of land that belongs to the public to enhance the Conservation Area. We need to attract families to the centre of Peckham but also pursue the leafy character of Bellenden road.</p>	<p>Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.</p>
26	508	5.2-Stes for major development;		14	<p>Choumert Road I would like to continue to use the choumert grove carpark to shop in Peckham The lack of carparking space does and will affect peoples interest in coming to support local businesses by shopping in Peckham We feel the carpark is a valid local resource, and the council should be assisting people to come into the local area, and spend their money with local traders</p>	<p>Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of</p>

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						Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
27	509	5.2-Stes for major development;		14	Choumert Road car park I wish to object to the proposed plan to convert the Choumert Road car park into housing blocks. The construction of new, dense, housing blocks in an already built-up area would be unsightly and a terrible waste of an opportunity to use the car park to create something that the community genuinely needs. I would strongly support alternative plans to convert the car park into a green space, perhaps including a children's play area, that would be a real asset for the local community and provide a space that harmoniously blends with the Rye Lane and Holly Grove conservation areas. I urge you to show some real vision in considering how to best use the site for the benefit of the local area and the Peckham community rather than simply building more housing blocks.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
28	510	5.2-Stes for major development;		14	Choumert Grove Car Park We live at 5 quantock mews which us adjacent to the choumert grove car park. We strongly object to the council's proposal to build four storey housing units for the following reasons: 1. The buildings will block our light. Our ground floor consists of one open plan living room which is dependent on light coming in from the floor to ceiling wall to wall glass doors at the back of the house facing the car park. The proposed buildings will block out the light from our main living quarters and will render our small gardens useless. 2. The buildings will impede our privacy as they directly overlook us. 3. We are concerned that closing the area off will pose a risk to the security of our property. 4. 30 housing units will create too much noise. We already suffer from noise pollution from the flats on Blenheim grove on the far side of the car park and with 30 additional units in the car park itself this noise pollution will only get worse. For these reasons we believe that the council's proposals will be detrimental to the enjoyment and use of our home and also greatly devalue our property as no one will want to live in the shadows of such a large and intrusive development. Instead, we support the community petition for the car park to be turned into a park for the whole community to use and enjoy. Like many residents in the Peckham rye area we have children but a very small garden and would welcome the creation of a safe area for children to play in and an open space for adults to enjoy. We believe that there is enough housing being built in the area and this creates a need for green open spaces for which the choumert grove car park is the ideal site.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
29	511	5.2-Stes for major development;		14	Choumert Grove Car Park I am writing regarding the future of the Choumert Grove car park. I would very much like to see the carpark used, at least in part, to serve the needs of the local residents for a safe, green space in the local area. There is a strong sense of community in this part of Peckham, but without communal spaces to enjoy together, our community is vulnerable to the kind of behaviour we saw during the recent riots. I am 23, and understand very directly the need for affordable housing, particularly for first time buyers. But housing is not just about a secure building to live in - it is about building homes for people in places where local support networks and amenities are available, in an environment which is conducive to health, happiness, sustainability and community. I implore you not to build houses without creating too a neighbourhood which people can	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years.

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					call home. I therefore strongly support the campaign launched by local residents to implore you to develop at least half of the Choumert Grove car park into a green space	We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
30	512	5.2-Stes for major development;		15	<p>I was horrified to see in your detailed Peckham and Nunhead AAP - towards a preferred option - the plans submitted for consultation about both Site 15, previously the Nunhead Community Centre site, and Site 16, previously the Nunhead Early Years Centre.</p> <p>Concerning Site 15, there is no mention of the 13-15 mature trees currently on that site, in the area designated on your proposed plans as 'private amenity opportunities'. I suggest you visit this area yourselves before closing this consultation. You will then see that the surrounding 2 blocks, Citron Terrace and Basswood Close are 2 storey blocks and therefore I would propose that any new blocks were built to the same height, especially as the new Linden Grove properties bordering the same area are also 2 storey houses. 4 storey buildings in that close vicinity would clearly obstruct most of the light from both the existing blocks of flats, but particularly from the Citron Terrace flats, whose main rooms face the old Community Centre, with only kitchen and bathrooms facing onto Nunhead Lane. For Basswood Close it is the kitchen and bathrooms that will face the new blocks, their main rooms facing onto Linden Grove. Nunhead Housing Site: You should note that Basswood Close is the name of the second existing block facing along Linden Grove with access along the side of the leafy green area in front of the old Community centre. The road shown in your plans on page 125 as Basswood Close is I believe Candle Grove, part of the 'new' Linden Grove 2 storey developments. There is one higher block further up Linden Grove, but sufficiently well placed not to obstruct anyone's light or views or appear as an eyesore. Just to remind you again that there are a number of very healthy trees in the green area in front of the old Community Centre. Could you explain what the phrase 'Reinstate the existing streetscape along Nunhead Lane' means exactly? There are 6 front gardens, a number of which are lovingly well tendered, inside the gates to the Citron Terrace flats there, paths to access each pair of flats and refuse facilities for each pair of flats.. Also again a number of very healthy trees bordering alongside these flats. The only extreme downside to the frontage of these flats is the sharp bend in the road near the neighbouring shops, that too often has been taken at great speed, resulting in the demolition of our walls, gates, and gardens in the space of an extremely scary few seconds. Over the past 9 years that I have lived in these flats I have experienced 6 such accidents in close proximity to my flat, 3 of those accidents actually demolishing the wall of the flat I live in. To summarise for proposed Site 15 - as far as your plans are concerned with regard to this particular area of the old Community centre, I would ask that you re-visit with regard to the trees existing in the 'grounds' of the old Community centre, and that you seriously downsize the blocks of flats you intend to build to 2 storey blocks, at least in keeping with these older existing blocks and with the newer Linden Grove housing. 3 storeys may be fine for the corner development only, near to the old entrance to the Community centre, where it may be more in keeping with the height of the neighbouring shops and will not interfere with any light accessibility to current properties. I would also ask that you consider parking, particularly as there are absolutely no parking facilities in Nunhead currently, except in front of existing residential housing, in the side streets - also whether the current school facilities will cope.</p>	<p>The diagrams and site description for these sites (now PNAAP 11 and 12) have been amended to remove the indicative blocks and to reduce the number of storeys - to 2-3 on site 11 and 2-4 on site 12. The site description also includes reference to the mature trees on site 12, specifically the willow tree and its root protection zone. Any new development in the area will have to comply with our policy on parking in the AAP (Policy 15). The council's property team are still working on the proposals for site 12 and will carry out further consultation in the local area before a planning application is submitted in summer 2012.</p>
31	512	5.2-Stes for major development;		16	<p>Nunhead Community Centre My comments about your plans for the site of the former Early Years Centre, site 16 - similarly in very close proximity to my home - I would ask that you really do as the plan states and create a new landmark on the corner of Nunhead Green – i.e not with a 5 storey block of flats obscuring all view and light from those shops opposite, who possibly also have no idea of these plans as they were not leafletted anywhere in this vicinity. The plan to build a 2 storey new Community Centre behind the 5 storey block - I assume that is what the 2 storey block is?? - appears crazy, it will be totally</p>	<p>The former early years centre is now PNAAP site 12. The site specific guidance has been amended to reflect the surrounding areas and now explains that the site is only suitable for 2-4 storeys. The diagram has also been amended to remove the indicative blocks. The mature trees have also been identified on the diagram and details of the root protection zone of the willow tree have also been added. The council's property team are still working on the proposals for the site and will carry out further consultation in the local area before a planning</p>

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					obscured and is supposed to be 'the heart of Nunhead'. This just is not feasible even if you were to place the 5 storey block behind the Centre, you would encourage comments disputing that also, obscuring light and trade from the Nuns Head public house. 5 storey blocks and even 3 or 4 storeys are not in keeping with this area and I think you seriously need to reconsider where you are placing these high blocks, as they are not wanted or suitable for the area as you have proposed them. And please bear in mind that the site of the old Early Year Centre has at last been given over to build new Community facilities, sadly completely lacking in this area of Nunhead, that should now be your priority and does not need to be obscured by any flats built in front of the Centre. Immediately behind the centre should be the green play and rest area, again that should not be overlooked by flats There is the large site further down Gordon Road Site 18 which is the suitable housing area and should be brought forward in the plans for redevelopment now, as it is an eyesore as it is. Flats on the early Learning site, Site 16, should be kept to the block at the other side of the mature willow tree and limited to 2 storeys in keeping with the face of Nunhead Green and Nunhead Lane, currently marked as 3 storeys, that would be the maximum possibility - and not in front of the new Community centre. I am glad at last to have had the chance to submit these comments - with feeling as I live in the midst of all this - and would value your response. We have had no leafletting about these plans at any time here and I am currently trying to do that.	application is submitted in summer 2012.
32	513	5.2-Stes for major develop ment;		14	I live in the part of Chadwick Road between the Choumert Grove car park and Bellenden Road. This is a very narrow one-way street that has a lot of traffic (including the P13 bus) going down it that has no choice but to go down it, as all 3 roads, including traffic coming out of the Choumert Grove car park, lead into Chadwick Road at the top. It is busy enough and often the P13 can barely get down the road. The traffic backs up horrendously at times when vehicles have to wait to turn left into Bellenden Road or go straight across it - it is a very dangerous junction, as the Council is already aware. I am very concerned that the Council's proposed development of housing units in the Choumert Grove car park will add exponentially to the traffic that has to come down Chadwick Road - not only while the housing units are being built but also when they are populated. The car park is needed for local traders but if it must go, I would prefer a green or open space for use by the local community instead.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
33	514	5.2-Stes for major develop ment;		14	I am writing to advise you of my recommendations for the future use of the Choumert Car Park site. As a local resident I love the fact that our neighbourhood is a great place to meet and interact with other people. The thriving local businesses on Peckham High Street, Choumert Road and Bellenden Road provide a great focal point for this but I feel the area would benefit from a local playground and open space. Shops and services around Peckham High Street and Bellenden need an outlet for kids to socialise and exercise. Yes we have Peckham Rye as a great open space but this is further away and does not cater for a quick ½ hour playtime between parents visiting the shops and other services in the area. Providing a green space and playground for kids to play and express themselves in is vital to their development, health and social skills. Putting these positive environments in and around the communities day to day living and service areas makes for a more enjoyable and sociable environment. The popularity of the developments at Goose Green Playground is there as evidence of how well a good open space for kids that is near the schools, shops and other services really brings local people together in a positive way. Given the recent events in our area I think we really need to ensure that future generations have the correct environment to grow up in. Yes there is a demand for housing and there always will be as more people want to live and work in the thriving area but we need to provide local people with the right amenities to create a diverse, progressive, healthy and happy society. Using these spaces in the correct way today will create a better tomorrow.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.

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34	515	5.2-Stes for major develop ment;		14	I would like to register my strong objection to the proposed redevelopment of the Choumert Grove Car Park site, listed on pp122-123 of the PNAAP (http://www.southwark.gov.uk/download/5919/peckham_and_nunhead_area_action_plan_towards_a_preferred_option). The car park is on the edge of the Holly Grove Conservation Area and in the proposed Rye Lane Conservation Area. The option to build 30 housing units in four-storey blocks is wholly inappropriate for this location. This would be out of keeping with the existing architecture of the area, raise housing density in an area that is all ready heavily built up and densely populated, and negatively impact the neighbourhood character of an established residential area.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
35	516		Policy 32		Its incredibly important that as much as possible of Peckham be give Conservation Area status. Having worked in urban regeneration projects in London and Havana I have witnessed at first hand the enormous benefits that invariable follow such classification, particularly in improving the quality of town centres and of inhabitants' daily life	The Rye Lane Peckham and Peckham Hill Street Conservation Areas were adopted on 18 October 2011.
36	516	5.2-Stes for major develop ment;		14	Please could consideration also be given to the creation of a Peace Garden on the site of the Choumert Road Car Park. Provision of green spaces around Chadwick Road and Choumert Road/Grove is inadequate and this site, equidistant between a Mosque and a Church, would be an ideal place to provide an open green space for the enjoyment of the whole community, particularly of children, for whom play facilities in the area are a few and far between. At present the car park is only sporadically used, and I often see boys playing cricket in it when it is empty - how wonderful it would be if they could have a proper pitch on which to play. The site is big enough for a sports space and Community Garden.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
37	516		Policy 18		Even better would be if, in addition to the above, traffic were redirected away from Chadwick Road, currently a rat-run for cars, and the area around the intersection of Chadwick Road and Choumert Grove were pedestrianised all the way to Peckham Rye Station, so as to make a beautifully extended Community Hub	The current priority is to review the operation of the two one-way systems around Bellenden Road. This is set out in the West Peckham Character Area, Section 5.4. This followed transport modelling work that considered the traffic impacts of the development proposed in the AAP. We will continue to monitor the operation of the road network and determine new priorities for improvement, in conjunction with the local community, over the lifetime of the PNAAP.
38	517	5.2-Stes for major develop ment;		15	I am writing to comment on the draft proposal for the regeneration of various sites in and around Peckham and Nunhead, in particular the site currently occupied by the Nunhead Community Centre (as illustrated by Figure 42 in your consultation document) I must begin by proclaiming an interest in the proposal as I have lived adjacent to the site for 23 years. Figure 42 suggests vehicular access onto the site at a particularly dangerous point in the road. Perhaps your Highways Department might want to comment on the wisdom of such a location. Figure 42 continues to illustrate a building to the east of the site which hasn't been in existence for at least 25 years. Google maps and Ordinance Survey often mistake an abandoned shipping container on a disused lot for what was once a small slaughterhouse. Once removed from the plans the true relationship between your proposal and the adjoining properties might be better understood. I live at 6 Nunhead Grove. Figure 42 suggests a height to the new development of four floors. Given that the adjoining	The diagram and description for the PNAAP site 11 (previously site 15) have been amended to reduce the height to 2-3 storeys and to remove the indicative blocks. We have also amended the location of the vehicle access from Nunhead Lane to Basswood Close. Any development that comes forward on this site will have to comply with the design and heritage policies with the Core Strategy and the AAP on design and heritage as well as taking into account the Nunhead Conservation Area Statement. The text for this site also specifies that development should be in keeping with the surrounding buildings

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					properties along the Lane do not exceed 3 floors and my house is only 2 stories high I would suggest that any such density could both contradict the principles of the Nunhead Conservation Area and prove to have a detrimental effect on my home. I understand that this draft proposal is very preliminary and would welcome the chance to comment further should the scheme develop further.	
39	518	Other			Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	Noted.
40	519		Policy 15		I would like to note that in the Action Plan above on page 68 which shows cycle routes, a very popular cycle route is through the 'Peckham Quiet Route' or open space OS98. This is used by many people who cycle to the City. I also note that this area will be designated a SINC. I hope that this route will still be encouraged as a cycle route as it provides a pleasant route away from heavy traffic. It would be helpful if it could be designated on the Map Fig 19 as a cycle route	We are committed to working with our partners to create an environment that is more cycle-friendly throughout Peckham and Nunhead. We no longer intend to highlight individual cycle routes in the AAP and instead set out our broad priorities in policy 11, in accordance with the council's Transport Plan. This includes improving routes between Peckham town centre, Nunhead local centre and the stations. More local issues are detailed in Section 5, which focuses on the different character areas within Peckham and Nunhead.
41	520	3.3.1- Peckham town centre			Just a quick comment: I'm sure this will be nothing new to you, but I feel I have to say something. On bank holiday Monday morning (yesterday), at about 7am, I walked down Rye Lane, from Peckham Rye to the station. The street was more or less empty, which somehow seemed to highlight the appalling state it is in: the hideous, rickety shop fronts, the wilful obscuring of the original buildings, and of course the rubbish: the rolling tides of waste matter of all kinds, from empty packaging to chicken bones to wet fronds of human hair clinging to pavements and lampposts. I know you can't teach people to be more respectful of their environment, but is there really nothing at all that can be done to improve the situation?	The vision for Peckham town centre in section 3 and the policies in section 4 particularly on the town centre, public realm and conservation should address some of these issues.
42	137		Policy 15		Just a few more comments about the AAP in terms of the public realm from one of our members who lives in Nunhead. Figure 19 and 20 seem to be where they are showing improved walking and cycling connections: There don't seem to be many differences between the "now" and proposed plans – except for the opening up of the blockages around Rye Lane and Morrisons. Consort Road and Heaton Road are shown as secondary pedestrian routes – they aren't nice ones now (narrow pavements, lots of traffic) but maybe getting shown as pedestrian routes could help in the future? Figure 35 – no mention of encouraging people to walk through the Atwell Estate Figure 20 – no mention of the Canal Path as a walking/cycling route Figure 42 (p125) It would be good to re-instate the path down the side of the ex-Nunhead Community Centre through to Basswood Close/Linden Grove (shown as green metal boarding in the photo) allowing people to avoid the very narrow pavement on Nunhead Lane. We would really support the one that aims to open up Bull Yard and create a link through to the Aylesham site. This appears on my presentation that I sent you but obviously is TfL controlled so again needs to be thrown into the mix we were talking about. Hopefully I will see Councillor Colley this evening so I will try to mention the A202 route and its significance to her then	We are committed to working with our partners and using development as an opportunity to create an environment that is more pedestrian-friendly throughout Peckham and Nunhead. We no longer intend to highlight individual routes in the AAP and instead set out our broad priorities in policy 11, in accordance with the council's Transport Plan. More local issues are detailed in Section 5, which focuses on the different character areas. The opportunities to improve the public realm and pedestrian links to the east of Rye Lane are referred to in Section 5 in policies relating to Peckham core action area. Policy 11 focuses on prioritising improvements to links between key destinations such as Peckham town centre, Nunhead local centre, stations and schools. Major developments will also provide opportunities to improve the surrounding public realm. Further reference to this is made in the site specific guidance in the AAP where appropriate. The A202 will also be the route for one of the Mayor's cycle superhighways, which is scheduled for completion by 2015.
43	149	3.3.1- Peckham town centre	Policy 1	4	Policy 1 Peckham town centre I agree option 2 (which includes Option 1) - developing a new retail quarter around Peckham Rye station & Copeland Road industrial park in addition to the High St/ North Rye Lane area. Option 1 mentions the development of the Netto's site: this development should exclude any recurrence of the car parking and traffic issues caused by the current shop car park there. This ruins the neighbouring streets with the traffic issues, and is just not sensible to make the car park share the only western exit off Rye Lane and through a street market. The kind of retail development there needs to be subject to much more detailed consultation before tying down in the PNAAP	Support noted. We have set out in our Preferred Options policy 1 that we will promote the majority of additional retail floorspace on the larger town centre sites which include Aylesham Shopping Centre (PNAAP 1); Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6) and Land between the railway arches (PNAAP 3). Appendix B of the Preferred Options sets out the former Netto (now Asda) store (PNAAP 22) could have potential for an additional floor of development to improve the street frontage which could include a mix of uses to include retail on the ground floor and possible business or housing use above. We have addressed car parking provision in our Preferred Options policy 14 and we state that in assessing car parking on development sites we will determine the level of on-site car parking on a site-by-site basis, with reference to the car parking standards in the saved Southwark Plan and the forthcoming

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						development management development plan document
44	149		Policy 2		Policy 2 Culture, tourism, evening economy. I agree option 2 (including option 1) – ie additionally promoting a cluster around Peckham Rye station and the Copeland Industrial Park This section figure 15 shows the town centre with a focus of two circles –the northern gateway and the central gateway. I suggest you include a smaller circle showing the southern gateway to the town centre and link that to the focus in this section on improving the shopping environment in the southern end of Rye Lane. The three circles also match the three cores of the proposed THI.	Support noted. We have removed Figure 15 from the draft AAP. Instead, we have set out in our Preferred Options Policy 1 that we will promote the majority of additional retail floorspace on the larger town centre development opportunity sites which include Aylesham Shopping Centre (PNAAP 1); Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6) and Land between the railway arches (PNAAP 3) and we will also promote and maintain a vibrant balance of uses along either side of Rye Lane and Peckham High Street to help strengthen the shopping environment.
45	149		Policy 4		Policy 4 Space above shops I agree with this Preferred Option to allow flexible uses for residential, retail, business & community uses above the shops, provided it is qualified to include restraints on the numbers of religious uses above the shops to maintain an appropriate town centre balance of uses. The same restraint should apply to the ground floor uses as well	Support noted. Our preferred approach set out in Policy 1 is to support proposals which bring vacant upper floors above ground floor shop units in Peckham town centre back into use. To ensure there is a balanced mix of uses in the town centre we have set out a number of criteria which will ensure the proposed use is acceptable and increases the vitality of the town centre.
46	149		Policy 5		Policy 5. Markets My view on this Preferred Option to establish a new site for markets is that it all depends on where the site is, so I can't support it without knowing that. I am opposed to a usual street market in the newly to be established town square, if that is what is being suggested.	We have set out in our Preferred Option Policy 5 general support for new markets and street trading areas in Peckham town centre to help add to and increase the variety of retail offer. We have not identified a preferred site for a new market, however have identified the land to the rear of Peckham Rye station could be a possible location for further consideration
47	149		Policy 6		Policy 6 Local shopping centre, parades etc I agree with this Preferred option to protect existing shopping parades. In the case of Bellenden shopping parade, mentioned in the report, can we also have an encouragement of independent shops providing a minimum of daily local necessities as well as other shops and restaurants.	Support noted. We have set out in Policy 35 of the Preferred Options (Section 5: Character Area policies) that we will maintain the status of the Bellenden Road protected shopping frontage by supporting the provision of a mix of uses including small scale shops, cafes and restaurants
48	149		Policy 8		Policy 8 Business spaces I prefer Option 2 expanding the business space. When the station square is restored and the other planned improvements around there are made, this could become a destination for medium and small businesses needing to be near the centre of London because of the potentially very good rail facilities if they are improved in regularity and frequency, and marketed effectively, which at the moment they are not. So the Council's support and pressure for improvement of these aspects of rail travel from Peckham Rye station should be an important part of the PNAAP travel policy	We have set out in our Preferred Options Policy 6 that we will support the provision of new business floorspace in Peckham town centre. We set out the new development should support business start-ups and growing SMEs through the provision of flexible space, suitable for a range of business types and sizes. We have identified development opportunity sites where there could be more or improved business space, including Peckham Rye Station (PNAAP 6).
49	149	Other			New Policy? Public Realm The quality of the public realm is critical to the success of the town centre as a shopping and visitor environment and for businesses to thrive. But its quality now and for many years has been so very poor. Is it not mentioned in this PNAAP because it is not a land use policy? And yet it seems to keep being relegated to being dealt with by the Council's long term planning policy unit, and so delayed until 2013! with no joined up management now. I know that is not the intention but it is what seems to happen. We are told when we refer current day to day issues to the Council that it is switched to the PNAAP team when it needs to be addressed now by other day to day management teams. Is it possible to get a small section in the PNAAP describing the important role that the public realm and its quality and otherwise has for the success of the town centre economically and socially, and say what the Council is doing now to stimulate really effective joined up working on this, and how that supports the policies in Theme 1? May I suggest that this short section could usefully bring together the policies that ARE in the PNAAP which will help in this regard – like the heritage, and design policies? Show us how they are all connected up in a linked together policy for public realm. That would really help to get 'Peckham Now' moving alongside the important 'Peckham Future'.	There is a policy on public realm in the Preferred Option document - policy 23. Section 5 also sets out detailed policies for each character area, including the town centre.
50	149		Policy 9		Policy 9 Open Spaces I agree with the option to provide open space. But please amend your map titles of MOL in the fact box on page 60 (and any other lists in the PNAAP or the Council) so that OS 124 reads Peckham Rye Park & Peckham Rye Common. Already this inaccurate information in the draft PNAAP, naming Peckham Rye Common as Peckham Rye Park, has led to mistakes in development control reports. This was where the author	This has been amended in the Preferred Option Peckham and Nunhead Area Action Plan.

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					of those reports said he obtained his information. Can the map show eg by a dotted line where the boundary between the two is? Also the grass strip along the border of Peckham Rye West road just south of Piedmont Green is also part of the historic Rye Common and protected as Common land. That part is missing from the green space on the map in Figure 17. You can get the exact boundary from the map attached to the affidavit of the handover of the land to Southwark Council in 1966	
51	149		Policy 10		Policy 10 Community facilities I don't disagree with a policy of encouraging increased community facilities in the action area core, but not if it excludes well justified community facilities being located outside that core. I agree with the policy that providing for London's diverse faith communities needs to be addressed regionally. How can Southwark encourage that to be done effectively? Also agree where possible that faith groups should be encouraged to share faith facilities as many churches now do. I would hope also that the Council's policies would encourage faith groups to open their buildings to wider community use too just as schools are being encouraged to do and as some churches now do – like the Copleston Centre and the Goose Green Centre	Within Southwark our approach is to encourage different community groups including those of different faiths to share facilities to make the most effective possible use of opportunities. Sharing spaces and facilities makes them more convenient for the public to visit and helps make them become more viable. This will make sure that everyone in Peckham and Nunhead has access to community facilities that meet their needs. This includes looking at wider community facilities such as libraries, sports centres, community halls, court facilities, places of worship, employment and training facilities, community space and children's play areas. Providing for London's diverse faith communities needs to be addressed regionally. Southwark liaises with other local authorities and also the GLA to discuss faith communities' needs. We have set out in Preferred Option Policy 7 that where there is a particular need for facilities outside Peckham core action area they should be provided in accessible locations.
52	149		Policy 12		Policy 12 Young people Can the policy also say it will seek out additional ways of involving young people in defining need and not just in the established Council institutions of Youth Council and community councils; important as they are, they probably don't cover some key sections of youth culture.	The Partnership Working section of the Preferred Options in section 7 identifies that we will continue to engage with local people and community groups to ensure the AAP and ensure that future development meets the needs of local people and groups through consultation and provision of infrastructure. This will include consulting with young people through forums such as 'Speaker box and youth community council. As set out in the consultation report we wrote to local schools as part of the consultation on the 'Towards a preferred option', and attended a lesson at one school to discuss the draft AAP. The feedback obtained is provided in this report and has helped shape the Preferred Options.
53	149		Policy14		Policy 14 Leisure & Sports facilities I agree we need to maximise the use of facilities where this is consistent with their good maintenance. I suggest that something should be included in the policy to ensure that it is clear what steps can be taken to prevent facilities from being overused. This is now the case for Peckham Rye Park, and Rye Common where at times the pitches and ground become waterlogged or cracked because of over use. With the advent of a second secondary school on its boundary advertising itself as a sports major it is most unfortunate that the Council has not yet got a clear publicised planning policy about protecting the condition of Peckham Rye Park and Common from overuse	Policy 10 sets out the AAP approach to sports facilities. We have also carried out an Open Spaces Strategy, which we are consulting on alongside the AAP.
54	149	Other			Please add a policy - Local food growing on empty sites I cannot see where else to make this comment – please can the PNAAP include something somewhere to facilitate a process, on all small and larger ground that is likely to remain vacant for at least two growing seasons, for the growing of food by local residents. If the Council would include this in the PNAAP, as a possible use, local residents could work with the Council to develop a scheme at minimal cost where this could happen.	Policy 19 on Open spaces refers to opportunities for food growing.
55	149		Policy 16		Policy 16 Public Transport I agree with the preferred option of facilitating a highly accessible public transport network including the rail services from Peckham Rye station. Can this policy pinpoint two practical transport issues to be addressed as a priority to achieve significant improvements: * a commitment to working towards regular and frequent services on the rail services from Peckham Rye into central London tube stations as this will be a significant way of achieving the accessible public transport network. See also my comments on Policy 8 for business spaces around the station. This would support TfL's policy for Greater London's rail services. * new bus services between Peckham town centre and central London serving the most deprived transport area of east Camberwell and the Aylesbury area	Support noted. We will work with TfL and transport operators to promote improvements to public transport in Peckham and Nunhead, but the operation of individual routes and services is too detailed an issue for the AAP.

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56	149		Policy 17		Policy 17 Safeguarding Flaxyard site I have no preference between these two options as they affect residents in that neighbourhood so closely that they should have a significant voice. But whatever is chosen, especially if for safeguarding for a longer term transport terminus, please develop a policy to enable it to be used pro-actively for interim community activities such as food growing, and amenity spaces.	The Flaxyard site is proposed as a development site as set out in appendix B under site PNAAP 9. However, at present the site is open, rather than fenced, so that views across the site remain and people can walk across it.
57	149		Policy 18		Policy 18 Road network Please include in the list of improvements, in what is a 15 year long PNAAP policy, improvements to the current unpleasant, for residents and pedestrians, whole traffic and pedestrian system to the west of Rye Lane. The final bullet point in this list about improving the southern end of Rye Lane to reduce vehicle speeds and to improve access to Peckham Rye Park – this should be corrected to Peckham Rye Common, as Peckham Rye Park is some half mile away south of East Dulwich Rd. a	Key road network improvements are now set out for the individual character areas in Section 5. The projects referred to here have been developed as a result of transport modelling work that considered the potential traffic impacts of the development proposed through the AAP. For Peckham West this includes reviewing the two one-way systems in the Bellenden area and reviewing access to Rye Lane. They are our current priorities and have committed funding to deliver them. Further improvements may be delivered through s106 funding or through other external funding. We will continue to monitor the operation of the road network and determine new priorities for improvement, in conjunction with the local community, over the lifetime of the PNAAP. References to Peckham Rye Park and Peckham Rye Common have been addressed
58	149	5.2-Stes for major development;	Policy 19	14	Policy 19 town centre car parking I failed at first to understand the choices here between these three options, until I discovered that the Questionnaire does not have the same Qs as the PNAAP. On the basis of the options described in the report and not the Q, I would choose a partial combination of them. Not opposed in principle to a new site for a car park – but depends on where it is and what effects it would have on traffic flow and noise. Some existing car parks may be suitable for development – but not the Choumert car park which should be either a car park or an Open Space/Park amenity space. If there has to be any development it should be not more than 2 stories to fit into the Holly Grove Conservation Area, and it should retain the current open vistas from Choumert Grove which are so important there, and create a significant amount of public open amenity space. I would like to see thoroughly explored the potential renovation of the multi storey car park for a new use leaving the first floors providing about 20% of car parking space as we are told is now in use.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. Further guidance for the redevelopment of these sites is set out in appendix B under sites PNAAP2 and PNNAP7. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. No new car park sites have been specifically identified at this stage. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
59	149		Policy 20		Policy 20 Residential car parking I agree option 1 for car free development in the core action area. Can the PNAAP say something about a review of CPZ areas so that there is an incentive and understood process for them to be adjusted where in practise they don't work well because of changed conditions or experience? Can the policy be that there will not be any more CPZ extensions in the PNAAP area except where specially requested by a large proportion of the local residents in the area affected?	Our preferred approach is to encourage car free residential development in Peckham core action area, but to allow schemes to include up to 0.3 spaces per unit where this level of parking can be justified through a transport assessment. As exceptions to this rule, we will allow disabled car parking and car club spaces to be provided. This is set out in policy 15. No further Controlled Parking Zones (CPZ) or extensions to existing CPZs are proposed through the AAP. Any future changes to CPZs in Peckham and Nunhead would be subject to separate consultation with the local community.
60	149		Policy 21		Policy 21 Providing new homes I am concerned at the proposal to increase housing by as many as 2000 across SE15 and concentrate 1500 of them in the town centre area. Coupled with the need for them to cater for family homes this is a significant increase in the pressure on services, and also increases the sheer density of people. Peckham town centre is already feeling so crowded. Can bringing floors above shops into residential use count towards these numbers?	The Core Strategy identifies Peckham and Nunhead as one of our growth areas. We also need to meet our housing targets set by the Mayor of London. The Core Area is the best location for a higher level of development as it has the best public transport accessibility, a large number of sites and the shops and facilities associated with one of the largest town centres in the borough. The Core Strategy implementation plan provides more details on how we will deliver new housing as well as the appropriate level of infrastructure. The AAP also has a section on implementation. The purpose of the AAP is to balance growth with the provision of infrastructure and facilities for people living and working in the area. All new homes will count towards our target, including homes that are created above shops.

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61	149		Policy 22		Policy 22 Density You say Peckham is 'predominantly urban' and Nunhead as predominately suburban. But my area of Peckham on the west side of Rye Lane is much like Nunhead and East Dulwich and could not be said to be predominately urban. How can we ensure that policies thought to be appropriate to 'urban' Peckham are not imposed on this part of 'suburban' Peckham? I am also concerned at the small and cramped rooms, and poor quality of new housing being provided recently. This seems to be a national problem of developers squeezing as much as they can for lowest cost, but please design these housing policies to make genuine improvements in new build. Poor and cramped housing is bound to increase social costs and problems in the future.	Our approach to density is set out in the adopted Core Strategy, including the map which figure 24 is taken from. The density ranges are quite broad and the density of new development will have to reflect the local area as well as the relevant policies in the AAP, the Core Strategy and the Saved Southwark Plan. Policy 3.11 of the Saved Southwark Plan sets out the factors that new development should adhere too, including local context. Development in Peckham and Nunhead will also have to meet the standards set out in our Residential Design Standards SPD even if they are at a higher density. The SPD covers size, amenity space, daylight etc. We have also added our minimum floorspace table to policy 18 of the AAP on the mix and design of new homes. We have also added policies to the AAP covering five character areas to ensure that the level of development is appropriate to the character of the area.
62	149		Policy 25		Policy 25 Family homes Yes we need more good family sized homes all over the PNAAP area.	Support noted.
63	149		Policy 28		Policy 28 Sites of importance for nature conservation Fig 25 (referred to as fig 18 in the Q) and the list of SINCS needs to be amended to show SO124 as Peckham Rye Park and Peckham Rye Common. Also there is a part of the Common missed off the fig 25 Piedmont Green and the stretch from there northwards to Harris School.	This is been amended in the preferred option Peckham and Nunhead AAP.
64	149		Policy 30		Policy 30 Design I agree strongly with the need to ensure high quality design in buildings. In the town centre we need a proactive policy on this and not just waiting for planning applications to come in. We need strong clear guidance on good design for town centre shop fronts and all property owners and traders informed about it and encouraged to call for advice if they are thinking of doing any changes to their properties before they do them. We need to develop a free initial advice service to ensure they get on to this track before it is too late. But we need some clear agreed guidance in simple to understand terms as soon as possible. This must not wait till 2013 and the approval of the PNAAP. It needs to start as soon as possible. Can the council set up an initial enquiry free advice service to help property owners get used to the ideas? We could explore community contributions e.g a scheme of local pro bono professional advice and if necessary raising small funds from appropriate funding schemes for town centre regeneration.	We endeavour to ensure the high quality design of buildings and spaces as set out in Policy 23: Public Realm and Policy 24: Built Form. Development will be required to meet the highest possible design standards, in line with Core Strategy strategic policy 12. The Council values the heritage of Peckham and is currently applying for funding from the Townscape Heritage Initiative programme that will help deliver building repairs and improved spaces within the conservation areas. This bid will unlock funding to highlight the value of heritage assets and invest in repairs and architectural reinstatement of historic and listed buildings, support and extend recent public realm works to the north of Rye Lane and complement the proposed investment in a new square in front of Peckham Rye Station. We have also submitted bids for the Mayor's Outer London Fund for improvements to public space at the eastern end of Elm Grove and Holly Grove. The Conservation Area Appraisals published alongside the recently adopted Rye Lane Peckham and Peckham Hill Street Conservation Areas provides clear, definitive advice on good quality design. We are looking to bolster this with specific design and repair details with the Townscape Heritage Initiative programme.
65	149	3.3.3-Peckham neighbourhoods	Policy 30		Policy 30 Design Peckham neighbourhoods It isn't clear from fig 26 what exactly is covered by 'Peckham neighbourhoods'. But I will make a comment here hoping it is the right place as it fit with the general content of this section. My own neighbourhood of Rye Lane West (all SE15 to the west of Rye Lane) has a clear constant character throughout the area with some minor exceptions which nevertheless add to its attractiveness, including the small infills in war damage. As a neighbourhood, having to respond to so many planning applications, we have over the years been accumulating experience of what works and doesn't work, and what is liked and not liked, and what needs to be improved. We are developing enough material to draft our own neighbourhood profile to bring this together so that it can be made available to the council and developers and anyone else with an interest in advance of any decisions being taken which affect our area. We were working on this as an informal document that we would like to discuss with the Council to get it in good shape. We would however now also like to discuss where such a document might fit in relation to the PNAAP and the new localism framework, perhaps as a micro SPD. I would like to suggest that such a process be included in the next stage of the PNAAP for consultation as a section setting out how such a process could work for any neighbourhood covered by the PNAAP. I would like to contribute to the discussion to ensure that my proposal is clear enough. If successful this process may be a	The Preferred option AAP includes five new character area visions setting out the character, opportunities and policies for each. The neighbourhood referred to comes under Section 5.4 Peckham South and the following policies have been prepared for the area specifically: Policy 35: Land uses Policy 36: Transport and movement Policy 37: Built Environment Policy 38: Natural Environment Figures 15 and 18 shows the boundaries of the character areas and Peckham South specifically. We have commissioned a characterisation study which has closely examined the make-up of the AAP area, its historic context and makes recommendations for future opportunities. This document will be published as part of the evidence base for the preferred option. AAP Policy 6 promotes the generation of new jobs and businesses in Peckham and Nunhead action area core, Peckham town centre and Nunhead local centre in line with the Core Strategy. Our Employment Land Review (ELR) (2010) has identified Peckham town centre and Nunhead local centre as demonstrating strong suitability to accommodate B1 uses for the needs of SMEs. We want to continue to protect business floorspace to maintain a mix of different uses in Peckham town centre, Peckham core action area and Nunhead local centre. The ELR looked at other cluster of employment we should protect and as a result we will protect the Print

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					useful process for any neighbourhood in the borough to consider for themselves under the Localism arrangements. It could be an excellent way of helping people to engage with their own neighbourhood with their neighbours and support them to come up with a useful neighbourhood profile. I would like to suggest an additional bullet point to the list of policies in this section on Peckham neighbourhoods: ie: Giving equal weight to the local value of light industrial back lands, and not assuming a priority for housing. Each case to be considered solely on its merits. We have lost too many excellent small backland industrial sites to squash more housing on. The Planning Department and Planning Committee seem to take as an absolute assumption that housing has preference unless anything explicitly stops that like an industrial protected zone. These micro backland sites can't have industrial zones but they need an equal starting point with the battle for housing.	Village on Chadwick Road within the Peckham South character area for employment uses. Any redevelopment of this site will require replacement of business space. This is set out in Policy 6 and Policy 35 - we will protect the Print Village on Chadwick Road for employment uses. Any redevelopment of this site will require replacement of business space.
66	149		Policy 31		Policy 31 Building heights I think that the map in fig 26 showing an ill defined grey blob for the area where tall buildings are permissible is much too large and too vague. Can it rather show the exact sites where they might be appropriate if the right design came along?	AAP Policy 25: Building heights sets out our approach to taller buildings in the action area. We have deleted figure 26 from the preferred option AAP. Appendix B and policy 25 set out that sites PNAAP 1, PNAAP 2, PNAAP 4, PNAAP 5, PNAAP 7 may be suitable for taller buildings. These sites are identified as the Aylesham Centre, the former Wooddene site, Copeland Road Industrial Park, Copeland Road car park and the Cinema and multi-storey car park site.
67	149		Policy 32		Policy 32 Heritage conservation I agree with this option. We really can get a lot of benefit for 21st century Peckham for making the most of our historic heritage.	Support noted
68	147		Policy 33		Policy 33 Locally listed buildings I agree with this option. I understand that there will be a separate consultation on the buildings to include in the list.	Noted. The preferred option AAP has identified buildings with local value by placing these buildings on a "Local List". These proposals are shown on figure 16 and are listed in appendix C of the AAP. Our design and conservation team will be consulting separately in Spring 2012 on further potential locally listed buildings across the whole of Southwark. We will update the list within the AAP at the next stage of consultation following consultation on the AAP and the local list.
69	149	5.2-Stes for major development;		2	Site 2 Cinema & storey car park The PNAAP says that the car park uses up to 20% for car parking. Before any decisions relegate this building to demolition I prefer to see full exploration of the possibility of refurbishment of the building for the new kinds of uses it has attracted through Bold Tendencies, but currently available only in the summer, with 20% reserved for car parking. It is said that such propositions may be available to the Council to be explored.	The AAP acknowledges that this is a key site in the town centre. The site guidance recognises that the site is not reaching its potential in terms of design or its use. Our car parking study recognises that this car park is currently under used. If the site is redeveloped, it could provide a significant opportunity in this part of the town centre by making better use of the space, providing range of new uses, improving its connection to Rye Lane, providing a new street frontage, raising the profile of the building on the high street.
70	149	5.2-Stes for major development;		3	Site 3 Land between rail lines east of Rye Lane. I support the use of this land for retail and business as part of the emerging new retail and cultural quarter in that part of Rye Lane. [The text on page 101 for this site appears to have been in error transposed from page 100.]	Support noted.
71	149	5.2-Stes for major development;		4	Site 4 Copeland Industrial park I support the proposed mixed use of this site. I suggest the PNAAP includes the possibility also for a small square off Rye Lane between 133 Rye Lane and the rail lines in place of two shallow fronted one storey buildings owned by Network Rail. This small square would open up the vistas at that part of Rye Lane, echoing the larger one in front of the station, and make the Bussey building and Copeland site much more accessible from Rye Lane without spoiling the intrigue of the passageway entrance.	Support noted. We will provide more detailed design guidance and description at the next stage.
72	149	5.2-Stes for major development;		6	Site 6 Peckham Rye station I agree with the general approach here. But whether there is scope for a 3 storey block behind the station needs to be considered in the context of an overall design, so too premature for this kind of detail.	The detail about a block behind the station has been removed.
73	149	5.2-Stes for major development;		7	Site 7 Bellenden Rd retail park inc Lidl site I agree with the idea of creating access from Rye Lane, though can't imagine its implementation!	Noted.

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74	149	5.2-Stes for major develop ment;		8	Site 8 Copeland Road Car Park I am concerned at the loss of this car park especially if there was a reduction in car parking behind Netto's which is the wrong place for a big car park. The frontage of this site 8 on Heaton Road needs substantial improvement in some way. I feel uncertain of the effect of a 6 storey building there. It might ruin the feeling of space there at the moment or be a good mark of the sudden transition from the vast space of Peckham Rye into the dense town centre	Policy 14 of the AAP sets out our approach to car parking in the town centre. We have carried out a car parking study for the area which identified that this site would not be needed, particularly as we are now maintaining the Choumert Grove site as a car park. This site provides a key opportunity to improve the appearance of the town centre as you approach it from the south. The importance of creating active street frontages along Rye Lane and Copeland Road is reflected in the AAP.
75	149	5.2-Stes for major develop ment;		11	Site 11 Flaxyards site (end Sumner Rd) I have no preference for either option. I do want the Council to make sure that it is well used in the interval before development of any kind both for growing food and for amenity space	Noted.
76	149	5.2-Stes for major develop ment;		14	Site 14 Choumert Car Park I prefer this site to be mainly Open Space and Amenity Park and not 4 storey housing. We need to keep the open vista of sky viewed from Choumert Grove as an important part of the neighbourhood character there and a welcome breathing space a step away from the dense town centre. If there has to be any development it should be not more than 2 stories to fit into the Holly Grove Conservation Area, and it should retain the current open vistas from Choumert Grove which are so important there, and create a significant amount of public open amenity space	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
77	149	5.3-Other develop ments		25	Site 25 Netto's Whatever happens to this site, the first issue to be sorted out is that it shouldn't have a main car park at its rear as it is just inaccessible from the town centre and through very narrow residential streets. If there is to be any large retail there where will the car parking be?	Further guidance on the Asda/Netto site is contained in appendix B, in which the site is included as PNAAP 22. This sets out that we would, in principle, support an additional storey if the site was redeveloped. On-site car parking arrangements would be determined in relation to the maximum standards contained in appendix 15 of the saved Southwark Plan and those in the London Plan. Access arrangements to any new development on the site would be subject to detailed discussion at the planning application stage. There is currently no planning application for the redevelopment of the Asda site. Should a planning application be received in the future, local residents would be notified as part of the formal planning process.
78	149	5.3-Other develop ments		27	Site 27 Land next to Coop House This empty site needs to be filled with a development that is sensitive to the terraces alongside it and opposite. The uses are fine.	Noted. Policies 24, 25 and 26 in the AAP on built form, building height and heritage will help to meet these concerns.
79	149	5.4-Potential housing sites			Potential housing sites Table 4 Why does this include APS Printing Village when it is valued as (comment in policy 8) industrial / employment land? Wouldn't it be better for it to remain industrial? We need these small industrial sites around the area, and as far as I know that one is not troublesome to the residential neighbourhood. It is part of a quite wide industrial area that is largely hidden from view along the railway lines on both sides. Is any of that protected as light industrial? Why not?	The Print Village has been removed as a possible housing site and its value as an employment site is set out in policy 6 and policy 35 in the Peckham South character area section in the Preferred Option document.
80	149	6-Deliverin g:workin g together to make			Working with our partners The work with the Southwark Alliance does not touch community networks or grassroots groups at all. We need to find a different way of engaging with them. May I suggest that for the next stage the Council arranges as part of its on going PNAAP consultation workshop meetings, a few specific ones for all those grassroots active residents who are taking an active interest in any part of the PNAAP to come together to share their information, ask their questions, get advice, and discuss	We will consider these suggestions for the next stage of consultation. We have also updated section 7 of the AAP to refer to the many different groups we work with.

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		it happen			overall themes about the PNAAP? (examples – the connections between car parks, housing, families and open space in the town centre; tall buildings in the town centre; the northern cluster of major development sites; the central cluster of development sites; housing and provision of services; the actual topics would be chosen by the participants; these are examples of interrelated aspects which could benefit from public discussion with a constant group of residents, provided dates arranged well in advance). This is what I and others have found missing that would be helpful – a chance to discuss with others at the same level as ourselves in the process what we think about some general themes cutting across a number of interests. This would be a complement to the Council's good work with the organised groups including the Southwark Alliance, but which does not reach this part of the 'community sector' at all. Without something like I am suggesting, I think there is a hole in the strategy for this important part of the 'community sector'. Having experienced the consultation process this summer, I think my suggestion is worth considering. I have a number of ideas about it I would like to discuss with officers to see how feasible it might be.	
81	491	Other			Development 29, Peckham Road SE5 (next to Town Hall) This building was sold this summer to 'Thames Reach' link below so no loner available for SPC-SPF etc to use for its general meetings - as was hoped! Unfortunately, the proposed Southwark Pensioners Hub-Central (Camberwell or Peckham) - Peckham Settlement's new building (old Peckham Housing Office) in Meeting House Lane.....is not in a safe area for OAPs, let alone young people on their own, as this road has been for the last 11-years and still now, a very unsafe area, with many drug-dealing enterprises operating - despite the Peckham Police Station being at top of road on Peckham High Street! I know because I have lived opposite the street so it is my area. I will not even go to the Fish and Chips shop there any more, neither will any other OAPs I know that live near me! The street is also badly lit, and a long walk for OAPs and those with walking problems due to their old age or some kind of disability - from busy Peckham High Street and the Bus Station which has many buses to/from all over the borough and beyond, and the two nearby Rail Stations are to lose all their staff - so also considered unsafe (especially in winter) for OAPs coming to Peckham from outside of Peckham. This has not been thought through properly, and whilst an excellent idea to have in Peckham (centre of S'wark with fantastic transport and Morrisons, the entrance needs to be on Peckham High Street or in the town centre, and not down a long, winding, badly lit, notorious for robbing and drugs, side street! At the recent LBS-Staying Independent consultation held in Peckham Library, Doreen Gee from Walworth attended, as did many other OAPs from all over the borough, as she and they, felt safe getting and leaving from that area of Peckham, but she did state publicly at that meeting, that if the Southwark Pensioners Centre was to move to Peckham - she would not feel safe and would not attend unless it was in a prominent public position as is SPC now, and as was the STH at 30,Peckham Road. Earlier this year, Cllr Dixon Fyle mentioned that it was possibly going to be possible for SPF and SPC public/general/information presentational meetings, to be held at 29, Peckham Road - and we were invited to take a look inside - but now it has been sold as a soup kitchen and employment training for the homeless I understand, called 'Thames Reach'. I suppose LBS are hoping that by the time they find SPC and SPF a new home - we will all have died of old age, and our ashes sprinkled on top of the various allotments round the borough as the cemeteries are too full, and LBS's Social Services don't know in advance, neither does LBS-Housing, in advance, what the wishes of every single OAP living alone are regarding whether they want to be cremated or buried, and if they are on the organ AND body donor list - and have promised their body to that org to take their body to nearest teaching hospital for student surgeons to practice on.....as I have done. PS Cambridge House is too expensive to use as it charges £80 per hour to rent a room!!!	The AAP aims to provide community facilities that meet the needs of a range of groups. Policy 7 sets out our approach to community facilities.
82	491	Consultation			PPS - you promised to put my two email and addresses on the CI Planning List - but you still have not, and SPC needs a home - as I already voiced at the Southwark EiP....so what	The email addresses have been added onto our planning policy mailing list.

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					is happening with this issue in all the plans you are working on?	
83	491	5.2-Stes for major develop ment;			PPPS - Is the new LBS building planned to be build on the Wood Dene old site on Queen's Road SE15 - if so - why can't the new Peckham Hub be part of that site with buses and trains stopping outside it front high street doors?	Appendix B of the AAP sets out our guidance for the former Wooddene Estate.
84	521	3.3.4-Nunhea d town centre			I shop almost daily on the high street but would love to be able to use it more. For a small high street the amount of units empty or being made into homes seems out of proportion. This is an area that is considered poor but people do need variety in the shops, not just take away outlets and more than two of the same businesses. My regular shops are the chemist, butchers, fish mongers, Nunhead Express, bakers and deli just off the main high street.	The vision for Peckham town centre in section 3 and the policies in section 4 particularly on the town centre aim to address these issues. We have introduced a new policy on hot food takeaways which restricts new takeaway uses to 5% or under in any shopping frontage.
85	521	3.3.5-Nunhea d and Peckha m Rye neighbo urhoods			It is really important for a low rise approach policy as parts of Nunhead is a conservation area and being able to feel that you are not living in amongst high rise buildings is important, if not only for people's well-being.	Section 5 sets out the opportunities and policies for each character area. The character area section for Nunhead, Peckham Rye and Honor Oak has a policy on built form which specifies that development should relate to existing buildings heights in the area, which are predominately 2-4 storeys.
86	521		Policy 15		I regularly walk to and from Peckham via Brayards Road. I think I would think twice about cycling to Peckham just because there doesn't seem to be many cycle bays.	All new development must provide cycle parking in accordance with the minimum standards set out in appendix 15 of the Southwark Plan. These standards are referred to in policy 11 of the AAP. Transport Plan policy 1.12 also states that we will provide additional public cycle parking in areas of known high demand. We will keep our cycle parking standards under review and revise if necessary as part of our forthcoming development management policy document.
87	521	5.2-Stes for major develop ment;		15	I am really hoping we get a community centre next to Nunhead Green , but it would be really positive if the building had decent outside space so it could become a focus of Nunhead, rather than a building tucked away and gets lost behind more housing and knocked down within 10 years and sold to a property developer. We, as a nation, are encouraged to find green spaces to grow produce, ecology buildings for our carbon footprint and encourage children and young people to enjoy their living environment. If this is the case the new centre needs to have the space around it and maybe the building of new homes can be shared with our neighbours e.g East Dulwich, Dulwich etc	The AAP identifies PNAAP site 12 as a location for a new community centre. This site is adjacent to Nunhead Green. The council's property team are still working on the proposals for the site and will carry out further consultation in the local area before a planning application is submitted in summer 2012.
88	521	3.3.5-Nunhea d and Peckha m Rye neighbo urhoods			Nunhead is a area that has alot of potential for Southwark Council to encourage small businesses and make it a profitable and desirable area, but without losing it's local vibrancy. There are spaces in and around the area that can be used for gardening projects that can involve the young and old. I know housing is important but it needs to be shared out in the borough and not just in Nunhead as we are not as vocal as other areas in Southwark.	Section 5 sets out the opportunities and policies for each character area. The character area section for Nunhead highlights the opportunity to improve Nunhead local centre. The majority of new housing will take place in the Peckham core action area (1500 homes out of the 2000 target).
89	130		Policy 1		We submit the following representations in relation to the Draft Peckham & Nunhead Area Action Plan on Behalf of Morrisons Supermarkets plc. Section 4.1 of the draft Peckham and Nunhead AAP presents policy options for the future development of Peckham District Centre. We would like to make the following representations in relation to Option 2: · The Aylesham Centre has been identified as an opportunity site. The redevelopment of the Aylesham Centre and the improvement of existing retail parades and shopping facilities should be the priority for the future development of Peckham Town Centre; · the development of a new retail quarter either side of the railway viaduct could undermine potential private investment in the regeneration of the existing town centre and the redevelopment of the Aylesham Centre; · Option 2, if pursued, should only be accommodated on the proviso that Option 1 is fully delivered and that existing retail floorspace is improved and occupied. Otherwise the quality of Peckham District Centre will	The Council's Retail Capacity Study (2009) identified that there is some scope to improve the comparison goods shopping and also provide a limited amount of convenience goods retailing within the town centre to retain and strengthen Peckham's market share. All new large retail development schemes will need to submit a retail impact assessment to address impact on the town centre and also other centres in the borough. We have set out in our Preferred Options Policy 1 that we will promote the majority of additional retail floorspace on the larger town centre sites which include Aylesham Shopping Centre (PNAAP 1); Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6) and Land between the railway arches (PNAAP 3). Through capacity work we think there is likely to be capacity for up to 15,000 sqm of additional retail floorspace. We will continue to work with the major landowners of these sites to discuss what is

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					suffer and its attractiveness will be reduced, with potentially drastic consequences for the vitality and viability of the centre as a whole. We are concerned by the suggestion that the new retail quarter mentioned in Option 2 "could be the location for a new foodstore". In our opinion such a suggestion flies in the face of the conclusions and recommendations of the Council's own retail study, which was published in 2009. According to the retail study Peckham is already very well-served by convenience shopping. 21.2% of all units in the centre are in convenience use, which is already double the national average. Considering these circumstances, the need for a new foodstore at this location is questionable. In fact the Council's own retail study states that it is Peckham's wide array of ethnic food shopping that sets it apart from competing centres and distinguishes its unique specialist food offer. Considering that this specialist convenience offer is one of the District Centre's main strengths it seems counter-intuitive for the AAP to be promoting a policy option that would ultimately undermine this identified strength by favouring convenience development that would compete with existing in-centre specialist food retailers. All new retail development in the centre should underpin and complement this specialist offer, not undermine it. Furthermore, the Council's retail study identified locational convenience floorspace capacity in the North West (Canada Water) and the south of the Borough. The study encourages the Council to direct convenience development to these locations. We trust the Council will bear these comments in mind when drawing up their 'preferred option' for the future development of Peckham District Centre	viable and likely to come forward on each site. More detail on the individual site is set out in appendix B of the AAP.
90	530		Policy 3		Policy 3: Hot food takeaways - page 52 (options) Our Association does not regard the three options proposed as exclusive. In fact, we consider it important that all three are included as part of the Plan. Nunhead already has more than enough takeaways and obesity in young children is both an existing and a growing problem. Implementing all three options would not only help tackle this problem but would provide more opportunities for a wider range of retail shops in the area	We have set out in the Preferred Options policy 4 (Hot Food Takeaways) that we will restrict further growth of A5 use. This includes the two approaches of establishing a 400m exclusion zone around secondary schools and limiting the number of hot food takeaways to 5% and also preventing clustering of A5 units in Peckham and Nunhead town centre protected shopping frontages.
91	530	3.3.4- Nunhead town centre			Our Association fully supports all of the other 'Towards a preferred option policies for the town centre' listed in the document.	Support noted.
92	531	3.3.1- Peckham town centre	Policy 1		Section 3 - Point 3.4 Peckham Town Centre We support the strengths highlighted by the Council on page 33, in particular, the town centre's role as a major centre in Southwark. We consider that the Area Action Plan (AAP) should also recognise that the Aylesham Centre is also a strength in Peckham town centre, providing the only space to meet modern retailer requirements. We would question the bullet point 'historic environment' as this does not apply across the whole of the town centre. We suggest alternative wording such as 'some historical features' or 'areas of historic interest' to loosen the emphasis of this phrase. We comment on the conservation area on Rye Lane later in these representations. We support the Council's strategy for the town centre to strengthen its non-food provision, attract some larger new retailers, and to increase the number of people living in the town centre.	Support noted. We have set out in the Preferred Options Policy 1 that the Aylesham Centre accommodates most of the larger shops, including Morrison's Supermarket and there is the opportunity to redevelop this site to accommodate a larger and more varied quantum of retail floorspace. Further detail is set out in Appendix B PNAAP 1. We have restructured the draft PNAAP. We have made some reference to the historic townscape in the supporting text to Policy 1 which sets out that we will encourage more active uses above shops to add to the character of the Peckham town centre area, maintaining some of its historic legacy. Encouraging residential use into these upper floors will in some cases be reinstating the original use of the building. In addition, Section 5 of the Preferred Options sets out character area policies. Policy 29 for Peckham core action area sets out that new building design will need to be sympathetic to existing characteristics of the conservation areas. Modern design is not necessarily precluded from this. We also set out in this policy that we will ensure that the design of new or refurbished shop fronts considers the policies set out in policy 24 and relevant guidance in the Rye Lane Peckham conservation area appraisal.
93	531	3.3.1- Peckham town centre	Policy 1		Section 4 - Policy 1: Peckham Town Centre We strongly support Option 1 of Policy 1 but consider the estimated floorspace figure of 14,000 sqm identified here to be too restrictive. Substantial additional major retail floorspace should be directed to the Aylesham Centre in the first instance. The benefits of this would be numerous, not least that it provides the viability to potentially address some of the other town centre strategies, namely additional residential and public transport enhancements. Furthermore, a certain quantum of	We have set out in the Preferred Option Policy 1 that the Aylesham Centre accommodates most of the larger shops, including Morrison's Supermarket and there is the opportunity to redevelop this site to accommodate a larger and more varied quantum of retail floorspace. The Council's Retail Capacity Study (2009) identified that there is some scope to improve the comparison goods shopping and also provide a limited amount of convenience goods retailing within the town

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					<p>floorspace will be required to enhance the Centre's existing offer and attract new large retailers to the centre. This includes supporting an enlarged and enhanced foodstore offer. Under no circumstances should Option 2 come forward without investment first being delivered at the Aylesham Centre. This Option should not compete with existing and proposed uses at the northern end of Rye Lane. It could create a very linear town centre, which exacerbates the weakness already highlighted in the 2009 retail study, rather than concentrating investment on increasing the existing density and retail offer. Any new foodstore proposed in Option 2 must be considered in the context of the Council's 2009 retail study and capacity for any new non-food offer. Furthermore, any foodstore comparison offer should be controlled so not to impact on the town centre.</p>	<p>centre to retain and strengthen Peckham's market share. All new retail development schemes will need to submit a retail impact assessment to address impact on the town centre and also other centres in the borough. We have set out in our Preferred Options that we will promote the majority of additional retail floorspace on the larger town centre sites which include Aylesham Shopping Centre (PNAAP 1); Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6) and Land between the railway arches (PNAAP 3). Through our initial capacity work we think there is likely to be an indicative capacity for up to 15,000 sqm of additional retail floorspace in Peckham town centre. We will be undertaking further work to refine the capacity analysis for the identified proposal sites before we consult on the next stage of the PNAAP.</p>
94	531		Policy 19		<p>Policy 19: Parking for Town Centre Uses in the Town Centre It is important that town centre car parking policies provide protection for the existing car parking, whilst providing opportunities for increased provision, if required, should investment come forward for the redevelopment of the Aylesham Centre. All 3 options should be consolidated in to a flexible parking strategy which meets the needs arising from any future investment in the town centre, whilst providing other strategies to encourage the use of public transport.</p>	<p>We will protect sufficient car parking spaces to meet current demand and projected demand over the lifetime of the AAP. This has been determined with regard to the Peckham Town Centre Car Parking and Delivery review study, 2010. Where new development creates demand for additional parking, this will be considered on a site-by-site basis, with regard to the car parking standards set out in the saved Southwark Plan and the London Plan. This is our preferred approach, as set out in the Policy 14 of the Preferred Option document.</p>
95	531		Policy 20		<p>Policy 20: Residential Parking Option I of Policy 20 is supported as it recognises the importance of promoting sustainable modes of transport and the use of public transport. Redevelopment options for the Aylesham Centre will provide the opportunity to reconcile car parking issues associated with the use of town centre facilities and make the most efficient use of an important regeneration site, whilst promoting the use of public transport and reducing the use of private cars.</p>	<p>Core Strategy strategic policy 2 establishes our commitment to promoting sustainable transport throughout the borough. Our preferred approach for residential car parking is consistent with this aim. Policy 15 sets out that we will encourage car free residential development in Peckham core action area, but allow schemes to include up to 0.3 spaces per unit where this level of parking can be justified through a transport assessment. As exceptions to this rule, we will allow disabled car parking and car club spaces to be provided. New commercial development will be required to comply with the maximum parking standards set out in Appendix 15 of the Southwark Plan and in the London Plan.</p>
96	531		Policy 23		<p>Policy 23: Affordable Homes Although we accept this is an existing Core Strategy policy, we oppose the requirement for 35% provision of affordable housing from development proposals for student accommodation. Student accommodation provides a living format for an identified specialist housing need and should not be subject to onerous affordable housing requirements. Town centre regeneration projects can be costly and time consuming, with significant investment required at an early stage. The draft NPPF refers to economic viability and providing a developer with a reasonable return. Blanket requirements for affordable housing could deter much needed investment and regeneration in this area.</p>	<p>The AAP does not alter the approach to student homes that is set out in the Core Strategy. Our draft Affordable Housing SPD clarifies our approach to affordable housing and student accommodation, in line the AAP and the Core Strategy. This includes considering financial viability appraisals where the requirements of the policy cannot be met.</p>
97	531		Policy 25		<p>Policy 25: Family Homes We do not agree with the onerous requirements for family sized dwellings within the Action Area Core, as prescribed in Figure 24. Whilst it is appreciated that there may be a requirement for more family sized dwellings within the Borough as a whole, the Action Area Core is not considered a suitable location for such a high proportion of them. Family dwellings require greater space, not only in terms of internal living space but also open space, amenity space and provision of car parking spaces. Requiring a 20% provision of family sized dwellings in the Area Action Core will contradict policies on residential and town centre car parking, and limit the ability for proposals to make the most appropriate use of land. Providing the appropriate level of open space and amenity space for this high proportion of family housing will be difficult to achieve at Site I with the densities considered appropriate and necessary.</p>	<p>Our approach to family homes is consistent with the adopted Core Strategy. We recognise that the Core Area will be less able to provide family housing and this is reflected in the 20% target, rather than 30% which is applied in the South of the AAP area. However, the majority of new housing will be provided in the core and so we think it is appropriate to require a mix of unit sizes to ensure we achieve a balance. We think that 20% is appropriate as it allows a range of other unit sizes. We are also aware, as set out in the Strategic Housing Market Assessment and the Housing Requirements Study, that there is a particular need for family housing in the area.</p>
98	531		Policy 30		<p>Policy 30: Design We disagree with the approach of Policy 30 in seeking an increase in green spaces, children's play, sports facilities and green routes. Whilst it is appreciated that there will be scope in some locations to achieve this, it will be difficult in the town centre where a balance between high density living and sufficient amenity space needs to be achieved. We disagree with the Council's approach to creating 'fine grained' blocks in</p>	<p>Noted. Policy 1 of the AAP explains that we will use planning conditions to prevent future sub-division below 500sqm where larger retail units are proposed. This is balanced with Policy 29: Built environment which encourages development that increases the vitality, accessibility and activity of Peckham core action area by requiring mixed uses, active frontages and improvements to shop</p>

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					large developments within the town centre. This conflicts with large-scale retail developments, such as in the existing Aylesham Centre and that which might be brought forward in any development proposals. Modern retailers require large retail units and, by the very nature of shopping centres, fine grained blocks would not achieve this. Successful architectural expression can also be delivered in other ways, through design and permeability.	frontages along Rye Lane and Peckham High Street in keeping with the Rye Lane and Peckham Hill Street Conservation Areas. The policy also promotes that development on large sites should create distinctive blocks that have architectural design styles that respond thoughtfully to the character of the area, provide landmarks where appropriate and designed so that its layout and appearance are of a "fine grain", as this is suitable for the Peckham Core Action Area where appropriate.
99	531		Policy 31		Policy 31: Building Heights We are supportive of the principle of allowing some taller landmark buildings and the identification of the Aylesham Centre as such a location. However, we considered that Site is capable of accommodating a taller building than the prescribed 6 to 10 storeys, and sufficient flexibility should be incorporated within Policy 31 to allow for such a landmark building to come forward. This will provide the opportunity to put Peckham Town centre 'on the map' and create an inspiring and iconic landmark building in this area of Southwark.	Our view is that 6-10 storeys the most appropriate height for a tall building on this site. This is based on evidence that we have collected so far, including the Conservation Area Appraisal for Rye Lane Peckham, as well as the Characterisation Study. The characterisation study examines and analyses the make-up of the AAP area, its historic context and makes recommendations for future townscape opportunities, including the potential location of taller buildings. The methodology and approach used in this piece of work has informed our policies in the AAP and the characterisation study will be published as part of the evidence base for the preferred option. We will also be publishing a Tall buildings study as a further piece of evidence base work at the publications/submission stage of the AAP.
100	531	5.2-Stes for major development;		1	Site 1: Aylesham Centre We welcome the identification of the Aylesham Centre as a site for major development. However, we object to the restrictive nature of the estimated capacity of the town centre uses identified in the table on page 98. We consider there is capacity to provide a greater amount of floorspace for town centre uses on the site than is identified. In addition, it is not considered appropriate to include open space within the 'required land uses' in the table on page 98. The AAP should take into account the current use and make-up of the site being an existing shopping centre with no green space provision. We place great importance on the quality of the public realm and see the redevelopment potential at the Aylesham Centre as an opportunity to greatly improve the public realm and hard landscaping instead. This should be recognised in the AAP. The site layout illustrated at Figure 30 of the AAP is considered to be far too prescriptive. An indicative layout and uses should be sufficient otherwise it could deter interest and investment by developers. Similarly, the indicative heights on Figure 30 should either be removed, or emphasised as indicative. There is potential at the Aylesham Centre for a high quality design, landmark tall building (greater than six storeys). The phasing period identified in the table on page 98 should be over a period of 0-5 years as development proposals could come forward for the Centre in the medium term.	We have updated the guidance in Appendix B of the AAP. We have also updated the indicative diagrams for this site. We have removed the details of capacity for non-residential uses. We have removed the reference to the provision of open space on the site. The site layout plans have been amended to remove the indicative blocks and we have added text which states that the site is suitable for a taller building between 6 to 10 storeys. We will provide more detailed information at the next stage once we have carried out detailed capacity studies for the key sites.
101	531	5.2-Stes for major development;		3	Other Sites Other sites identified for retail development, namely Sites 3- 6, should not be supported until retail development comes forward on the Aylesham Centre. Opportunities to move the core retail area away from the town centre will weaken the existing town centre offer and deter potential investment. We do not consider any of these sites to be adequate for providing the necessary space to introduce significant new retail uses to attract new retailers.	We recognise that the Aylesham Centre is one of our key sites in Peckham town centre and we refer to it in policy 1. However, we also recognise that the town centre has potential for a range of retail developments. This is supported by our retail capacity study (2009) and the approach is set out in para 4.2.6 of the Preferred Option. Any new development which includes over 1000sqm will have to carry out a retail impact assessment
102	531	5.2-Stes for major development;		7	Site 7: Bellenden Road Retail Park Including Lidl Site We consider Site 7 to be classified as an out-of-centre site and any retail development here should be considered in the context of Planning Policy Statement 4: Planning for Sustainable Economic Growth. Any retail proposals should not compete with, nor impact upon the other town centre retail uses, and any proposals which would so should be resisted.	Noted.
103	231		Policy 32		Rye Lane Peckham Conservation Area We object to the proposed boundary of the conservation Area which includes the western frontage of the Aylesham Centre. Any new Conservation Area should not include the Aylesham Centre given it is a modern retail development, and not in keeping with the historical character on the other side of Rye Lane. We consider this proposal will hinder potential investment in the Aylesham Centre. The Conservation Area could also be used by other parties as a defensive tool to block	Consultation on the Rye Lane Peckham and Peckham Hill Street Conservation Areas started in Spring 2011 with Community Council, with a public meeting held in July 2011. Letters were sent to all property owners within and beyond the proposed conservation area boundaries and response were taken back to Community Council for response. Over 50 responses were made and there was overall support for the proposed the Conservation areas Both the Rye Lane

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					development in this area and this may also give rise to conflicting issues in relation to proposed taller buildings in this location, which may be considered detrimental to the setting of a Conservation Area. Although there may be some merit in creating a new Conservation Area for some parts of Peckham town centre, it is considered that guidance and control in the form of a shop front Supplementary Planning Document would be more appropriate. It is appreciated that this consultation is not the formal vehicle for commenting on the proposed Conservation Area and that there has been a separate dedicated public consultation on this. However, we were not notified of the Conservation Area consultation, despite raising a concern regarding this in a recent meeting with the London Borough of Southwark on 12 April 2011. We therefore request that the above comments be noted and considered in any determination process for the proposed Rye Lane Peckham Conservation Area. We would be grateful if the comments in this letter could please be taken into consideration in the preparation of the AAP.	Peckham and Peckham Hill Street Conservation Areas were adopted on 18 October 2011. The Aylesham Centre is within the Rye Lane Peckham Conservation area and the Character Area Appraisals accompanying the Conservation Areas identifies it as an opportunity site which if redeveloped, could make a significant contribution to the Rye Lane frontage.
104	524	5.2-Stes for major develop ment;		14	I note that once again the Council is pressuring to build housing on the Choumert Road Car Park. I object strongly to this proposal. At the time of the proposal to build the mosque in Choumert Grove, one of the arguments put forward by the Council for the mosque was there was adequate parking provided nearby by the existence of the Choumert Grove Car Park. Now that the mosque has been in existence for several years and is very heavily used, the Planning Dept. has conveniently forgotten that argument for the mosque. Everything the Council seems to propose appears to be towards killing all the retail at this end of Rye Lane and replace it by housing. This housing will increase the pressure on parking as most of the occupants of the housing will have 1 or 2 cars. Where will they park? The on road parking in this area is already under pressure especially as we have so many churches in and around Rye Lane. 4 Storey housing blocks in this conservation area would be, in shape and size, out of keeping with buildings in the rest of the area. I am very much in favour of keeping the car park but if the Council is so determined to get rid of it I support the idea that here is a fantastic opportunity to create a new park and open space for the local community and any buildings constructed there should be kept to a small number and not as high as 4 storeys.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
105	525	5.2-Stes for major develop ment;		16	I have recently seen the plans that are proposed(which seem to have been kept a secret from most of the local people) for the current early years and the Nunhead community centre sites. I am appalled! How could the council be thinking of all this housing in an area that is already densely populated? Some of the blocks proposed are 5 stories which is much higher than anything existing currently in that area. How can this be quality of life for current residents? Where will all the new residents park their cars, send their children to school. This extra population will strain current transport links even further. I could go on. The area around the Green is low rise housing and the facade of the Nunhead's Head pub is pleasing but all this will be overshadowed by high rise blocks of flats. Please think again	The diagrams and site description for these sites (now PNAAP 11 and 12) have been amended to remove the indicative blocks and to reduce the number of storeys - to 2-3 on site 11 and 2-4 on site 12. Any new housing that is developed on these sites will have to meet the policies on parking in the AAP (Policy 15). We have also amended the text for these sites to clarify that any new development should take the existing character of the area into account, including the Nunhead Conservation Area. The AAP includes a new section 7 which explains how the plan will be implemented, including infrastructure requirements such as new social infrastructure and transport improvements. This section will include more detail at the next stage when it will also be accompanied by an implementation plan.
106	526	5.3- Other develop ments	Policy 19	25	We were impressed with the thought which has informed the Plan, and the clarity and detail of its presentation. A major issue for us concerns activity associated with the Netto supermarket and car park. Netto closed on 17 September 2011 and the new owner, Asda, is currently fitting the store for a re-opening on 4 October 2011. We welcome Asda, and think its presence will be beneficial for this end of Rye Lane. However we hope Asda and Southwark Council will be able to address the extreme traffic problems, in part related to Netto, which have been experiences in Alpha Street for many years, which we outline below. These have been caused firstly by the closure of all exits from Rye Lane towards the west except that of Choumert Road, and then the ban of traffic exiting from Rye Lane into Peckham Rye except for buses. The upshot has been that all westbound or Peckham rye bound traffic passing through Rye Lane must turn into Choumert Road (a street market) and then into alpha Street (because Choumert Road is one-way towards Alpha	Key road network improvements are now set out for the individual character areas in Section 5. The projects referred to here have been developed as a result of transport modelling work that considered the potential traffic impacts of the development proposed through the AAP. They are our current priorities and have committed funding to deliver them. We will continue to monitor the operation of the road network and determine new priorities for improvement, in conjunction with the local community, over the lifetime of the AAP. We have very limited control over the operation of existing supermarket car parks, including deliveries, unless conditions were imposed on the original planning permission. Policy 13 states that for all new development, we will require a transport assessment to demonstrate that servicing and deliveries can be carried out safely and that any negative impacts can be mitigated. Due to feedback from consultation on the

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					Street). Secondly, the Netto car part, which, unlike the Choumert Grove car park, is free, unsupervised and with no restriction on length of stay, is very popular with trades people and shoppers. Cars waiting for spaces in the car park queue up in Alpha Street and traffic builds up behind the queues. Tempers fray, horns blast and eventually the blocked cars begin to mount the pavement in Alpha Street in order to pass the queues, putting pedestrians at risk. This is an almost daily occurrence. Thirdly, deliveries to Netto/Asda are currently made via the Netto/Asda car park. Huge articulated trucks try to negotiate their way through the Choumert Road Market, frequently getting stuck as they turn into Alpha Street, and then again when leaving as they turn from Alpha Street into McDermott Road. Traffic is blocked and also cars parked in residential parking spaces have been hit by these trucks so frequently that residents no longer use the more vulnerable spaces. Our response to the Plan in light of the above issues is as follows: First, we recommend that exits from Rye Lane to the west, and the exit to Peckham rye, are re-opened to cars leaving the Rye Lane so that traffic is no longer funnelled through Alpha Street Secondly, we are concerned about the proposal to close the Choumert Grove car park. This car park is used by shoppers, tradespeople, and also the congregations of local churches and the Choumert Grove mosque. Closure of the car park is likely to divert cars seeking spaces towards the Netto/Asda car park, increasing further the problem of queuing outlined above. Our preferred option is that instead of, or as well as, closing the Choumert Grove car park the Netto/Asda car park is closed. If the Choumert Grove car park is closed, and the Netto/Asda car park remains, then the Council needs to ensure that Alpha Street is protected from people looking for parking spaces. One possibility is that Asda closes the car park to all but Asda users, parking is properly regulated and supervised by them, and queuing is prevented for example by Asda working in conjunction with local traffic wardens. Thirdly, while we do not know what Asda are planning concerning deliveries, we recommend that these are to the front of the shop, in Rye Lane. This would stop the movement of huge lorries through unsuitably narrow residential streets and the associated problems outlined above. Finally, the Action Plan makes an oblique reference to the possible development of the Netto site (Page 136, Table 3). We are all concerned about this, particularly the immediate neighbours on either side of the site, and would like to know if there are any specific developments planned.	towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. There is currently no planning application for the redevelopment of the Asda site. Should a planning application be received in the future, local residents would be notified as part of the formal planning process. Further guidance on the Asda/Netto site is contained in appendix B, in which the site is included as PNAAP 22. This sets out that we would, in principle, support an additional storey if the site is redeveloped.
107	512	5.2-Stes for major development;		1	Why are you planning so much 'Student Accommodation' in Peckham?? There is the Southbank University and the Kings, Guy's St.Thomas' Medical School at London Bridge and London University Goldsmith's College at New Cross, although they already have accommodation around that area. It is family social housing we need, families will not be able to live in student accommodation, probably built to the size of a studio/bedsitter flat. I am sure this accommodation is much cheaper to build but it is not necessary to have even one third of the amount you are proposing in Peckham. We should first get Peckham to a standard where students might wish to come and live and travel from, and to, their colleges. The large, not especially attractive 'metal' block on the corner of Hanover Park with Clayton Road was originally built as student accommodation for Kings College Hospital?? I am not sure that use has materialised as intended?? ie see sites 1,2 5,8 23 - where are all these students?	The overall aim of the AAP is to balance growth with the needs of the local area. The housing policies in the Core Strategy and the AAP aim to provide a range of housing, including affordable housing and family housing. The main uses that we require on this particular site are retail and housing. However the site is large and has the potential to provide a range of uses. Therefore student accommodation is included as another land use that we would consider acceptable but is not the main focus for this site. Any student housing that may be provided on this site would have to comply with our policies to provide affordable housing (35%). We would also be applying our family housing policy to all the housing that could come forward on this site which aims to provide a mix of unit sizes which meet the needs of local residents.
108	527	5.2-Stes for major development;	Policy 19	14	Choumert Grove Car Park I attended the public meeting held on the 19th September 2011. I would like to pass on my views for the current redevelopment plans for this car park. I am a long-standing resident of Chadwick Road and had no idea this was being discussed, only finding out about it by chance. I was dismayed that Southwark Council had not been more robust in their approach to inform local residents about their plans for the immediate area. We receive many leaflets/booklets from the council but none of these have mentioned plans for the car park. Many more local people would have been in attendance at the meeting had it been better publicised. I have read many documents and heard from councillors that Peckham is a multi-cultural, vibrant, lively community. I have always expected that any redevelopment of Peckham would balance the protection of traditional	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years.

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					spaces and the things that make them special against indiscriminate and inappropriate development. We have a diverse range of different shops and cultures that, in the past, the council has been happy to use in order to advertise and promote Peckham to their advantage. The car park is an integral part of that culture and if you remove this important resource trade at the shops in the immediate area may well fall into decline. Locally, it is part of the shopping culture that the shop keepers in Rye Lane offer the additional service of helping to load purchases into customers' cars in the car park. This is good business practice for the shops and also for Southwark as it attracts more customers resulting in more parking fees collected and fewer shops closing down. Making people use the multi-storey car park will lose trade for these shopkeepers as it is too far away for them to offer this service and could take customers to another shopping centre and out of Peckham. The car park offers a valuable resource to the local community. It contains the council recycling facilities and makes them easily accessible to all. Visitors and shoppers to the nearby Bellenden Village also use it as a convenient parking area so they can access those shops. Tradesmen on call in the area use the car park as it is a very open, safe place to park their vehicles. It has also been used as a place to land an air ambulance and treat an injured person. Many disabled shoppers use the car park. It is an open area, which is always quite busy. You do not feel as vulnerable as you do in the multi storey car park. It has good access to Rye Lane for wheelchairs. It is clean and is regularly patrolled by traffic wardens, road sweepers etc. so you can always ask someone for assistance if help is needed. We have a number of places of worship in the immediate area such as a mosque, a church and several new Christian centres and at weekends the car park is nearly full. If you shut this car park you will increase the parking on the surrounding roads. Local residents who pay for their parking permits will not be able to park their cars on the streets where they live. The proposed 4 storey housing development on this site with a capacity of 30 units is not in keeping with the area surrounding the car park. There are no other 4 storey buildings in the immediate area and it would look totally out of place. Under current proposals for parking provision for this development there could potentially be another 20+ cars for which no parking would be provided and so clogging up surrounding streets. Also, according to the printed material you have produced you say that Chadwick Road, Choumert Grove, Choumert Road etc. all have potentially listed buildings in them. Their unique character is something that should be given due consideration when planning redevelopment of the car park.	We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
109	527		Policy 15		On reading through the Peckham and Nunhead Area Action Plan there seems to be little mention of exactly how it will help disabled people in Peckham and Nunhead. I am a wheelchair user and was interested in how Southwark would lead the way in this matter. The only reference I could find to disability was in the new housing developments that you plan. From personal experience, what I find in Peckham is a lack of understanding about disability. Some do not have carers pushing them about and we want to live our lives as independently as possible. On page 66 of the Action Plan (Walking and Cycling) there is no mention of the fact that the pavements on the subsidiary roads adjoining Rye Lane are currently in a poor state of repair and how you are going to rectify this to make Peckham accessible to all. Repairing existing uneven/broken paving and providing more drop kerbs, ensuring that these are on both sides of the road, would be of great help.	The preferred option has been subject to an equality impact assessment, which considers the impacts of policies on the groups identified in the Equality Act 2010 as having protected characteristics. This includes disabled people. Policy 18 highlights that all new residential development will need to meet lifetime homes standards and also that a proportion of new homes will need to meet wheelchair accessibility standards. Policy 15 also states that we will pursue disabled car parking spaces. A number of policies in the saved Southwark Plan address inclusive access, as does the residential design standards supplementary planning document (SPD). Improvements will be delivered as resources as allocated via the Transport Plan, through funds accumulated through section 106 planning obligations/community infrastructure levy or through other sources of funding. As part of new developments, the public realm and potential routes in the vicinity the development will be improved.
110	527		Policy 10		Finally, the one thing that is missing from Rye Lane is public toilets. Southwark want to attract more people into Peckham but are not providing public conveniences. Back streets are being used a urinals and this problem must be addressed in order to achieve this.	Policy 1.7 of the saved Southwark Plan sets out that within the town and local centres developments providing a range of uses will be permitted providing a number of the criteria are met. One of the criteria is that the proposal provides amenities for users of the site such as public toilets, where appropriate.
111	528			15	I am a tenant of the Council living on the ground floor of 7, Citron Terrace, Nunhead Lane, SE15. I am informed and have indeed been given a set of plans for the redevelopment of	The diagrams and site description for these sites (now PNAAP 11 and 12) have been amended to remove the indicative blocks and to reduce the number of

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					the area by my neighbour Ms H. Smith of no. 8, Citron Terrace. I find the plans most distressing as when I moved to Nunhead Lane some three and a half years ago it was a lovely place. The trees on the main road especially outside my door have been cut to what I can only describe as a totem pole. The ones at the back of me which gave me some privacy from overlooking buildings were also topped and I now learn that two four storey blocks are to be put in place of the unused community centre behind me leaving me no privacy whatsoever from the windows and doors that will be in place when the buildings are built. There will also be a three storey block in front of me across the road next to a private house and the lovely willow tree will almost certainly be cut to pieces. With another five storey building next to that. I do not think I will have any daylight coming into my home on the ground floor with new buildings to front and rear and I am also informed that I am going to lose my garden in front of my flat, which will become some sort of mews. The garden has been worked on tirelessly by my mother and I since I have been a tenant of no. 7. The stress this is causing me is enormous as I cannot see myself being able to live in a completely tightly packed built up area with the resultant traffic, noise, parties etc. I have already had to ask people to turn noise down several times on the estate so that I can hear myself think and what it will be like with more people and families I cannot even imagine. I have disabilities and cannot afford to be stressed and at present work full time in the NHS. I have worked hard and spent a lot of money to make my home a nice place to live and am completely disturbed by the plans put forward by the Council. Another problem of course will be the building works themselves which will be like living on a building site and is yet another stress. I hope the above can be taken into some sort of consideration and look forward to a reply, if possible from yourselves.	storeys - to 2-3 on site 11 and 2-4 on site 12. The site description also includes reference to the mature trees on site 12, specifically the willow tree and its root protection zone. Any new housing that is developed on these sites will have to meet the policies on parking in the AAP (Policy 15). We have also amended the text for these sites to clarify that any new development should take the existing character of the area into account, including the Nunhead Conservation Area. New housing will also have to meet our residential design standards which we set out in a Supplementary Planning Guidance. This takes into account issues around daylight, distance from existing buildings, overlooking etc.
112	522		Policy 19	14	I would like to add my name to those who have suggested using the above site for recreational purposes. In one sense, it doesn't seem good to change it anyway, as there are so few parking spaces in Peckham. But people are crushed in living areas and also need space and more greenery.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach will balance the need for new development with the need for car parking and is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
113					Rep deleted - duplication	
114	542	5.2-Stes for major development;		14	I'm writing in respect of the detailed proposal in the Peckham & Nunhead Area Action Plan regarding the use of the current Choumert Grove Car Park area for a future site of housing development. While acknowledging that there is a wide pressure on the Council to provide additional housing, this proposal contravenes everything the Council is trying to do to raise the profile of Peckham and Rye Lane in particular. We're at a cusp in the area's future: the innovation of Bold Tendencies, 5 x 15 evenings, orchestral concerts, the potential use of the stations' old waiting room, the initiatives in the Peckham Plex screenings, the arrival of new 'destination' stores like ASDA, the advent of the Royal Court's Theatre Local scheme in the Bussey Building all these make the need for an easy access, close to source car park vital for these schemes to grow and prosper, attracting not only immediate residents but those who will drive to the area in order to enjoy these attractions and increase the area's buoyancy and economy. So I wish to object to the PNAAP's proposal for the Choumert Grove Car Park for the following reasons: the site is adjacent both to the much-	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and

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					esteemed Holly Grove Conservation Area and the future proposed Rye Lane Conservation area. In this area, houses are historic, predominantly 'village Victorian' and rarely more than two storeys high- three at most. The prospect of four-storey high modern complexes built alongside this architecture would be completely at odds with the current housing in the area and out-of-keeping with the historic resonance of the town centre that the Council is otherwise doing so much to preserve. the area is already one of intense housing: this development would increase the density in such a way as to seriously further challenge a current lack of amenities: viz. congested car routes through the residential roads, inadequate off-street parking, lack of open spaces for families to play the car park is much used especially around weekends when people travel to use the retail outlets in Rye Lane. Removal of adequate parking facilities will seriously impact on local trade, and do nothing to encourage the boosting of local economy that local residents are so desperate to see happen. Out of trading hours, the car park is used by a mix of ages for sporting activity (e.g. skate boarding, cycling, cricket) - underlining a real need for an open space that people living nearby can gravitate to for recreation. the current car park is a vital resource for those attending the nearby Choumert Grove Mosque: indeed when the original site of the Mosque was first mooted, a strong argument for its location was because of the spacious car parking facility close by. The Mosque has an enormous congregation and is currently being expanded. Where will worshippers park their cars? the car park provides an open space where, in the time I've been living here, I've twice seen paramedics land by helicopter to attend to serious 'incidents' in the vicinity of Peckham Rye station- I believe this is called a muster area. with the development of the town centre, car parking close to the station is vital to ensure the vitality and flourishing of Peckham as a destination. Despite arguments regarding the facility provided by the covered multi-storey car park, it is obvious to local residents that car drivers much prefer the openness and accessibility of the car parking provision in the Choumert Grove car park, feeling more at risk if leaving cars in the Cerise Road car park. In short, this proposal contradicts so much of what the Council says it aspires to do in developing Peckham Rye's future town centre. And I would therefore like to log with you my very strong opposition to this development.	protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
115	541	5.2-Stes for major development;		14	Firstly I wanted to thank you for the efforts being made to regenerate the Peckham area. The detailed plans that I have seen seem very thorough and are very encouraging. I recognise of course that it is impossible to please everyone but I did want to take the opportunity to raise my concerns over the proposed development of Choumert Grove car park. I live with my wife and 8 month old daughter in 6 Quantock Mews which is immediately adjacent to the car park. My initial observation is that the proposed blocks of flats are 4 storeys high and I worry about the impact of reduced light to our property. Similarly, it will likely be the case that the trees on the North side of the car park will be blocked. To that end, please accept this as an objection to the flats being 4 storeys high. Furthermore, I would welcome clarification on what 'private amenities' refers to on the plan? I am particularly concerned about the impact of increased footfall, especially at night and the potential increase of noise and anti-social behaviour.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
116	540	5.2-Stes for major development;	Policy 30	14	PNAAP – Choumert Grove Car Park I strongly object to the proposal to build 4-storey housing units on the above car park. This would be totally out of character with the surroundings architecture More open space is needed in our area as well as the need for appropriate car parking facilities. This space could well be used for leisure as a small park, green in nature play facilities for children	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car

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						parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
117	538	5.3-Other developments		22	I refer to Site 22 Land to the West of Lister Primary Care Centre, 97 Peckham Road which has been added to the 'Towards a Preferred Option' document. My clients, the Church of Pentecost, are owners of this site. They proposing to submit a planning application in the near future for a new church and this has been the subject of a pre-application submission. The Area Action Plan identifies options as 'housing, otherwise community or business use' and a church would, therefore, accord with that document. We would like to be consulted on the Area Action Plan as it goes forward and may wish to comment further at the next stage. I would, therefore, be grateful if you could notify me of further progress.	Noted. This site is now PNAAP 17
118	537	5.2-Stes for major development;	Policy 30	14	I am writing to you to register my views on the future of Choumert Road car park in light of the Peckham and Nunhead Area Action Plan proposals. I live at 3 Quantock Mews, which is one of the terraced new-build houses which are immediately adjacent to the car park. I agree with the initial thoughts in the PNAAP in that something should be done with the car park, as it is not satisfactory in its present state. However I strongly disagree with and object to the proposals in the plan for 30 units to be built in 4 storey blocks. I think that this is completely out of keeping with the area (being our houses on one side and 2 storey Victorian houses on the other side). These blocks would be unsightly and would ruin the sightlines that we have from our houses, not to mention blocking out a lot of the light. Having 4 storey blocks would also mean that we are likely to be overlooked and I find this extremely unacceptable. This area is crammed and congested as it is and adding these blocks would make it even more so. Given that the land is on the edge of the Holly Grove conservation area it seems completely illogical to built 4 tower blocks there and it would ruin the area. I believe that the best use for the area would be a park. This would provide a welcome green space close to Peckham town centre/Rye Lane, which is extremely built up and lacking in open space. It would also be more in keeping with the area. Having a playground there would also benefit the children in the area. The other playground in the area (Warwick Gardens) is relatively far from the town centre and is always busy. It is rare to have an opportunity to increase the amount of green space in this area. We should not spurn it and make matters worse by building tower blocks. If housing has to be built on the site then it should be in keeping with the area, that is to say a few small houses, but certainly not the 4 storey blocks that have been proposed. I look forward to hearing your views on the matter and seeing a revised proposal.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
119	536	5.2-Stes for major development;	Policy 19	14	I live in one of the houses that directly overlooks the car park and therefore have a keen interest in developments. The option of a green space (gated and locked in the evenings) sounds like the best solution. There is already a high density of buildings, including housing, in the area and the addition of a green space would help enormously in breaking that up and providing a focal point for the local community. I would be very grateful if you could keep me in touch with future developments.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
120	535	5.2-Stes for major	Policy 30	14	I understand that it is proposed to use this land 30 housing units in 4-storey blocks. I have no fundamental objection to units use for some housing but would object violently to a	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue

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		develop ment;			housing design that resembles the most recent development adjacent to the site: Quantock Mews. This form of housing is quite an eyesore. The design and appearance is banal and uninspiring and out of character with the surrounding attractive older Victorian cottages in Choumert Grove, Chadwick Road and Choumert Square. I think it makes some sense to complete the row of terrace houses by building across the existing Choumert Grove car park entrance. In this case the vista looking down from the top of Chadwick Road should be made as attractive as that obtained looking up the road towards Grove Park, Camberwell. I am in sympathy with the general view in the neighbourhood that new buildings for private housing should be low rise and low density and that the site should include green spaces or a small park area.	the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
121	535	5.2-Stes for major develop ment;	Policy 19	14	There should be no vehicle exit to Choumert grove from any new development in order to reduce traffic at a dangerous corner. Moreover, the volume of vehicle traffic along "little" Chadwick Road – which is far too narrow for the amount of through traffic (buses and heavy lorries, refuse vehicles etc.) forced up it by an ill-thought out one-way system – should be further reduced by using the wider streets on either side (Blenheim Grove and Choumert Road) as the main traffic thoroughfares.	Reviewing the operation of the two one-way systems around Bellenden Road has been identified as a priority and funding has been committed to review this project. This is set out in the West Peckham Character Area, Section 5.4. This followed transport modelling work that considered the traffic impacts of the development proposed in the AAP. We will continue to monitor the operation of the road network and determine new priorities for improvement, in conjunction with the local community, over the lifetime of the PNAAP Access to and from new development is considered in detail as part of the assessment of individual planning applications. It is too detailed an issue to address through the Area Action Plan.
122	534	5.2-Stes for major develop ment;	Policy 30	14	am writing in response to the public consultation to say that the building of 30 housing units in 4-storey blocks would be a disastrous way forward for Peckham. The message I get from many residents is that there is too much building going on in Peckham and Nunhead, which has led to a sense of overcrowding and lack of open space. Where the Council has resisted the urge to fill every available space with housing, and allowed the development of a green area instead, the benefits to the surrounding community have been marked. The small public garden that was created at McDermott Road is a pleasure to walk through or sit in. To turn at least part of Choumert car park into a park or garden, with play space for children, would benefit the area of Rye Lane where such facilities are few. If there is to be any housing, it should be kept to a small number and certainly not as high as 4 storeys in what is an area of low rise housing. We need to see open space and sky as well as bricks!	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
123	533	5.2-Stes for major develop ment;	Policy 19	14	I am a local resident and I would like to voice my views about the future plans for Choumert Grove car park. I live on Choumert Road, and pass the car park every day, and I am very much in favour of the area being used for a community green space of some kind. I understand there is an urgent need for housing in London, but if it is possible to balance this with the benefits of more areas of nature, that would be ideal - rather than using the space solely for housing. Peckham town centre is an extremely built up and busy area, with hardly any areas that feel natural or beautiful. A small park behind the high street would be very welcome - especially one with play facilities for children - which are seriously lacking in this area.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
124	532	5.2-Stes	Policy 9	14	Please do not give up our only bit of open space. I would like to think the Council has	Due to feedback from consultation on the towards a preferred option, our

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		for major development;			enough guts and resources to stand up to developers and give the local people what they want.	preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
125	543		Policy 1	25	Policy 1 – Peckham Town Centre Option 1: Focus on improving existing retail areas. This policy aims to maintain and enhance Peckham's status as a major town centre. Option 1 proposes a means of not only achieving this target, but also enabling existing local facilities, services and conveniences to be enhanced and their long term viability secured. The Netto site offers an ideal opportunity for improving the existing retail parade along this section of Rye Lane. The emerging AAP already identifies Netto as being appropriate for comprehensive redevelopment and potentially a mix of uses. From a policy and urban design perspective, we are confident that the site is suitable for retail use(s) at ground floor with several storeys of high quality residential development above. The highly sustainable location presents the opportunity to maintain the active frontage at street level whilst delivering new homes and new patrons to assist and support the revival of this identified major town centre. New residents in this location will be essential to supporting the independent stores of the area and ensuring that the new shops/cafes and other facilities identified in the document are viable going forward It is crucial that residential uses in key locations such as this are considered and secured against the other ambitions of the AAP to secure the regeneration, viability and vitality of this area as a major town centre, alongside Canada Water and Elephant and Castle.	We have set out in our Preferred Options Policy 1 that we will promote and maintain a vibrant balance of uses along either side of Rye Lane and Peckham High Street to help strengthen the shopping environment. Appendix B of the Preferred Options sets out the former Netto (now Asda) store (PNAAP 22) could have potential for an additional floor of development to improve the street frontage which could include a mix of uses to include retail on the ground floor and possible business or housing use above.
126	543	5.3- Other developments	Policy 2	25	Policy 2: Culture, tourism and the evening economy This policy identifies the Council's ambitions to work with businesses to facilitate the provision of more cafes and restaurants, making Peckham a better place to go out in the evening. Residential uses must be secured above the Netto site to ensure that ambitions such as those identified in Policy 2 and both options 1 and 2 are achieved. New local residents will make a significant contribution to supporting local businesses and local restaurants in particular.	We have set out in our Preferred Options Policy 1 that we will promote and maintain a vibrant balance of uses along either side of Rye Lane and Peckham High Street to help strengthen the shopping environment. The majority of new retail provision will be on the large development sites identified in Policy 1. Appendix B of the Preferred Options sets out the former Netto (now Asda) store (PNAAP 22) could have potential for an additional floor of development to improve the street frontage which could include a mix of uses to include retail on the ground floor and possible business or housing use above.
127	543		Policy 4		Policy 4: Space above shops This policy aims to allow flexible use of space above shops for residential, retail, business and community uses within Peckham town centre. This is the Council's preferred option and as such is an important consideration in taking the AAP forward. As mentioned in the document, this approach will ensure that better use is made of the limited space in the town centre and residential is considered an appropriate use both now and historically. It important to recognise that a flexible approach to the future uses above shops will be key to ensuring that those that come forward are appropriate and viable. Placing overly prescriptive constraints on development parameters such as use, height, density may skew market forces and result in unviable and undeliverable interests. The last two points, namely viability and deliverability should also be given specific consideration in this document as otherwise ongoing challenging market conditions could jeopardise the re-vitalisation of the area. In particular, flexible approaches should be considered and accounted for in certain circumstances with regard to matters such as S106 agreements, CIL charges and affordable housing provision to ensure that the requisite inward investment is attracted into the Borough.	We have set out in the Preferred Options Policy 1 our support for bringing vacant upper floors above ground floor shop units in Peckham town centre back into use. A range of uses will be considered, providing criteria are met to ensure the use is acceptable and increases vitality of the town centre. We have set out in Section 7 of the Preferred Options the approach to delivery and implementation. We have adopted SPDs on s106 Planning Obligations and Affordable Housing which already set out our approach to these issues. We will also be preparing a Community Infrastructure Levy (CIL) which will be a new charge to help fund new infrastructure. Later this year we will carry out the first stage of consultation on our CIL. We will provide more detail on our approach and how it links with the AAP at the next stage next of consultation on the AAP.

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128	543		Policy 19		Policy 19: Parking for town centre uses in the town centre Option 2: To consolidate the existing car parks, use the car parks at the Aylesham Centre and possibly develop a town centre car park on an alternative site. Given the local pressures and limited space for development in the Borough, option 2 is an excellent means of not only concentrating and managing traffic, but also freeing up further development opportunities.	Support noted. Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. This approach is supported by our car parking study, which highlighted the over-supply of car parking in Peckham town centre, even at peak times.
129	543		Policy 20	25	Policy 20: Residential Parking: Core Area Car Parking is a complicated matter and it is advised that schemes be judged on their specific requirements and appropriate levels of car parking be negotiated. For example, redevelopment of the Netto site for the provision of residential development above the retail unit may warrant a shared parking solution between the two facilities.	Our preferred approach is to encourage car free residential development in the core action area, but to allow schemes to include up to 0.3 spaces per unit where this level of parking can be justified through a transport assessment. As exceptions to this rule, we will allow disabled car parking and car club spaces to be provided. This approach is set out in AAP policy 15. Car parking provision for commercial developments will be considered on a site-by-site basis, with reference to the car parking standards in appendix 15 of the saved Southwark Plan and in the London Plan.
130	543		Policy 21	25	Policy 21: Providing New Homes The provision of new homes above Netto will make a significant contribution to delivering this preferred option of 2000 new homes across the action area. In accordance with the other policy aspirations identified in the toward a preferred option document, the site is capable of delivering a substantial number of new, high quality and well-designed dwellings. Furthermore, it is a key, sustainable location in which the best and most efficient use of land can and should be both encouraged and achieved.	Noted. We have allocated the site referred to in the Preferred Options document as Proposals site PNAAP 22, with an indicative capacity of approximately 15 residential units.
131	543		Policy 22	25	Policy 22: Density This policy correctly highlights that where appropriate, there should not be a maximum threshold on density, thereby ensuring that appropriate use is made of sites in sustainable and appropriate locations. Schemes should indeed be assessed on their individual merits through analysis of site specific opportunities and a quality design approach. The Netto site would indeed be appropriate for a high density residential development solution given its highly sustainable and central location in the town centre.	Support noted. The AAP states that development in the core action area may exceed the density ranges if it is of exemplary design in accordance with the Residential Design Standards SPD section 2.2.
132	543		Policy 23		Policy 23: Affordable Homes It is crucial for the Council and this emerging policy document to acknowledge the importance of scheme deliverability. To ensure the AAP is successful in stimulating growth, vitality and regeneration, the document must recognise there may be viability constraints associated with some sites and as such exceptions will have to be made on affordable housing provision and S106 contributions to ensure the necessary inward investment is secured.	Our draft Affordable Housing SPD provides a flexible approach to our affordable housing policies, including setting out how we will consider financial appraisals and scheme viability. All proposals will be considered on a case by case basis and there may be some circumstances where we will accept a departure from policy if it is justified to our satisfaction through a financial appraisal.
133	543		Policy 24	25	Policy 24: Private Homes It is crucial for the Council and this emerging policy document to acknowledge the importance of scheme deliverability. To ensure the AAP is successful in stimulating growth, vitality and regeneration, the document must recognise there may be viability constraints associated with some sites and as such exceptions will have to be made on affordable housing provision and S106 contributions to ensure the necessary inward investment is secured.	Our approach to affordable housing is set out in the Core Strategy. Our draft Affordable Housing SPD provides a flexible approach to our affordable housing policies, including setting out how we will consider financial appraisals and scheme viability. All proposals will be considered on a case by case basis and there may be some circumstances where we will accept a departure from policy if it is justified to our satisfaction through a financial appraisal. The onus is on the developer to make the case that the requirements of the policy cannot be met.
134	543	5.3-Other developments	Policy 25		Policy 25: Family Houses It is important that policies retain an element of flexibility to ensure that sites in key sustainable locations, such as Netto, can provide an appropriate mix of dwelling sizes to satisfy the demand for the location. Decisions with regard to dwelling sizes should be based on site specific opportunities and constraints.	The AAP sets out our policies for family housing and dwelling sizes.
135	543		Policy 31	25	Policy 31: Building Heights The Netto site is capable of accommodating at least four storeys of residential development. Prescriptive policy restrictions on height should be	Our view is that one additional storey is appropriate on this site. This is based on evidence that we have collected so far, including the Conservation Area

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					avoided to ensure that appropriate design solutions can be derived and efficient use of land be made based on site specific opportunities.	Appraisal for Peckham Rye Lane, as well as the Characterisation Study. There is more detail on this site in Appendix B which specifies that any development on this site must be in keeping with the surrounding buildings. The characterisation study examines and We have commissioned a characterisation study which is a piece of work which closely examines and analyses the make-up of the AAP area, its historic context and makes recommendations for future townscape opportunities, including the potential location of taller buildings. The methodology and approach used in this piece of work has informed our policies in the AAP and the characterisation study will be published as part of the evidence base for the preferred option. We will also be publishing a Tall buildings study as a further piece of evidence base work at the publications/submission stage of the AAP
136	543	5.3-Other developments		25	Development site 25: Netto Supermarket There is a clear and identified need to promote development in this part of Peckham and in particular along Rye Lane. To re-iterate a number of the points made previously in this letter, the Netto site represents an excellent redevelopment opportunity. The site is capable of providing an active frontage on to Rye Lane with retail unit(s) on the ground floor and several storeys of residential development above. The site is in a key, sustainable location and provision of new homes here will be essential to the success of the AAP and the rejuvenation of this town centre. New residents will not only support the viability of new and existing local businesses, but will also be essential in ensuring the town becomes a vibrant and inviting location for visitors.	Noted. The AAP recognises the opportunity for redevelopment on this site by designating it as a proposals site.
137	539	2-Peckham and Nunhead			I emphasise the vital importance of the need for rail services that connect Peckham to central London regularly	Noted. Section 2 of the AAP sets out information on transport provision.
138	539		Policy 20		All car parking developments should include designated spaces for car clubs, the proportion to increase over time	Car clubs are one of a range of sustainable transport measures that we encourage. Our current approach is to ask developers to provide a number of years' free membership of a car club to their new residents, but to actually set out on-street car-club spaces ourselves, rather than incorporate them into individual developments. This way car club cars are available not just to new residents of the development, but also to the wider community.
139	539	5.2-Stes for major development;	Policy 9	11	Flaxyards site: why give up this valuable green and open space? Many people walk their dogs here or have picnics; it's a welcome open green space north of the High Street.	This Flaxyards site is a development site as set out in the proposals site schedule to the Southwark Plan 2007.
140	539	5.3-Other developments		25	Netto Supermarket site is not a suitable site for the creation of a whole new residential development, since it would require considerable volume of pedestrian entry and exit onto Rye Lane.	The AAP suggests that the site is only suitable for around 15 residential units on one additional storey. This would not generate significant additional pedestrian flows.
141	539	5.3-Other developments		28	Peckham Rye Baptist Church is a very distinctive landmark that is visually attractive and open out Rye Lane spatially. It should be kept for church or community use.	The AAP sets out that the church could be retained and additional community and / or residential could be added to make better use of the site.
142	539		Policy 15		Location of Bicycle Hire Scheme I welcome the plan's proposal to lobby for extension of the Mayor's Bicycle Hire scheme to Peckham. Maybe I missed something, but I didn't see where it was proposed the bikes would be stored. The plan needs to make clear explicit proposals about the potential sites.	Support noted. Transport for London currently have no plans to extend the cycle hire scheme to Peckham and Nunhead, but it is an issue that the council supports in principle and will continue to lobby for, as set out in policy 11. If expansion becomes likely, we will consider in more detail the locations that might be appropriate for cycle storage
143	539		Policy 15		The plan states that new developments should include bicycle storage but does not give a target. It is essential to include a specific target for the amount of cycling storage since the retrofitting of cycling storage space is extremely difficult, and the increased use of bicycles	Providing adequate cycle storage is an essential step in encouraging more cycling in the borough. Convenient, secure and weatherproof cycle parking is required by Southwark Plan policy 5.3 and minimum standards are set out in

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					is already happening, will continue and has considerable health benefits. People cannot use bicycles if they have nowhere safe and easy to store them. Given the aim of establishing the Mayor's Bicycle Hire Scheme in Peckham, a target of at least 50% of the adults expected to live in or use such developments should be sufficient for the immediate future, although it may need increasing at a later date. This target needs to apply to new commercial developments as well as residential developments. People are not going to cycle to work if they cannot store their bike easily and safely when they arrive.	Appendix 15 of the same document. This includes a requirement for an additional 10% to be set out as visitor spaces that are publicly available. The policy applies to residential and commercial developments throughout the borough. Policy 11 of the AAP refers to these existing standards. Transport Plan policy 1.12 also states that we will provide additional public cycle parking in areas of known high demand. We will keep our cycle parking standards under review and revise if necessary as part of our forthcoming development management policy document.
144	539		Policy 29		The explicit need for optimal use of south-facing aspects on new build I welcome the plan's use of the energy hierarchy, starting with energy efficiency. However, the implications of this for the planning of new development were not made explicit and thus it is not clear to the casual reader what this means or how to evaluate new proposals. To be specific, all new developments should be designed to: take advantage of the maximum solar gain for heating, be maximally efficient at cooling when hot (thus avoiding the need to be dependent on air conditioning and the production of electricity to power air conditioning), and have south-facing aspects for solar thermal water heating, photovoltaics for electricity and food growing. These requirements need to be stated explicitly in the plan, so that everyone can understand in specific, concrete terms what the energy hierarchy means for the nature of the built and non-built environment in the area, rather than some vague abstract concept. This will enable new developments to include such features, be evaluated in the light of them, and consequently be implemented, for the benefit of all.	This is a borough-wide issue and is therefore too specific to be set out in the AAP. Our approach to energy reduction is set out in policy 13 of the core strategy. We have set out further detail on how we will apply the energy hierarchy and how we will encourage energy efficient design in our sustainable design and construction SPD and out design and access SPD.
145	539		Policy 1		Issues relating to the transition to sustainable transport use I welcome the plan's aims of supporting the move to more use of sustainable transport (walking, cycling, short-term vehicle hire and public transport). However, it is unrealistic to expect people to switch from private car use to other forms of transport without the provision of secure shopping storage space for use whilst shopping in Rye Lane. In addition to functioning as means of transport, cars also function as places to store shopping when people make multiple large purchases in the area. Consequently, in the absence of private cars or secure shopping storage spaces, people will be likely to make fewer and smaller purchases on Rye Lane. Given the large rises in energy prices that are expected over the coming years, this is likely to mean the significant loss of customers, especially for more valuable items, which conflicts with the plan for Rye Lane to function as a valued shopping destination for people, particularly those outside the area. The plan therefore must include locations for the provision of secure shopping storage spaces as both now and in future developments. This includes the need to have high quality aesthetics informing the design of such secure shopping storage spaces as well as convenient locations.	Support noted. Reference to secure shopping storage space in new developments is too detailed for inclusion within the AAP. This sort of issue could potentially be discussed at the detailed planning application stage for the redevelopment of sites in the town centre.
146	539	Other	Policy 29		Recycled fuel storage and water storage issues Nowhere does the plan give consideration to suitable locations for the storage of recycled vegetable fuel. Whilst production may be suitable on the local industrial sites identified in the plan, the storage of such valuable resources will need more careful consideration. As energy prices rise, the likelihood of recycled vegetable fuel being stolen will increase. Secure places for its storage that are both resistant to attack by vandals and easily monitored (i.e. by being located in places where people are regularly present at all hours) will therefore need to be found, and these need to be included in the plan. The plan needs to include provision for the secure storage of water for food growing.	This issue is too specific for the Peckham and Nunhead Area Action Plan, We will look at our approach to energy and implications for land use in terms of storage and operation in future Local Development Framework (LDF) documents such as the Development Management DPD.
147	539	5.2-Sites for major development;		6	Rye Lane South in particular feels like a narrow rabbit run through which people are forced to walk in only one direction. I therefore welcome the proposal to open out the space in front of Peckham Rye Station, although it is very far from ideal that largely concrete buildings in front of the station that have not yet paid the carbon debt of their construction and use would be demolished as a result. In addition to the architectural conservation issues for preventing the demolition of buildings in Peckham and Nunhead, there are compelling carbon reasons for preventing demolition as much as possible.	The removal of the buildings in front of Peckham Rye station provides an important opportunity to create a public square and a gateway to the station. In this instance it is necessary to remove the existing buildings to improve the appearance of the area. The proposals have also been championed by a number of local groups. In addition, as part of the post-2011 riot response, the GLA announced a GLA Regeneration Fund to assist those areas affected by the riots. We submitted a bid for money from this fund and in January 2012 it was

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						announced that the project would be receiving money from this fund for the project. Within the bid the key proposal is to create a Peckham Rye gateway by creating a public square in front of the listed station building, demolishing the arcade and encouraging people to actively use the space.
148	539		Policy 19	14	Given the aim the plan expresses of opening out Rye Lane, it is astonishing that it is proposed that Choumert Grove car park – currently the only open space on the west side of Rye Lane South – could be used for building development. This completely defeats the aim of opening out Rye Lane. The west side of Rye Lane South feels cramped since there are only two roads intersecting with it, and one of them contains a sprawling market (Choumert Road/Rye Lane intersection). Consequently, the Choumert Grove space must be preserved as an open space in some form.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
149	539		Policy 5		Rye Lane South East has far more intersections with other roads than Rye Lane South West, but less than optimal usage of the potential spatial aesthetics because of the repeated positioning of market stalls flush with the frontages of Rye Lane itself. This is despite the existence of potentially attractive small squares that could be a really positive addition to the town centre (e.g. Parkstone Square at the top of Parkstone Road, Atwell Road). The current position of the market stalls currently cuts these squares and the commercial premises in them off. The plan therefore needs to address the current and future patterns of space usage in these areas. It should be noted that these squares are potentially extremely attractive, small-scaled places that offer the opportunity for more intimate, friendly and relaxed forms of commerce than is possible on the main line of Rye Lane, and that could significantly contribute to a more welcoming atmosphere in Rye Lane South as a whole.	We have acknowledged that locating market stalls off Rye Lane would help to reduce clutter and free up space for pedestrians. We have set out in our Preferred Options Policy 5 on Market provision that we will work with landowners to bring forward space to locate new markets in the area. We promote the creation of new public spaces in development sites such as the proposed new square outside Peckham Rye Station (site PNAAP 6) and public spaces within the Copeland Road Industrial Park (site PNAAP 4), the cinema and multi-storey car park (site PNAAP 2), the Aylesham centre (site PNAAP 1) and the land between the railway arches (site PNAAP 2). These new spaces could also potentially include provision for markets stalls. We are also working with Network Rail and the Greater London Authority to open up the space in front of Peckham Rye Station to create a new public square in the heart of Peckham. Section 5 of the Preferred Options sets out policies on the character areas within the AAP area. Policy 29 'Peckham core action area' identifies that the street frontage on Rye Lane is of varied quality and there are gaps in the continuity of the streetscape which interrupt the rhythm, form and activity of the street frontage and the roofline. Development of these sites and improvement to existing shop frontages will help to increase the attractiveness of the town centre. The designation of the Rye Lane Conservation area supports this desire to improve the look of Rye Lane and surrounding streets. We have identified public spaces within the town centre as needing improvements and have submitted a bid for the Mayor's Outer London Fund for improvements to public space at the eastern end of Elm and Holly Grove.
150	539		Policy 5		The plan seems to claim that the establishment of new market sites will create market diversity. Whilst I welcome the proposed developments around the station, I challenge this assertion. What the plan seems to envisage for Peckham is the creation of a new cultural quarter around the station, with market stalls there to reflect the cultural theme. This sounds dangerously like the creation of a posh cultural ghetto that will contribute to the further segmentation and separation of the commercial and cultural life of Peckham residents along ethnic and economic lines. This misunderstands the exciting potential of the flexible use and positioning of market stalls. The use of Peckham Market Place for a farmers' market on a Sunday is a very good example of how, by placing an unexpected type of market in an unexpected location, less segregated commercial and social interactions can be encouraged. When I first moved to Peckham 5 years ago, the weekly Farmers' Market was virtually exclusively attended by white middle class people who did not live in the market location, whilst those who lived in or near the area did not frequent the market at all. Now however, the market is used by people from many different ethnic groups. Whilst this may partly reflect the increased sentiments in favour of buying direct from farmers, I would also strongly argue that the positioning of this market in an	We have set out in our Preferred Options Policy 5 general support for new markets and street trading areas in Peckham town centre to help add to and increase the variety of retail offer. We have not identified a preferred site for a new market, however have identified the land to the rear of Peckham Rye station could be a possible location for further consideration. We also set out that we will support occasional markets on Peckham Square and Nunhead Green.

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					unexpected location has had an important social impact in reducing community barriers to some extent, by making Farmers' Market supporters active in a part of Peckham they might not otherwise visit, and by showcasing a new type of product to the residents and users of that area. All these effects are very much to be welcomed, and are unique to the nature of market stalls as temporary in physical terms but regular in terms of time. The plan should therefore include the flexible and unexpected location of some market stalls throughout Peckham so that their potential for helping reduce community barriers can be maximised.	
151	539	3.3.1- Peckham town centre			Maintenance of the public realm on Rye Lane The plan emphasises the issues of new development and expresses the view that new developments will contribute to the economic development of Peckham Town Centre. It must be stressed however, that without a very strong commitment to on-going basic maintenance of the public realm throughout Peckham Town Centre, these benefits will not occur. Cllrs Fiona Colley and Barrie Hargrove are to be congratulated for their prompt action in getting builders' rubble removed from the side of Parkstone Square within a week of their post-riot walkabout. However, it needs to be emphasised that that rubble had been there for over a year, and that the back wall and exposed garden of an adjacent house remains broken and overgrown with weeds. There is absolutely no point anyone spending millions of pounds on developing new buildings – or believing such investment can be attracted - when basic maintenance and cleaning is not carried out as a matter of course. This requires active and persistent working together by the council, local business and local residents. Built environment changes at some point in the future must not be substituted for political will and muscle in the present.	At the next stage, section 7 of the AAP will have more information and detail on the provision of infrastructure alongside development as well as an infrastructure plan.
152	539	Other			Usage of unused gardens and land for plant and food growing Given the high numbers of Peckham residents who do not have access to a garden themselves, and our increasing food security issues, there should be serious consideration given to the right for local residents to use unused easily-accessible gardens or unused land if they have been left unused for over a year. Growing Southwark, a Peckham-based organisation that is already doing excellent work encouraging local residents to grow plants, should be included in discussions as to how to implement this. Examples of where this could occur include the house adjacent to Parkstone Square with a broken back wall and the former Wooddene Estate. The neglect that local residents are currently compelled to show such places (as a result of the lack of any planning or policy on this matter) conveys a very poor impression of Peckham as a place that is abandoned and uncared for. I do not know anyone who wants Peckham to have such a poor impression. This impression is likely to repel rather than encourage outside commercial interest in the area, especially in the current economic climate. Addressing the need for good garden and land maintenance at the same time as improving our food security is surely a no-brainer, and needs incorporation into the plan.	Policy 19 on Open spaces refers to opportunities for new open spaces and food growing.
153	539	3.3.1- Peckham town centre	Policy 1		The needs of local shoppers and the range of businesses on Rye Lane The plan asserts that the range of business on Rye Lane meets the needs of a significant proportion of local shoppers. As a professional psychologist with extensive training in research methods, I emphasise most strongly that the survey of shoppers on Rye Lane on which this assertion is made is completely invalid evidence for this claim. Of course anyone shopping on Rye Lane is going to say the shops there meet their needs – that's why they are there! However, such a survey design does not address the unexpressed needs of those Peckham residents who do not shop on Rye Lane but would like to shop locally because they weren't asked. What are their needs and wishes? The sample of this survey is thus entirely biased in favour of a self-satisfied and lazy assumption that the range of businesses on Rye Lane is what the local community wants. In fact, there is a wide belief, expressed by people from many different ethnic and economic backgrounds in private, that the range of businesses on Rye Lane needs to be radically improved. The plan needs to take this issue far more seriously, and stop using invalid evidence to support an out-of-	We have set out in our Preferred Options Policy 1 that we will promote and maintain a vibrant balance of uses along either side of Rye Lane and Peckham High Street to help strengthen the shopping environment. The Council's Retail Capacity Study (2009) which has informed our draft policies, identified that there is some scope to improve the comparison goods shopping and also provide a limited amount of convenience goods retailing within the town centre to retain and strengthen Peckham's market share. The study included an in-centre survey which concluded that people felt there was a poor range of either comparison retailers, food stores, restaurants/cafes or the poor range of department stores as their primary dislike of the centre Through the promotion of new retail floorspace in the town centre this will help ensure local people have access to a better range of shops and services and reduce the need to make trips to other centres to do their shopping.

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					date view.	
154	539	5.2-Steps for major development;	Policy 2	2	Demolition of the cinema and car park I was horrified to read of the proposal to demolish the cinema and car park, for two reasons. Firstly, on carbon and energy grounds, I am strongly opposed to the demolition of buildings in general. Secondly, the cinema and car park are the hub of the cultural life of Peckham, and pivotal to the burgeoning cultural economy. The work of Hannah Barry in creating Bold Tendencies is internationally recognised and brings huge credit and interest to Peckham – why on earth is anyone considering demolishing the car park where it is based??? Similarly, the cinema – which has long been a treasured resource due to being one of the cheapest cinemas in London – is increasingly a vibrant and diverse cultural resource. Both the cinema and the car park need to be preserved, encouraged and celebrated, not demolished.	<p>We recognise the valuable cultural resource a cinema in the town centre provides to the local community. Policy 27 for the Peckham core area sets out that “A cinema should be retained in Peckham core action area”. We have set out in the Preferred Options that if plans to redevelop the site which currently contains the cinema and car park come forward, a cinema will need to be maintained on the site, unless appropriate facilities can be provided elsewhere in the area. We have identified other appropriate sites where a cinema could be located which include Eagle Wharf (PNAAP 10) and Copeland Road Industrial Park (PNAAP 4).</p> <p>Our justification for identifying the site for redevelopment is evidenced from a car parking study (2010) which examined the future demand for parking resulting from different levels of growth in Peckham and Nunhead. The study identified 2,225 car parking spaces in and around Peckham town centre, consisting of on-street spaces, off-street council owned car parks and supermarket car parks. The study showed that less than half the off-street car parking spaces are used during the week, rising to 60% at the weekend. Future growth scenarios and it was identified that there would still be an excess of car parking spaces in all but the highest growth scenario. The study highlighted that the Cerise Road multi-storey car park is under-used.</p> <p>Choumert Grove car park was identified as having spare capacity, however due to its central location, its use is expected to increase as the town centre grows. Consultation on the previous stage of the AAP has highlighted an overwhelming level of local support for not developing Choumert Grove car park. Copeland Road car park has higher levels of use during the week, but lower levels of use at the weekend. The supermarket car parks at Lidl, Asda (formerly Netto) and Morrisons, tend to be well used. Of the council owned car parks, our intention is to retain Choumert Grove car park as a car park, and develop Copeland Road car park (site PNAAP 7) and the Cerise Road multi-storey car park (site PNAAP 2).</p>
155	539	3.3.1-Peckham town centre	Policy 8		Temporary and experimental uses of commercial properties in Rye Lane and elsewhere The plan needs to make explicit provision for the temporary and experimental use of commercial properties in Rye Lane and elsewhere, so that business innovation can be encouraged. Without experiment, we will not discover the new commercial opportunities from which we can all benefit. For instance, the respected environmental charity BioRegional has explored the logistical issues surrounding the establishment of materials-re-use businesses (for instance, the re-use of remaindered items from small-scale building works) and a major key factor preventing the viability of such businesses, even on a not-for-profit basis, has been the prohibitive cost of premises (that then prevents sufficient materials storage). Given that there are already several large scale premises on Rye Lane that have been empty for several years, and the austere economic climate, the plan needs to encourage the temporary and experimental use of such properties so that we can learn how to exploit new and unusual opportunities, rather than relying on economic development via restaurants, cafes and shops.	<p>We have set out in our Preferred Options Policy 6 that we will support the provision of new business floorspace in Peckham town centre. We set out the new development should support business start-ups and growing SMEs through the provision of flexible space, suitable for a range of business types and sizes. Identifying the promotion of temporary and experimental uses in commercial properties on Rye Lane is considered too detailed for inclusion in the AAP.</p>
156	539		Policy 4		Wider use of space above shops I welcome the proposal for wider use of space above shops, and share Eileen Conn’s concern that this should be implemented in a way that does not encourage the further proliferation and segmentation of sites of worship in Peckham Town Centre. My preference would be for the spaces above shops to be for residential uses, since people living in these spaces will help ensure their better maintenance than non-residential use. However, if this is to be encouraged, where are the residents to store their bicycles?	<p>Support noted.</p> <p>Our preferred option Policy 1 sets out we will support proposals which bring vacant upper floors above ground floor shop units in Peckham town centre back into use. To ensure there is a balanced mix of uses in the town centre we have set out a number of criteria in our preferred option for Policy 1 which will ensure the proposed use is acceptable and increases the vitality of the town centre. The</p>

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						Preferred Option Policy 11 on 'Active Travel' requires new developments to Provide convenient, secure cycle parking that meets or exceeds the minimum standards in the Southwark Plan and the London Plan.
157	539		Policy 30		Design of windows on all new developments to enable food growing All windows on all new developments need to be capable of opening fully so that occupants can grow food in window boxes or up walls and harvest the food. This applies to be residential and commercial premises.	AAP Policy 19: Open spaces and Sites of importance for nature conservation (SINCs) looks at how we will provide an accessible, high quality green infrastructure network for residents and visitors to enjoy that strengthens local character, promotes nature conservation, exercise and food growing opportunities. This issue is at a level too detailed to include in the AAP. We can look at this in other Local Development Framework Documents at a later stage.
158	539	6-Delivering:working together to make it happen			Who are the Southwark Alliance? Last but not least – as an active resident in Peckham for the last 5 years, I have never heard of the Southwark Alliance before. The claim that they represent my views is just not valid. I strongly support Eileen Conn's proposals for working with and engaging the community in Peckham and Nunhead at grassroots and neighbourhood level, making use of those networks within the area that already exist as a starting point.	Southwark Alliance are the Local Strategic Partnership. Section 7 of the AAP who we will work with in preparing and implementing the AAP eg the local community, landowners, local businesses etc.
159	154	Other			As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Accordingly English Heritage welcomes the opportunity to comment upon the P referred Option for the Peckham and Nunhead Area Action Plan.	noted
160	154		Policy 30		Main comments Historic Environment We welcome the recognition the historic environment is given in the Peckham and Nunhead AAP. However further changes should be made to the strategies of each character area, and policy 30 Design so that the local historic environment is robustly recognised and valued as part of managing future change.	<p>The Preferred option AAP includes five new character area visions setting out the character, opportunities and policies for each. Section 5 of the preferred option AAP sets out the character areas in Peckham and Nunhead. Theme and area-specific policies have been prepared which cover:</p> <ul style="list-style-type: none"> • Land use • Transport and movement • Built Environment – public realm and built form • Natural Environment <p>AAP Policy 26: Heritage sets out how the character of Peckham and Nunhead will be strengthened by conserving and enhancing the significance of Peckham and Nunhead's heritage assets. This includes considering the impact of development on the area's heritage assets and their settings such as conservation areas, listed buildings, locally listed buildings, archaeology and registered historic parks.</p> <p>Policy 23 – 25 of the AAP states that we will work to ensure high quality design to protect and enhance the character of areas in Peckham and Nunhead. Development must consider their impact on neighbouring conservation areas to ensure they conserve and enhance these historic areas. We have buildings with local value by identifying these buildings on a list named "Possible locally listed buildings". These proposals are shown on figure 16 and are listed in appendix C of the AAP.</p> <p>We have commissioned a characterisation study which has closely examined the make-up of the AAP area, its historic context and makes recommendations for future opportunities. This document will be published as part of the evidence base for the preferred option.</p>
161	154		Policy 32	32	In addition policy 31 Heritage conservation needs to be broadened in its intention so that it covers all heritage assets across the whole area and emphasises explicitly the positive	We have updated the heritage policy (policy 26) to provide more detail. This AAP now includes a section which covers the 5 character areas in Peckham and

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					and proactive promotion of heritage led regeneration	Nunhead. The character areas also have new policies on built environment which cover the key design and heritage issues in each area.
162	154		Policy 32	32	Finally the site specific details need to recognise and value any relevant heritage assets that would be impacted by the development of each site. This includes existing and proposed heritage assets (e.g. Peckham town centre (Rye Lane) and Peckham Hill Street, and locally listed buildings). The details of these heritage assets should be explicitly addressed in the text and associated figures.	The site guidance for our proposals sites is set out in Appendix B. This section sets out guidance for each site and makes reference to relevant heritage assets where appropriate, specifically conservation areas.
163	154		Policy 31		All these changes need to be made so that the AAP reflects fully PPS5, principally the Government's Objectives for the historic environment (para 7), policy HE2 – evidence base for plan-making, policy HE3 – regional and local planning approaches and the relevant development management policies.	Noted. See detailed comments in response to the rest of our officer responses below.
164					Rep deleted - duplication (English Heritage)	
165					Rep deleted - duplication (English Heritage)	
166	154		Policy 31		Tall Buildings In general it is noted that the AAP seeks to provide clarity on the appropriateness. However based on the information provided further clarity is required with regards to the following important issues: - The evidence developed and used to assess the appropriateness of locations for taller buildings. - The type and detail of any impact assessments undertaken in order to identify any potential harm tall buildings may have upon the significance of heritage assets (both existing and proposed) including their settings. - Consistency between policy wording, figures and site specific details on where tall buildings will be acceptable and at what scale. These issues need to be addressed in order to provide sufficient justification for the policy approach set out in the AAP.	The Core Strategy Strategic Policy 12 sets out appropriate locations for tall buildings and requires tall buildings to have an exemplary standard of design whilst being appropriate to context, the historic environment and conserving and enhancing views. This is in line with the CABE and English Heritage Guidance on Tall buildings (2007). Saved Southwark Plan Policy 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites also looks at how the impact of taller buildings can be addressed. AAP Policy 25: Building heights shows our approach to taller buildings in the action area. AAP Policy 26: Heritage sets out how the character of Peckham and Nunhead will be strengthened by conserving and enhancing the significance of Peckham and Nunhead's heritage assets. The Core Strategy Borough-wide Tall Buildings Background Paper (March 2010) forms an evidence base to support approach to our tall building policies. We have commissioned a characterisation study which is a piece of work which closely examines and analyses the make-up of the AAP area, its historic context and makes recommendations for future townscape opportunities, including the potential location of taller buildings. The methodology and approach used in this piece of work has informed our policies in the AAP and the characterisation study will be published as part of the evidence base for the preferred option. The council published Character Area Appraisals for the Rye Lane and Peckham Hill Street Conservation Areas which were adopted on 18 October 2011. These appraisal as well as the characterisation study outlined above seek to identify important views, local character and heritage assets in the area such as listed buildings and key views. We will also be publishing a Tall buildings study as a further piece of evidence base work at the publications/submission stage of the AAP.
167	154		Policy 31		Evidence Base A key omission at present is the lack of detailed evidence to support the location of tall buildings at specific sites in the area. The Core Strategy provides a broad framework of where tall buildings may go with a commitment that, at the AAP stage, further detailed analysis will be developed as evidence to help justify the appropriateness of tall buildings at specific locations. From the information provided this commitment has not been met. We would therefore advise that this evidence should be developed and include details of how the areas heritage assets have been sufficiently conserved, in line with English Heritage/CABE Guidance on Tall Buildings (2007).	We have commissioned a characterisation study which is a piece of work which closely examines and analyses the make-up of the AAP area, its historic context and makes recommendations for future townscape opportunities, including the potential location of taller buildings. The methodology and approach used in this piece of work has informed our policies in the AAP and the characterisation study will be published as part of the evidence base for the preferred option. We will also be publishing a Tall buildings study as a further piece of evidence base work at the publications/submission stage of the AAP. We look forward to working closely with English Heritage to during the preferred option consultation to discuss this work and our approach.
168					Rep deleted - duplication (English Heritage)	
169					Rep deleted - duplication (English Heritage)	

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170	154		Policy 31		It is noted that a Sites background paper has been prepared to accompany the draft AAP, however on considering its details it appears that the elements of the 'paper' have not been fully translated into the AAP. Principally these shortcomings relate to the consideration of the historic environment when identifying the capacity of sites to deliver development. For example para 3.2 of the 'paper' omits consideration of policies 30, 32 and 33 in taking into account the delivery of the sites. Elsewhere heritage related national and London Plan policies appear not to have been considered (para's 4.1-4.9). However under the Capacity Studies (para 4.17) consideration of the sites and surrounding historic environment is identified as part of the capacity process, however this important stage has not been explicitly recognised in the detailed text of the site specifics (section 5 of the AAP).	The Sites background paper is a summary of how we calculated capacities, particularly on housing and retail on various key sites within the AAP. For all of our sites we take into account policies and guidance within our Core Strategy, SPDs, draft AAP and London Plan policies. We are updating this paper for the next stage of consultation and will be carrying put further detailed capacity work then. At this stage we will involve with English Heritage discuss this work and approach.
171					Rep deleted - duplication (English Heritage)	
172					Rep deleted - duplication (English Heritage)	
173	154	Other			Detailed comments on the Preferred Option AAP and Interim SA are attached in the Appendix.	noted
174	154		Policy 31		To help ensure the preparation of the AAP and its supporting evidence base we strongly support the involvement of the Borough's own conservation staff as they as they are often best placed to advise on local heritage matters. We are keen to work with the Council to resolve the current issues raised before the submission of the AAP to the Secretary of State. We look forward to discussing the details of this letter and how the AAP can be appropriately amended.	Our policies have been written in conjunction with our design and conservation team, and they have also been closely involved in the characterisation study we have commissioned. We look forward to working closely with English Heritage to during the preferred option consultation to discuss this work and our approach.
175					Rep deleted - duplication (English Heritage)	
176					Rep deleted - duplication (English Heritage)	
177	154	Other			Finally, we should like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, where English Heritage consider it appropriate to do so.	Noted.
178	154				Key Challenges and Opporunities: We would suggest that the conservation and enhancement of Peckham's and Nunhead's heritage assets and wider historic environment should explicitly recognise as a key opportunity, principally through heritage-led regeneration.	We have identified the wider historic environment and the fact that it should be optimised in the challenges and opportunities section.
179	154		Policy 1		The Vision for Peckham could make a stronger connection to the historic legacy of its town centre and its consideration as a conservation area. In addition it is noted that the Vision seeks to ensure the scale of the development will be similar throughout Peckham except in the town centre where some taller buildings and more intense development on some sites could be accommodated. We would strongly advise that the application of this approach should be based on detailed robust evidence that demonstrates that the scale and density of future developments add to the distinctiveness of Peckham and does not cause irreversible harm to its local character or historic environment (PPs1 and PPS5).	We have set out in the Vision that the heritage in Peckham will be celebrated and used to stimulate regeneration, including through the Rye Lane Peckham conservation area. We have set out more information in section 5.2 of the Preferred Options on the character of Peckham town centre which provides detail on the history of the area. The Preferred Options also include more detailed design (building form and height), heritage and public realm policies. These policies will be supported by a Characterisation Study which we are currently preparing, which will be prepared in accordance with English Heritage guidance 'Understanding Place: Historic Area Assessments in a Planning and Development Context'. We will also be preparing an Urban Design evidence background paper which we will consult upon at the publication/submission stage of the AAP.
180	154				The Theme We would make explicitly reference to heritage assets as well as the historic environment as key element of the design and heritage theme	The text for theme 5 does refer to the use of heritage as an asset to promote positive change.
181	154	3.3.1- Peckham town centre			Welcome the reference to the historic environment, however we would suggest that the text is expanded so that the change in the town centre will build on its strengths particularly its 'rich and diverse heritage assets and wider historic environment'. Underneath the 'strategy' we would suggest that the reference to the town centres heritage is amended as	More detail on the strengths and the strategy is provided in the policies and within the character area section for Peckham core action area. This is based on information from our characterisation study, which will be available as part of the consultation on the Preferred Option document.

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					follows: 'Using the town centre's heritage assets as a catalyst for asset in regeneration and identifying new heritage assets such as locally listed buildings and by creating a conservation area along Rye Lane. ' In contrast to the Vision, it is noted that the strategy makes no reference to the scale, form and density of future developments, principally the promotion of taller buildings and intense developments. Is this an omission or intentional?	
182	154	3.3.1-Peckham town centre			We would suggest to aid the articulation of the vision, that the areas heritage assets are illustrated on the map	All the heritage assets are shown on the heritage map. The character area maps have been kept relatively simple although they have been updated to reflect the conservation areas.
183	154	3.3.2-Queens Road			There are a number of statutory listed buildings along both Consort Road and Queens Road, which help define the character of the area. We would suggest that the continue conservation of these assets should be recognised in the strategy. In the case of their settings, this could be achieved through public realm improvements that recognise the significance of these assets and their settings.	This section has been replaced by a new section which provides details on all the character areas. This is section 5 of the Preferred Option document. Each character area has a map which shows the key issues and opportunities including conservation areas. There is also a new policy (no 26) on heritage in the Preferred Option AAP.
184	154	3.3.2-Queens Road			We would suggest to aid the articulation of the vision, that the areas heritage assets are illustrated on the map.	This section has been replaced by a new section which provides details on all the character areas. This is section 5 of the Preferred Option document. Each character area has a map which shows the key issues and opportunities including conservation areas.
185	154	3.3.3-Peckham neighbourhoods			In line with the commitment to protect and enhance elements of the natural environment in the Peckham neighbourhood, we would seek the areas heritage assets and wider historic environment are given the same consideration. In particular we would seek to ensure that the areas heritage assets such as Sceux Gardens, Caroline Gardens, and Holly Grove Conservation Areas, the various listed buildings and other locally listed buildings and important spaces/gardens are recognised.	This section has been replaced by a new section which provides details on all the character areas. This is section 5 of the Preferred Option document. Each character area has a map which shows the key issues and opportunities including conservation areas and open spaces.
186	154	3.3.3-Peckham neighbourhoods			Peckham neighbourhood vision We would suggest to aid the articulation of the vision, that the areas heritage assets are illustrated on the map	This section has been replaced by a new section which provides details on all the character areas. This is section 5 of the Preferred Option document. Each character area has a map which shows the key issues and opportunities including conservation areas.
187	154	3.3.4-Nunhead town centre			The majority of Nunhead town centre falls within the Nunhead Green Conservation Area, yet this designation and its purpose as area of special architectural or historic interest the character or appearance of which is desired to preserve or enhance. The 'strategy' should therefore recognise the areas status and demonstrate a commitment to its conservation and enhancement in line with PPS5.	This section has been replaced by a new section which provides details on all the character areas. This includes a full description of the area, it's character, history and the key opportunities.
188	154	3.3.4-Nunhead town centre			Nunhead town centre vision We would suggest to aid the articulation of the vision, that the areas heritage assets are illustrated on the map	This section has been replaced by a new section which provides details on all the character areas. This is section 5 of the Preferred Option document. Each character area has a map which shows the key issues and opportunities including conservation areas.
189	154	3.3.5-Nunhead and Peckham Rye neighbourhoods			In line with the commitment to protect and enhance elements of the natural environment in the Nunhead and Peckham Rye neighbourhood, we would seek the areas heritage assets and wider historic environment are given the same consideration. In particular we would seek to ensure that the areas heritage assets such as Nunhead Green, Nunhead Cemetery Conservation Areas, Nunhead Cemetery and Peckham Rye Park Registered Historic Park and Gardens, the various listed buildings and other locally listed buildings and important spaces/gardens are recognised.	This section has been replaced by a new section which provides details on all the character areas. This is section 5 of the Preferred Option document. Each character area has a map which shows the key issues and opportunities including conservation areas and open spaces.
190	154	3.3.5-Nunhead and Peckham Rye neighbourhoods			Nunhead and Peckham Rye neighbourhoods vision We would suggest to aid the articulation of the vision, that the areas heritage assets are illustrated on the map.	This section has been replaced by a new section which provides details on all the character areas. This is section 5 of the Preferred Option document. Each character area has a map which shows the key issues and opportunities including conservation areas.

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		urhoods				
191	154	3.3.1-Peckham town centre	Policy 1		It is noted that under Option 1, it is expected that around 14,000sqm of additional shopping space could be provided within the centre. It is not clear whether this capacity figure was achieved through an understanding of the historic environment of Peckham and its capacity to accommodate this quantum of additional space. We would seek assurances that the significance of the centres heritage assets whether existing or proposed (i.e. proposed Rye Lane conservation area) will not be harmed through the expectation of delivering this scale of new retail space.	We have set out in our Preferred Options Policy 1 that we will promote the majority of additional retail floorspace on the larger town centre sites which present the most opportunity for redevelopment/improvement which include Aylesham Shopping Centre (PNAAP 1); Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6) and Land between the railway arches (PNAAP 3). Through our capacity work we think there is likely to be an indicative capacity for up to 15,000 sqm of additional retail floorspace, with the majority being accommodated on the sites listed above. The AAP policies will be supported by a Characterisation Study which we are currently preparing, and this will be prepared in accordance with English Heritage guidance 'Understanding Place: Historic Area Assessments in a Planning and Development Context'. We will also be preparing an Urban Design evidence background paper which we will consult upon at the publication/submission stage of the AAP. This will take into account the historic environment in relation to the assessment of the opportunities for development on sites. Our capacity analysis work takes into account the density policy set out within our adopted Core Strategy and also other policies including those relating to heritage. We will set out more detail at the publication/submission consultation stage of the AAP on how we calculate our site capacity figures. Our Saved Southwark Plan Policies on Urban Design and Conservation will also be used alongside the AAP policies in determining planning applications.
192	154		Policy 9		Open Spaces We would seek to ensure that the historic interest of the areas open spaces such as the Registered Historic Parks and Gardens, important integral spaces that help define the character of conservation areas and/or listed buildings, and other non-designated spaces of heritage value are recognised in the policy wording	Registered historic parks and gardens are considered under policy 26 heritage in the preferred option AAP. Registered parks and gardens are also designated as protected open spaces and are therefore covered in this policy under their relevant open space designations – for example Nunhead cemetery is a registered historic park and is also designated Metropolitan Open Land.
193	154		Policy 21		It is noted that the policy sets targets for the delivery of 2000 net homes across the whole action area and 1500 within the core action area. We would seek clarity on whether the area-wide target includes the town centre target or is an additional figure. In addition we would seek clarity on the how the figures set have been reached within the context of their deliverability and potential impact upon the historic environment, more specifically the areas heritage assets (existing and proposed). We are concerned that the targets set could raise expectations of delivery and could bring to bear pressure on sites which may part of a heritage asset (e.g. conservation area and or listed building) or impact upon the setting of heritage assets. We note that the supporting text to policy 22: density states that the historic context was taken into account, but it is not clear how this was done	2000 is the total figure. We have clarified the wording to make this clearer. We carried out a capacity assessment using the mid-range of our density targets which used CAD diagrams and looking at the surrounding area, including conservation areas and listed buildings, to see where the development could take place on each site. At the next stage we will have carried out more detailed massing studies for the key large sites where most of the housing will be delivered.
194	154		Policy 30		In general we are supportive of the approach set out in the policy and expanded in connection with the different character areas. However there are a number amendments we would suggest should be incorporated in order to strengthen the policy and its potential interpretation. These are set out below: - Typo – first line makes reference to figure 18. Should this not be figure 26? Or is there another diagram which helps illustrate the different character areas (e.g figure 8)? Peckham town centre – - Bullet point 4. We would suggest that reference should be made to the desired skyline of Peckham town centre, which should be fine in grain, reflective of the prevalent scale, and help reinforce the local and historic distinctiveness of the area. It is noted that in contrast to the other areas no indication is given of acceptable scales of development albeit it is noted that appropriate scales are mentioned in policy 31. - Bullet point 5. We would suggest the wording is amended to reflect our comments to the 'strategy' for Peckham town centre and its emphasis upon the positive and proactive use of heritage assets as a catalyst for heritage-led regeneration. This includes understanding and enhancing the existing significance of these assets through, for example, existing and proposed conservation area appraisals	Noted. The Preferred option AAP includes five new character area visions setting out the character, opportunities and policies for each. Section 5 of the preferred options AAP sets out the character areas in Peckham and Nunhead The and area-specific policies have been prepared which cover: • Land use • Transport and movement • Built Environment – public realm and built form • Natural Environment AAP Policy 26: Heritage sets out how the character of Peckham and Nunhead will be strengthened by conserving and enhancing the significance of Peckham and Nunhead's heritage assets. This includes considering the impact of development on the area's heritage assets and their settings such as conservation areas, listed buildings, locally listed buildings, archaeology and registered historic parks. Policy 23 – 25 of the AAP states that we will work to ensure high quality design to protect and enhance the character of areas in Peckham and Nunhead. Development must consider their impact on neighbouring conservation areas to ensure they conserve and enhance these historic areas. We have buildings with local value by identifying these buildings

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					<p>and management plans that are specific to the area. This change in wording and direction reflects more PPS5. Queens Road · Reflecting our previous comments on the Queens Road ‘strategy’ we would suggest that the policy should promote the conservation of the areas heritage assets when considering opportunities for redevelopment (bullet point 1)and improving the public realm (bullet point 3). Peckham neighbourhoods · Bullet point 4. In contrast to the Peckham neighbourhood ‘strategy’ we welcome the reference to the areas heritage assets. However we would suggest the wording is amended so that it emphasises the positive and proactive use of heritage assets as a catalyst for heritage-led regeneration. This includes understanding and enhancing the existing significance of these ssets through, for example, existing conservation area appraisals and management plans that are specific to the area. This change in wording and direction reflects more PPS5. Nunhead town centre · Bullet point 5. In contrast to the Nunhead town centre ‘strategy’ we welcome the reference to the areas heritage assets. However we would suggest the wording is amended so that it emphasises the positive and proactive use of heritage assets as a catalyst for heritage-led regeneration. This includes understanding and enhancing the existing significance of these assets through, for example, the existing Nunhead Green conservation area appraisals and management plan. This change in wording and direction reflects more PPS5. Peckham Rye and Nunhead neighbourhoods · Bullet point 5. In contrast to the Peckham Rye and Nunhead neighbourhoods ‘strategy’ we welcome the reference to the areas heritage assets. However we would suggest the wording is amended so that it emphasises the positive and proactive use of heritage assets as a catalyst for heritage-led regeneration. This includes understanding and enhancing the existing significance of these assets through, for example, the existing conservation area appraisals and management plans. This change in wording and direction reflects more PPS5. We are doing this because. We would suggest that the second line is amended to reflect the core strategy’s commitment to developments to be contextually responsive and sensitive to existing local and historic characteristics.</p>	<p>on a “Local List”. These proposals are shown on figure 16 and are listed in appendix C of the AAP. We have commissioned a characterisation study which has closely examined the make-up of the AAP area, its historic context and makes recommendations for future opportunities. This document will be published as part of the evidence base for the preferred option</p>
195	154		Policy 31		<p>We support the clear statement made of requiring developments to be of two to four storeys in the AAP area. However we are concerned that the second bullet point supports the placement of taller buildings (6 to 10 storeys) at key landmark and gateway locations in a number of named sites. To support this approach and to be in line with PPS5, robust detailed evidence needs to be provided which demonstrates clearly that the significance of heritage assets including their settings would not be harmed through the promotion of these sites as being acceptable for tall buildings. This includes heritage assets that are being proposed or under consideration for designation such as the Rye Lane conservation and locally listed buildings. In addition as reflected in our comments below to the named sites, there is a need for consistency and clarity on where tall buildings will be acceptable and at what height. For example policy 31 states that tall buildings are considered to be between 6 and 10 storeys, yet many of the site specific details provided in section 5 highlight possible building blocks of 6 storeys, which meet policy 31 definition of tall buildings. However the supporting text does not recognise this fact. In addition Figure 26 highlights a substantial part of Peckham as a location for taller buildings. We would suggest that this figure needs to be refined to be clear where taller buildings may be acceptable. In all cases we would expect detailed evidence to be provided that is proportionate to the nature of the DPD and that reflects English Heritage/CABE Guidance on Tall Buildings (2007). In this case the AAP includes site specific issues which we would expect to see detailed evidence that the scales being promoted and their locations (where clearly shown) have been robustly modelled in order to assess their impact especially upon the significance of heritage assets including their settings. Typo – bullet point 2. Second line makes reference to figures 28-31. Should this not be figures 29-32?</p>	<p>We have removed figure 26 from the AAP. The Core Strategy Strategic Policy 12 sets out appropriate locations for tall buildings and requires tall buildings to have an exemplary standard of design whilst being appropriate to context, the historic environment and conserving and enhancing views. This is in line with the CABE and English Heritage Guidance on Tall buildings (2007). Saved Southwark Plan Policy 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites also looks at how the impact of taller buildings can be addressed. AAP Policy 25: Building heights shows our approach to taller buildings in the action area. AAP Policy 26: Heritage sets out how the character of Peckham and Nunhead will be strengthened by conserving and enhancing the significance of Peckham and Nunhead’s heritage assets. The Core Strategy Borough-wide Tall Buildings Background Paper (March 2010) forms an evidence base to support approach to our tall building policies. We have commissioned a characterisation study which is a piece of work which closely examines and analyses the make-up of the AAP area, its historic context and makes recommendations for future townscape opportunities, including the potential location of taller buildings. The methodology and approach used in this piece of work has informed our policies in the AAP and the characterisation study will be published as part of the evidence base for the preferred option. The council published Character Area Appraisals for the Rye Lane and Peckham Hill Street Conservation Areas which were adopted on 18 October 2011. These appraisal as well as the characterisation study outlined above seek to identify important views, local character and heritage assets in the area such as listed buildings and key views. We will also be publishing a Tall buildings study as a further piece of evidence base work at the publications/submission stage of the AAP.</p>

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197	154		Policy 31		Context in design - Figure 26 We would suggest that the annotation of 'taller buildings' is refined so that it reflects closely the text of policy 31 and the sites named and detailed in section 5.	Figure 26 has now been removed from the preferred option AAP
198	154		Policy 32		In general support the policy approach subject to further amendments that help ensure all heritage assets are appropriately conserved and enhanced, throughout the area. At present the end part of the policy implies that only in conservation areas will there be a presumption to conserve and enhance. To avoid this potential interpretation we would suggest the following wording is used: Conserving or and enhancing Southwark's Peckham and Nunhead's and heritage assets, their settings and wider historic environment. This includes positively and proactively utilising the areas heritage assets as a catalyst for regeneration, and where relevant using conservation area appraisals and management plans to inform change as in conservation areas illustrated in figure 27. We support the intention of designating two new conservation areas in Peckham town centre and Peckham Hill Street and look forward to their adoption. However we would seek to ensure that the proposals for change as set out in this AAP do not prejudice the future conservation of the historic interest of these potential conservation areas. For example it is noted that many of the sites specifically identified in the AAP either fall within or could impact upon the setting of these future conservation areas. However unfortunately the details of these conservation areas, where relevant, are not explicitly recognised in the site details as set out in section 5. This omission should be addressed.	Policy 26 on heritage has been updated.
199	154		Policy 33		We welcome the proactive promotion of locally listed buildings within the AAP. To help aid understanding of what is meant by locally listings we would suggest making reference to English Heritage's Good Practice Guide to Local Listing Consultation Draft (Feb 2011), plus highlight PPS5's concept of heritage assets, which includes locally listed buildings. Finally it is not clear from the text the timetable for adoption of the locally listed buildings identified in the AAP. Can this be clarified, so that they are protected before the AAP is adopted?	We have inserted a fact box on locally listed buildings. Our design and conservation team will be consulting on a local list of buildings across the whole of Southwark in Spring 2012. It is likely that this list will be adopted in late 2012. We will update the AAP at the next stage of consultation, and consultation on the AAP is planned for September 2013.
200	154	5.2-Sites for major development;			We welcome the inclusion of site specific details within the AAP and the intention of the information to provide clarity on what type and form of development could be considered appropriate for each site. However we would strongly suggest that further clarity is required with regards to the relationship of each site with the historic environment. This includes identifying and valuing heritage assets that fall within or may influence how each site is developed (such as proposed conservation areas and locally listed buildings). This could be expressed through the text details and on the Figures. In addition demonstrable evidence needs to be provided that shows that the significance of heritage assets affected by each site has been fully assessed. This is especially important in the case of considering the impact of tall buildings upon the setting of heritage assets. This could come in the form of 3D modelling and detailed visual analysis of heritage assets. At present this is not clearly shown or addressed in the text or associated illustrations. In addition a number of the figures show suggested building heights, which in general is welcomed, subject to the inclusion of heights above AOD. However in some cases further annotations are included that highlight the opportunity for taller buildings, however it is not clear what height would be acceptable at these specific points. How much higher than the stated building block height? In addition a number of sites details include building blocks of 6 storeys - are these considered tall buildings within the context of the associated text? Finally we would strongly suggest that the start of Section 5 makes it clear that further detailed analysis should be provided when developing these sites and that analysis of the impact of their development upon relevant heritage assets and the wider historic environment should be fully undertaken (hence reflecting PPS5 policy HE6). Details specific to the sites identified are provided below.	We have updated the text for all the sites in Appendix B, including clarifying which are in conservation areas or suitable for a tall building etc. We will provide more detailed information at the next stage for the key sites, including modelling and a full capacity assessment which takes into account all the surrounding site issues.
201	154	5.2-Stes for major		1	Aylesham Centre Following issues need to be addressed: - In the site details reference should be made to the conservation and enhancement of the potential Rye Lane	Noted. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the

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		development;			Conservation Area. It is not clear whether the estimated capacity for the site has considered the influence of the conservation area on its development. · Under Key opportunities reference should be made to the potential for a taller building on the site and clarity on its expected height.	setting of conservation areas and listed buildings etc. The next stage of the document will include more detailed massing studies for the key large sites.
202	154	5.2-Stes for major development;	Policy 2		Cinema/multistorey car park Following issues need to be addressed: · In the site details reference should be made to the conservation and enhancement of the potential Rye Lane Conservation Area. It is not clear whether the estimated capacity for · Under Key opportunities reference is made to the potential for a taller building on the site however the figure 31 does not annotate this opportunity. Is this intentionally?	We have set out in Appendix B of the Preferred Options details for the proposal site for the PNAAP 2- Cinema/Multi-storey car park We state that a taller building could be appropriate on this site to help mark Peckham Rye Station and the centre of Peckham but due to the site's location adjacent to Rye Lane Peckham conservation area, careful consideration must be given to conserving and enhancing the wider heritage setting.
203	154	5.2-Stes for major development;		3	Land between railway (East of Rye Lane including railway arches) Following issues need to be addressed: · In the site details reference should be made to the conservation and enhancement of the potential Rye Lane Conservation Area and the existing Holly Grove Conservation Area (that adjoins the site). It is not clear whether the estimated capacity for the site has considered the influence of the conservation areas on its development. · Under Key opportunities reference should be made to the potential for a taller building on the site and clarity on its expected height	Noted. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc. The next stage of the document will include more detailed massing studies for the key large sites.
204	154	5.2-Stes for major development;		4	Copeland Road Industrial park (Bournemouth Road) Following issues need to be addressed: In the site details reference should be made to the conservation and enhancement of the potential Rye Lane Conservation Area and the existing Holly Grove Conservation Area (that adjoins the site). It is not clear whether the estimated capacity for the site has considered the influence of the conservation areas on its development. · Under Key opportunities reference should be made to the potential for a taller building on the site and clarity on its expected height.	Noted. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc. The next stage of the document will include more detailed massing studies for the key large sites.
205	154	5.2-Stes for major development;		5	Site of the former Wooddene estate Following issues need to be addressed: · Under Key constraints reference should be made to the numerous listed buildings on Queens Road that face towards the site. Their settings could be impacted upon through the scale and form of development promoted. It is not clear whether the estimated capacity for the site has considered the setting of the listed buildings on its development. · Under Key opportunities reference should be made to the expected height of the landmark building.	Noted. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc. The next stage of the document will include more detailed massing studies for the key large sites.
206	154	5.2-Stes for major development;		6	Peckham Rye station Following issues need to be addressed: · In the site details reference should be made to site falling within the Holly Grove Conservation Area	Noted. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.
207	154	5.2-Stes for major development;		7	Bellenden Road retail park site Following issues need to be addressed: · In the site details reference should be made to proximity of Holly Grove Conservation Area, and variety of listed buildings to the south of the site along Highshore Road (e.g. no. 8-14 Highshore Road and Post Office Depot) and on Peckham Road (e.g. no. 58 Peckham High Street).	Noted. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.
208	154	5.2-Stes for major development;		10	Former Tuke School Following issues need to be addressed: · In the site details reference should be made to proximity of a variety of listed buildings to the west of the site along Consort Road Peckham High Street.	Noted. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.
209	154	5.2-Stes for major development;		10	Cator Street/Commercial Way Following issues need to be addressed: · The figure lacks details of suggested building heights on the building blocks	Noted. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.
210	154	5.2-Stes for major development;		11	Land at south of Summer Road (Flaxyards site) Following issues need to be addressed: · Under Key opportunities reference should be made to the opportunity for taller buildings as figure 38 suggest 7 storey blocks. · This site has not been identified in the text of policy 31 as an appropriate named location for taller buildings. This inconsistency should be rectified, and supported by robust evidence for its inclusion.	Noted. This site is no longer identified as being suitable for a tall building. The diagram has been amended. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.

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211	154	5.2-Stes for major development;		12	Peckham Square/Eagle Wharf Following issues need to be addressed: · In the site details reference should be made to the potential of the site falling within the proposed Peckham Hill Street Conservation Area. In addition reference should be to the proximity of a variety of listed buildings to the north east of the site along Peckham Hill Street.	Noted. We have added a reference to the site being within the Rye Lane Peckham conservation area and the Peckham Hill Street conservation area. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.
212	154	5.2-Stes for major development;		13	Choumert Grove Car Park Following issues need to be addressed: · In the site details reference should be made to the potential of the site falling within the proposed Rye Lane Conservation Area. · The figure lacks details of suggested building heights on the building blocks.	This site has been removed as a proposals site.
213	154	5.2-Stes for major development;		14	Choumert Grove Car Park Following issues need to be addressed: · In the site details reference should be made to proximity of Holly Grove Conservation Area	This site has been removed as a proposals site. Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors.
214	154	5.2-Stes for major development;		15	Nunhead housing site (previously Nunhead Community Centre site) Following issues need to be addressed: · In the site details reference should be made to site falling within the Nunhead Green Conservation Area	Noted. We have added a reference to this site being in the Nunhead Green Conservation Area. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.
215	154	5.2-Stes for major development;		16	Nunhead housing site (previously Nunhead Early Years Centre) Following issues need to be addressed: · In the site details reference should be made to site falling within the Nunhead Green Conservation Area.	Noted. We have added a reference to this site being in the Nunhead Green Conservation Area. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.
216	154	5.2-Stes for major development;		18	151-161 Gordon Road Following issues need to be addressed: · In the site details reference should be made to site falling within the Nunhead Green Conservation Area.	Noted. We have added a reference to this site being in the Nunhead Green Conservation Area. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.
217	154	5.2-Stes for major development;		20	107-119 and 122-148 Ivydale Road Following issues need to be addressed: · In the site details reference should be made to proximity of Holly Nunhead Cemetery Conservation Area and Nunhead Cemetery Registered Park and Garden (grade II*).	Noted. We have added a reference to this site being in the Nunhead Cemetery Conservation Area. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.
218	154	5.2-Stes for major development;		24	Former Kennedy Sausage Factory Following issues need to be addressed: · Reference should be made to the proximity of the Former Peckham Fire Station (grade II listed building) to the north of the site.	Noted. We will include more site specific details at the next stage. Our assessments of capacity took the surrounding areas into account including the setting of conservation areas and listed buildings etc.
219	154	6-Delivering working together to make it happen			It is noted that the next stage of consultation will provide clear guidance on the use of section 106 planning obligations. We would urge you to include the opportunity to invest in the areas heritage assets, as part of delivering key infrastructure and mitigating the impact of development. To help ensure this, we would suggest that the historic environment is explicitly identified say through public realm improvements, new and updated transport infrastructure, open space provision and enhancement, and development designs.	At the next stage, section 7 of the AAP will be expanded to provide more detail on S106 and CIL.
220	154	Other			Appendix C Link to the Core Strategy and saved Southwark Plan Policies The list provided does not make any reference to policies 30-33 in terms of their relationship with Southwark's Core Strategy and saved Southwark Plan Policies. This needs to be shown.	This section has been updated in the Preferred Option document.
221	154	2-Peckham and Nunhead			Non technical Summary Section 2 – Under the what sustainability issues are relevant to the area, the broad heading of built heritage and archaeological environment is welcomed. However the supporting information is poor in that it focuses only upon archaeological matters and makes no reference to other heritage assets. This should be addressed.	This has been amended in current version of the sustainability appraisal.

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222	154	3-Vision and objectives			Nontechnical Summary Section 3 – In the Growth dependant options matrix it is noted with interest that the impact of scale of development - high growth is 'uncertain'. Yet at low and limited growth levels it considered that the impact would be neutral. How were these conclusions made and does the 'uncertain' comment reflect the need for further detailed analysis in order to clarify impact upon the historic environment. If so, then further work needs to be undertaken to clarify these points of uncertain	This is a summary of the appraisal undertaken at the issues and options stage. It was considered that the impact of the 'growth dependant' option would require further testing before the implication on heritage could be determined. This is being undertaken through the development of the AAP and further testing through the SA.
223	154				Summary Baseline Information Para 4.2.3 - The built environment – The detail provided is incomplete in that not all heritage assets are recognised and valued. This includes the areas Registered Parks and Gardens and locally listed buildings. In addition the AAP highlights the potential for new designations. Again these are not recognised in the baseline	This has been amended in current version of the sustainability appraisal.
224	154				Sustainability Issues The reference to the historic environment is weak in its content and intention. It needs to consider the value of the areas heritage assets as sustainability issue and the threats it faces from inappropriate change. However it can provide an opportunity for positive change if used as a catalyst for regeneration	This has been amended in current version of the sustainability appraisal.
225	154				Sustainability Issues No reference is made to the potential harm to the historic environment that may happen due to existing pressures. For example the pressure for change, unless managed responsively to the existing local and historic context could cause harm to the areas heritage assets.	This has been amended in current version of the sustainability appraisal.
226	154				What are the significant negative effects of the plan Uncertain impacts – It is with concern that a number of heritage issues are scored as 'uncertain' with the text suggesting that impacts could be mitigated against through design management. We would suggest that this is a poor justification and that the SA should be more robust in identifying how the policies of the AAP will impact upon the historic environment. For example policy 31 scored positively with regards to its impact upon the historic environment. However without detailed evidence to support the location of tall buildings how can this scoring be justified? Especially when some of the sites will impact directly heritage assets (i.e. sited within existing or proposed conservation areas or within the setting of a range of heritage assets).	Uncertain impacts have been identified in relation to heritage as the scale, type and location of development has yet to be determined. We have prepared a characterisation study to help us determine the impact of development on heritage assets and their setting, Further information is also set out in our conservation area appraisals and in the detailed policies of the AAP, include policy 23 public realm, policy 24, built form, policy 25 building heights and policy 26, heritage. This will be developed further through the preparation of the AAP.
228	523			2	I find it difficult to know which comment to start on, so I will not try to prioritise them: I would like to see the multi storey car park and cinema retained at all costs. This seems to be the first venue that is attracting visitors from North of the river. This is a seed for regeneration. It seems crazy to entertain the idea of knocking it, and the cinema down, only to build a new cinema elsewhere in the area. I would suggest allowing independent retailers the opportunity to construct small outlets or workshops within the bays, and charge them a small rent for the space, which would increase after a five year period. The council would be responsible for putting in services such as shared toilets and electricity supply, which would be individually metered. I understand that you are looking to 'increase retail and business floorspace'. This would be a very cheap way to do it.	The AAP acknowledges that this is a key site in the town centre. The site guidance recognises that the site is not reaching its potential in terms of design or its use. Our car parking study recognises that this car park is currently under used. If the site is redeveloped, it could provide a significant opportunity in this part of the town centre by making better use of the space, providing range of new uses, improving its connection to Rye Lane, providing a new street frontage, raising the profile of the building on the high street.
229	523	3.3.4-Nunhead town centre			I am very disappointed at the look of the new shop fronts in Nunhead. This must be at great expense to the council, and at a time when the Nunhead library may be under threat. Why are they all the same. Surely the best thing about independent high streets is the eclectic nature of the shops, both internally and externally.	The Preferred Option includes a policy on built form (Policy 24) which specifically refers to shop front design.
230	523	5.2-Sites for major development;		15	I am disappointed to hear that the community centre is earmarked for demolition. I don't understand the logic in knocking something down, only to rebuild it , to a lesser standard, elsewhere. (St Mary's Church being a prime example). More should be done to utilise what is already there.	The existing community centre was closed due to health reasons and therefore a new one is required in the area.
231	523		Policy 10		I am deeply saddened to see so many pubs being demolished and replaced by cheap housing. There are too many community buildings being lost as it is. These pubs are our heritage, the corner stones of many communities, and it seems to me that we shall only regret losing so many. More should be done to conserve these buildings.	Our Preferred Option policy 3 sets out we will protect individual shops where there are no similar shops in the nearby area. This continues our current approach set out in Saved Southwark Plan Policy 1.10.
232	523		Policy 2		I agree that more should be done to increase the nightlife around Rye Lane. There are too	We have set out in our Preferred Option policy 2 that we will promote the

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					many of the same thing. It is true that Rye Lane is a vibrant, busy street though, so changing the nature of the High Street may drive many of these people away. If people are wanting a gentrified high street, send them to East Dulwich. There has to be something for everyone. Chain stores should be resisted at all costs. NO MORE TESCOS.	provision of more cafes and restaurants, leisure and entertainment uses to help make Peckham a better place to go out in the evening. We also want to promote more arts/cultural uses in the area to build on Peckham's reputation as a creative hotspot in London and to help generate new jobs and contribute to the vitality and variety of the town centre. The Preferred Option policy 1 sets out that the objective for Rye Lane's existing retail parades is to strengthen them by promoting and maintaining a balance of different uses, to help improve the shopping environment. We want to increase the versatility of the retail offer in the area and we know through our evidence gathering that there is scope to improve comparison goods shops (clothes, books, shoes, household goods etc).
233	523		Policy 30		You say that you are to 'ensure new development is built to the highest quality'. I would have hoped that this was always on your agenda. However, having seen the blue rendered residential development by BPTW on Queen's Road, I suspect this has not been the case. How can we ensure that no more eyesores like this are constructed in the area? I see Peckham as the new Hoxton. Please take a look at the quality of the flats being constructed there before allowing any more carbuncles by BPTW to be erected here. These developments will set the scene for many years to come. Please don't allow the Peckham scene to be 'cheap and nasty'.	Core Strategy strategic policy 12 says that development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in. We also have the following policies in the Saved Southwark Plan: Policy 3.12 – Quality in Design Policy 3.13 – Urban Design Policy 3.14 – Designing Out Crime Policy 3.15 – Conservation of the Historic Environment Policy 3.16 - Conservation Areas Policy 3.17 - Listed Buildings Policy 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites Policy 3. 20 – Tall Buildings Policy 3.22 - Important Local Views Our Residential design standards SPD provides further detailed guidance on how new housing development should meet the design standards set out in the Core Strategy. Policy 23: Public Realm and Policy 24: Built Form set out how we ensure the high quality design of buildings and spaces will be required to meet the highest possible design standards, in line with our Core Strategy. We have also included specific site guidance for our proposals sites in Section 6 of the AAP: Sites in Peckham and Nunhead and Appendix A: Schedule of proposals sites. Section 5 of the Preferred option AAP includes five new character area visions setting out the character, opportunities and policies for each. These policies show how we will ensure that new development in Peckham and Nunhead is of the highest design whilst being appropriate to context and character.
234	523		Policy 18		I am all for removing all one way systems for traffic. I think these roads kill any pedestrian and retail activity.	Support noted. Key road network improvements are now set out for the individual character areas in Section 5.
235	523		Policy 21		There is a good example of new housing working well and creating good community space just East of Rye Lane. There is a pedestrian square created that is well used by the residents, and welcoming to outsiders. Each house has a small garden facing onto the square. All parking is out side the square. I have been designing and working on large residential blocks for a good proportion of my career, and have seen what works and what doesn't. The scheme I cite is quite low density, but could easily be increased by placing flats on top of each house, with a garden facing the square, on top of part of the roof of the house below. I would very much like to see this kind of development adopted at Woodene and other redevelopment sites. Does the council have architect consultants? I would very much like to be involved in the design of my local environment.	The Council disposes of the majority of the sites it owns and they are then developed by developers. The Council does not have its own architects
236	137		Policy 19		All of the preferred options seem inappropriate as they all serve to make the regeneration of the town centre dependent upon increased access by private car. As the preferred options report sets out, the existing provision of car parking in the town centre is more than 200% of the existing level of demand and the existing multi-storey car park has 10 times the number of parking spaces required for the existing level of demand. Despite this, all three options involve maintaining the existing levels of car parking, and option 2 even involves developing a new town centre car park. All of the options therefore only make any sense if the planned increased economic activity in the town centre is proposed to be very largely car dependent. Southwark Living Streets submits that this approach is completely inappropriate and will result in a worsening of the attractiveness of the town centre as it	We are committed to improving sustainable transport options throughout Peckham and Nunhead, reducing the volume of traffic and improving the functioning of the road network. We will work with Transport for London, transport operators and other partners to improve public transport and we will improve the broader environment to make walking and cycling and other forms of active travel more attractive and safer. These priorities are set out in the Core Strategy and in the Transport Plan. Policy 11 states that we will promote active travel throughout the action plan area and work with partners to provide a high quality network of routes. The policy sets out our broad priorities and further detail is provided in Section 5 of the AAP, with respect to the individual character areas.

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					becomes even more clogged with motor vehicle traffic. A much better approach would be to base the revitalization of the town centre on a model for growth that frees the town centre from traffic congestion and the inevitable associated delays, pollution and noise, and instead promotes walking, cycling and public transport as the quickest and most convenient ways to access the centre through the provision of a high quality public realm and excellent cycling and public transport facilities.	Improvements will be pursued through a number of ways, including via the Transport Plan and through using s106 funding. Policy 14 sets out that our preferred approach to town centre car parking is to consolidate spaces by developing the Cerise road/cinema car park and Copeland road car park. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. There are no initial plans to create additional car parking, but this will be monitored over the lifetime of the document. Any new development will be required to comply with the maximum parking standards set out in Appendix 15 of the Southwark Plan and in the London Plan.
237	137		Policy 20		The core area Southwark Living Streets strongly supports option 1 (Car free development). It is inappropriate for housing in the core area to be constructed so as to encourage car use when this area has exceptionally good public transport links, as the explanatory text to the policy rightly sets out. Option 2 (Development with car parking) would not promote the policy's and the Area Action Plan's aims.	Core Strategy strategic policy 2 establishes our commitment to promoting sustainable transport throughout the borough. Our preferred approach for residential car parking is consistent with this aim. Policy 15 sets out that we will encourage car free residential development in Peckham core action area, but allow schemes to include up to 0.3 spaces per unit where this level of parking can be justified through a transport assessment. As exceptions to this rule, we will allow disabled car parking and car club spaces to be provided.
238	137		Policy 20		The wider action area The levels of car parking proposed as the preferred option are excessive, would encourage inappropriately high levels of car use in an already congested urban area and would not be in conformity with the Mayor of London's recently published London Plan. This sets out (policy 6.13: "Parking", pp. 200–201) that:— aThe maximum standards set out in Table 6.2 in the Parking Addendum should be used to set standards in DPDs. bin locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people) Table 6.2: "Car Parking Standards" (pp. 204–205) provides that the maximum residential parking standards across London are:— 1–2 beds: less than 1 parking space per unit 3 beds: 1–1.5 parking spaces per unit 4 or more beds:1.5–2 parking spaces per unit And the note to the table sets out that "All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit". The Area Action Plan's proposed parking standards of a maximum of 1 space per unit in the urban zone and 1.5–2 spaces per unit in the suburban zone are not in conformity with this London Plan policy. Given Peckham's and Nunhead's central location within Inner London, it should be expected that the London-wide standards set out in the London Plan and applicable to Outer London locations with poor public transport connectivity would be the very highest levels of car parking that should be permitted; and that usually much lower levels of car parking will be appropriate in Southwark. Southwark Living Streets submits that car parking levels in the Area Action Plan be amended to conform to the London Plan and to encourage the use of sustainable transport by requiring car-free development in the urban zone and allowing only the amounts of car parking set out in Table 6.2 of the London Plan in the suburban zone (either by way of a cross-reference, which should be sufficient given that the London Plan forms a key part of the development plan for Southwark, or by restating the standards in the Area Action Plan if this is felt necessary for ease of reference).	Core Strategy strategic policy 2 establishes our commitment to promoting sustainable transport throughout the borough. The proposed guidance on residential car parking is consistent with this aim. The standards proposed are the same as those in the adopted Southwark Plan. Policy 15 in the AAP encourages car free residential development in Peckham core action area (with the exception of disabled parking and car club spaces), but allows some limited provision in the urban and suburban zones. This recognises that these areas are more remote from public transport than the core action area. These standards are compatible with those in Table 6.2 of the London Plan, which are based on the size of unit rather than public transport accessibility. Should a conflict arise as a result of future revisions to the London Plan or associated SPG then we will revise our standards accordingly.
239	512		Policy 30		Dear Southwark In addition to my earlier email 21/9/11 about this issue of building redevelopment in Nunhead particularly, when i was referring particularly to the area where i live very much affected by the redevelopment of the old Community Centre site (15) and the Early Years Centre site (16) please refer urgently to your statements in Section 4 pages 87 and 88, about 'Nunhead Town Centre' - Policy 30: 'requiring development to be low scale 2-4 storeys' 'Using heritage as a historic asset' 'to retain the current character of places with new development being similar to existing heights' ie Site 15 where existing heights are 2 storey Site 16 where existing sites are 2 storey and 3 storey absolute	This is addressed in Appendix A of the AAP: Schedule of proposals sites. Please refer to: PNAAP 11: Nunhead housing site (Previously Nunhead Community centre site) PNAAP 12: Nunhead community centre and housing (Formerly Nunhead Early Years Centre) Section 5 of the Preferred option AAP includes five new character area visions setting out the character, opportunities and policies for each. Section 5.3 Nunhead, Peckham Rye and Honor Oak has area-specific policies which have been prepared. They cover: • Policy 31: Land use • Policy 32: Transport and movement • Policy 33: Built Environment – public realm and

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					maximum	built form • Policy 34: Natural Environment These policies show how we will ensure that new development in Peckham and Nunhead is of the highest design whilst being appropriate to context and character.
240	512		Policy 31		Policy 31 'requiring development of 2-4 storeys in the peckham and Nunhead action areas' (note that the higher 'gateway' blocks are not listed as being in Nunhead. I am sure there are many more referrals to these statements under different guise but these are clear enough statements made by yourselves.	The preferred option does not allow for higher blocks in Nunhead. Section 5 of the Preferred option AAP includes five new character area visions setting out the character, opportunities and policies for each. Section 5.3 Nunhead, Peckham Rye and Honor Oak has area-specific policies which set out that development should relate to existing building heights which are predominately 2-4 storeys. Our view is that 6-10 storeys the most appropriate height for a tall building on this site. This is based on evidence that we have collected so far, including the Conservation Area Appraisal for Rye Lane Peckham, as well as the Characterisation Study. The characterisation study examines and analyses the make-up of the AAP area, its historic context and makes recommendations for future townscape opportunities, including the potential location of taller buildings. The methodology and approach used in this piece of work has informed our policies in the AAP and the characterisation study will be published as part of the evidence base for the preferred option. We will also be publishing a Tall buildings study as a further piece of evidence base work at the publications/submission stage of the AAP.
241	127		Policy 21		Thank you for consulting Thames Water regarding the above. As you will be aware, Thames Water is the statutory sewerage and water undertaker for the London Borough of Southwark and provided comments at the Issues and Options Consultation stage. Since the issues and options consultation was undertaken the Core Strategy for Southwark has been adopted setting out strategic policies for the Borough. Under Section 6.10 of the Core Strategy it is stated that: "New development in the borough needs to be supported by adequate infrastructure. This includes social infrastructure such as schools, health, facilities for the emergency services, including the police, other community facilities, transport infrastructure, green infrastructure such as parks and open spaces, and energy, telecoms and utilities infrastructure. Where infrastructure is needed to support development, it should be provided along side it and development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development." The officers response to our comments on water and wastewater infrastructure raised at the issues and options consultation stage was that: "The research does not demonstrate that there are any additional issues for Peckham or Nunhead. We are very keen to know if there are any additional issues so that we can include them in the implementation plan at the preferred options stage." Having reviewed the details of the proposed development sites we have the following comments to make with respect to the current consultation document. General Comments We have reviewed the development sites set out in the consultation document and provided comments on the water and wastewater infrastructure issues for each site. A table containing our comments is attached below. We have concerns regarding the water supply capabilities for a number of the sites which will require further investigations to establish whether any upgrades to the existing infrastructure are required. Where upgrades are required it will be essential for these upgrades to be delivered ahead of the occupation of development in order to avoid problems such as low/no water pressure and sewer flooding. For the sites where concerns have been raised it is noted that the developments are outlined to come forward in years 0 to 5. Should more detailed investigations demonstrate that infrastructure upgrades are required it may be necessary to adjust the phasing of the developments to ensure that there are no adverse impacts on new existing or new users. In view of the concerns regarding some of the sites and the requirement in the Core Strategy for infrastructure to be provided alongside development it is considered that additional text should be included in the area action plan to ensure that developers work with Thames Water to secure the delivery of water and wastewater infrastructure required to support the development. We	Noted. Detailed comments are set out in response to each representation below.

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					therefore suggest the following changes and additional text are included in the preferred options version of the DPD:	
242	127		Policy 21		The last bullet point should be revised to read "Making sure that the necessary infrastructure, including utilities infrastructure, is delivered ahead of the occupation of development" The following additional text should also be provided in support of Policy 21: "Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure. Where upgrades are required developers will need to agree with Thames Water how these will be funded and when they will be delivered."	We have provided more detail in Section 7 of the AAP on implementation and the issues associated with increasing the amount of development in the area. Details regarding utilities infrastructure would be more suitable in that section. We will be adding more detail to Section 7 at the next stage of consultation, including the preparation of an infrastructure plan
243	127			20	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
244	127			17	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
245	127			10	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations of the impact of the development and completion of this will take several weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan Document. "Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure." On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Development covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted. We will add more detailed site information at the next stage. We will also prepare an infrastructure plan which will identify key infrastructure requirements which will be needed to support the growth in the area.
246	127			14	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
247	127			2	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
248	127			8	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations of the impact of the development and completion of this will take several weeks. It should be	Noted. We will add more detailed site information at the next stage. We will also prepare an infrastructure plan which will identify key infrastructure requirements which will be needed to support the growth in the area.

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					noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan Document. "Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure." On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Development covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	
249	127			4	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations of the impact of the development and completion of this will take several weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan Document. "Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure." On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Development covers a large area, currently served by combined sewers. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted. We will add more detailed site information at the next stage. We will also prepare an infrastructure plan which will identify key infrastructure requirements which will be needed to support the growth in the area.
250	127			9	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations of the impact of the development and completion of this will take several weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan Document. "Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure." On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Development covers an area, currently served by combined sewers. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted. We will add more detailed site information at the next stage. We will also prepare an infrastructure plan which will identify key infrastructure requirements which will be needed to support the growth in the area.
251	127			11	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations of the impact of the development and completion of this will take several weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan Document. "Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development	Noted. We will add more detailed site information at the next stage. We will also prepare an infrastructure plan which will identify key infrastructure requirements which will be needed to support the growth in the area.

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					will lead to overloading of existing water infrastructure." On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Development covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	
252	127			3	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Development covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection therefore it is recommended that the proposed development drains to the combined sewer on Rye Lane to the West of the site. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
253	127			15	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
254	127			6	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Development covers an area, currently served by combined sewers. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
255	127			12	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
256	127			1	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations of the impact of the development and completion of this will take several weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan Document. "Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure." On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Development covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted. We will add more detailed site information at the next stage. We will also prepare an infrastructure plan which will identify key infrastructure requirements which will be needed to support the growth in the area.
257	127			16	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
258	127			18	On the information available to date we do not envisage infrastructure concerns regarding	Noted

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Representation Ref	Object or Ref	Section	Main Policy	Development sites	Details of Representation	Officer Response to Representation
					Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	
259	127			5	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations of the impact of the development and completion of this will take several weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan Document. "Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure." On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Development covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection therefore it is recommended that flows from the proposed site are drained to the combined sewer to the West of the site on Meeting House Lane. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted. We will add more detailed site information at the next stage. We will also prepare an infrastructure plan which will identify key infrastructure requirements which will be needed to support the growth in the area.
260	127			7	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Development covers a large area, currently served by combined sewers. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
261	127			13	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
262	127			19	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site". On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	Noted
263	214	3-Vision and objectives			Thank you for consulting the Mayor on the above document. They Mayor has afforded me delegated authiirty to make comments on his behalf. As you are aware all local development documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. I welcome the production of the Area Action Plan (AAP) for Peckham and Nunhead and support the Council's vision for these areas. A detailed response on the AAP will be provided at the preferred options stage when the detailed policy proposals can be accurately evaluated against the policies of the London Plan. I note that since publication of the document there have been changes to national planning policy and that the London Plan (2011) has been published and trust that you will revise the document accordingly. Transport for London (TfL) has provided some initial comments which are attached at Appendix One. The comments provided are not exhaustive are made entirely without prejudice to any future Mayoral comment or decision. My officers are keen to work with you and your officers to ensure that London Plan policy is reflected throughout the document as it progresses from preparation to adoption.	Noted.

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Representation Ref	Object or Ref	Section	Main Policy	Development sites	Details of Representation	Officer Response to Representation
264	214		Policy 15		TfL support this policy but suggest that the third bullet point is re-worded as 'requiring new development to contribute towards strategic and local transport improvements...' Cycle superhighway 5 (Lewisham to Victoria) is set to be launched in 2013. TfL welcomes Southwark's support for Cycle Hire, though there are no plans at this stage to extend the scheme into southeast London. TfL considers that only the uppermost part of Peckham (namely from the A202 Peckham Road/Peckham High Street/Queens Road and northwards) within the AAP area is suitable for Cycle Hire. Each site will need to be assessed on its individual merits including location characteristics, land ownership and funding. TfL requests that no direct reference is made to extending the cycle hire scheme to Nunhead as this is not a committed expansion.	Support noted. We have amended the policy to refer to strategic and local transport improvements, which is consistent with our existing approach, as set out in our section 106 planning obligations SPD. The AAP has made clear through policy 11, that whilst we support the expansion of the cycle hire scheme, there are currently no plans to expand the scheme into Peckham and Nunhead. However, as a council we wish to continue lobbying for an extension to the cycle hire scheme, as set out in policy 11.
265	214		Policy 17		TfL suggest that these options should be expanded to include safeguarding for a wider range of Public Transport. Including explicit reference to bus standing and layover space (as required by the GLA's land for transport SPD).	The overarching Core Strategy policy 2 refers more generally to safeguarding land for planned public transport improvements where the need is likely to arise in the future. AAP policy 12 includes scope for an alternative high quality public transport service to link Peckham with North London. This approach complies with the London Plan and GLA's land for transport SPD.
266	214		Policy 18		Improvements to the strategic highway network (SRN, TLRN) should be subject to detailed modelling in consultation with TfL, in particular where this relates to signals.	We will work with TfL, the Highways Agency and other organisations, as appropriate, when carrying out improvements to the strategic highway network
267	214		Policy 20		TfL support both options. A ratio of 0.3 parking spaces per dwelling is welcomed.	Support noted. Our preferred approach is to encourage car free residential development in Peckham core action area, but to allow up to 0.3 parking spaces per dwelling where this can be justified through a transport assessment. Disabled parking and car club spaces will be treated as exceptions to this rule and more generous car parking will be allowed in the urban and suburban zones. This approach is now set out in AAP policy 15.
268	214		Policy 27		TfL suggest that explanation description of disabled car parking provision is provided which reflects in the London Plan.	The detailed explanation of wheelchair housing is set out within our Residential Design Standards SPD. The AAP also includes a policy (15) on residential parking standards.
269	214	5.1- Existing Proposed sites			Peckham Rye Station Additional opportunities to improve and enhance the station and station facilities should be investigated and funding secured accordingly	The station is designated as a proposals site in the AAP - PNAAP 6 - which recognises the need to improve the station and the surrounding area. We have also received funding from the Mayor's Regeneration Fund to improve the space in front of the station.
270	214	5.1- Existing Proposed sites			Copeland Road bus garage TfL welcome the reduction in size of this development site and that it no longer includes developing the bus garage site.	noted
271	214			11	TfL currently has no plans to re-visit the CRT project. However, it is appreciated that the CRT or alternative high quality public transport service to Peckham with North London is a key aspiration of the Council. Sites such as the Sumner Road (Flax Yard site) do offer an opportunity to support such a link.	Support noted.
272	532	5.2-Sites for major development;		14	Please do not take away our only bit of open space. I would like to think the Council has enough guts and resources to stand up to developers and give the local people what they want.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and

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						protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
273	143				Thank you for consulting the Environment Agency on the above. We are pleased to note that our comments from the previous representation have been taken into consideration. We would wish to comment on the following: • Flood Risk • Water Resources Flood Risk The key flooding issue for this Area Action Plan will be drainage of surface water. The development in this area should provide an opportunity to improve drainage, thereby reducing surface water runoff and reducing flood risk both locally and the surrounding areas. Redevelopments should make space for Sustainable Drainage Systems (SUDS) which can be used to attenuate surface water runoff while achieving additional benefits such as enhanced amenity space and biodiversity.	Noted. Policy 21 of the AAP sets out our policy on waste, water, flooding and pollution. This includes requiring developments to help reduce flood risk by reducing water run-off and using sustainable urban drainage systems.
274	143	5.2-Stes for major develop ment;			There are no specific site allocation comments, as the issues at all sites are similar, with key issues relating to surface water rather than fluvial or tidal flood risk. Sections of the old Surrey Canal run through/near this area. No known proposed flood defence schemes will impact on this area. The old canal could be opened up and used as an attenuation feature to contribute to offsite surface water attenuation (Sites 11, 12 & 30). Our maps show a short and un named or classified ditch running between ponds in Peckham Rye Park. Such a feature may be an opportunity for river restoration and enhanced biodiversity.	Noted
275	143		Policy 30		Many of the redevelopment sites include space for private amenity opportunities. These spaces could utilise permeable paving with sub base storage along with surface features such as swales, linear ponds etc for attenuation. New buildings could be structurally designed to incorporate intensive green roofs where possible to maximise the benefits of green roofs. Alternatively, extensive green roofs could be retro fitted to refurbished buildings or added to new buildings.	This is addressed in the Preferred Option Policy 23 – Public Realm. New public realm, public realm improvements and public realm delivered as part of a development should incorporate environmentally positive initiatives such as Sustainable Urban Drainage systems (SUDs), permeable paving and green walls. This is also covered Saved Southwark Plan Policy 3.13 – Urban Design and in the Sustainable Design and Construction Supplementary Planning Document 2009. We will look at this issue further in our forthcoming borough-wide Development Management DPD.
276	143	4-The preferred options/ options	Policy 28		Surface water Flooding We note that paragraph 4.5 Theme 5 - Environment: Sustainable use of resources does not include surface water management. On page 31 on the same theme, flood risk is included as part of the objective: 'To reduce the impact of development on the environment and help tackle climate change, air quality, pollution, waste and flood risk'. As we had requested in our response to previous consultation, there is need to address surface water flooding in more detail. The Southwark Strategic Flood Risk Assessment (SFRA) acknowledges that given the heavily urbanised character of much of the borough, it is inevitable that localised flooding problems arising from under capacity drainage and/or sewer systems will occur, particularly given the mounting pressure placed upon ageing systems as a result of climate change. Furthermore, sewer systems are generally designed (in accordance with current Government guidance) to cater for the 1 in 30 year storm, and highway soakaways are generally designed for only 1 in 10 year storms. Storms over and above these design events will exceed the drainage system, resulting in overland flow, often in an uncontrolled manner, resulting in localised flooding. As a Lead Local Flood Authority Southwark Council has been allocated nearly £1.5m by DEFRA to help prepare the borough against flooding from surface water run off. The money will go towards understanding and preparing for surface water flooding, which occurs when heavy rainfall overwhelms the drainage capacity of the local area. The publication of Environment Agency maps, that show which areas are more susceptible, will allow both residents and authorities to prepare as best as possible. Although relatively few localised flooding incidents have been observed in recent years, any location within the borough may be susceptible to localised flooding, irrespective of whether or not they have flooded in the past. For example on 27 April 2004, severe rainfall in the south of the borough caused extensive surface water flooding which inflicted considerable damage on residents and their homes, public services and private businesses in the Dulwich area. Nearly all the flooding occurred south of East Dulwich Road and Lordship Lane. Flooding	We have included a policy on waste, water flooding and pollution in the preferred option AAP (policy 21). This policy sets out how we will identify areas that are at higher risk of surface water flooding and reduce this risk through measures set out in the Council's Surface Water Management Plan.

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					was attributed to the intensity of the rainstorm (with a reported probability of less than 0.3% (1 in 300) in any year) and the topography of the area, causing runoff to accumulate in a natural valley, and the Thames Water sewer system serving the area to surcharge. Another contributory factor was blockage of the gullies. However improved gratings have now been installed by the Council.	
277	143				Water Resources Sustainability Options We are please to see reference to the Water Framework Directive in the Interim Sustainability Appraisal Report and support SDO 9 -To reduce the use of water, source water as locally as possible and protect water quality The Environment Agency has published River Basin Management Plans that identify measures that will achieve WFD requirements for all water bodies in England and Wales. Regulation 17 of the Water Environment (WFD)(E&W) Regulations 2003 places a duty on each public body including local planning authorities to 'have regard to' river basin management plans. Our approach will be to work in partnership with the London Borough of Southwark to: <ul style="list-style-type: none"> • identify when there might be impacts on water bodies; • seek options that reduce impacts on water bodies; • assess the risk of deterioration or failing to improve water bodies; • require all practicable mitigation. 	Support noted.
278	143		Policy 30		Water Demand Management Rainwater harvesting can be a useful means of enhancing water supplies and reducing the demand on water resources. Rainwater harvesting also has the potential to contribute to the improved management of surface water run-off. However, we consider that: <ul style="list-style-type: none"> •each proposal should be examined on a case by case basis. •the effectiveness of rainwater harvesting schemes varies considerably and depends on the sector and scale. •simple water efficiency measures should always be considered before rainwater harvesting. An overview of our position on Rainwater Harvesting can be found at http://publications.environment-agency.gov.uk/PDF/GEHO0611BTYB-E-E.pdf SDO 10 To maintain and enhance the soil quality Historical Land Use We would encourage the London Borough of Southwark to address risks to controlled waters (groundwater's and surface waters) from historical contamination in the Peckham and Nunhead area, following the requirements of PPS23 and the Environment Agency Guiding Principles for Land Contamination.	We have included a policy on waste, water flooding and pollution in the preferred option AAP (policy 21). This policy sets out how we will identify areas that are at higher risk of surface water flooding and reduce this risk through measures set out in the Council's Surface Water Management Plan. Our sustainable design and construction SPD provides further guidance on how new development should reduce water and waste consumption and meet the environmental standards set out in the Core Strategy.
279	162	Other			Thank you for your email on 8 July 2011 inviting the Highways Agency (HA) to comment on the Peckham and Nunhead Area Action Plan and The Affordable Housing Supplementary Planning Document consultations. The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary for State for Transport. We have reviewed the consultation documents and do not have any comments at this stage.	Noted
280	209		Policy 13		We welcome and support many of the proposals in the Peckham and Nunhead Area Action Plan. The AAP offers an opportunity to ensure that the built environment promotes health and reduces inequalities for the local population in a sustainable way which will improve physical and mental health over time. The Marmot review, a major independent review into health inequalities in England commissioned by the Secretary of State for Health looked at the contribution that spatial planning could make to improving population health and evaluated the best available evidence. It recommends prioritising policies and interventions that both reduce health inequalities and mitigate climate change by: <ul style="list-style-type: none"> o Improving active travel o Improving good quality open and green spaces o Improving the quality of food in local areas o Improving the energy efficiency of housing The report also advocates integrating planning, transport, housing, environmental and health systems to address the social determinants of health in each locality and supporting locally developed and evidence-based community regeneration programmes that: <ul style="list-style-type: none"> o Remove barriers to community participation and action o Reduce social isolation Many aspects of the AAP do have then potential to do this. The following comments seek to improve the quality of the evidence base of the plan and also to draw attention to components of the plan where	<p>1. Support noted.</p> <p>2. Support noted. The Preferred Options policy 4 (Hot Food Takeaways) has taken forward a combination of options 1 and 2 from the Towards a Preferred Options that we will restrict further growth of A5 use. This includes the two approaches of establishing a 400m exclusion zone around secondary schools and limiting the number of hot food takeaways to 5% and also preventing clustering of A5 units in Peckham and Nunhead town centre protected shopping frontages.</p> <p>3.Support noted</p> <p>4.Support noted. We have prepared a draft Open Spaces Strateg and it is currently out for consultation. It will become part of the evidence base at the next stage of the preparation of the AAP. The draft Strategy promotes increased accessibility to open spaces and also recommends that local communities need</p>

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					<p>there may be an adverse impact on health. In summary: 1.Proposals to promote active travel (e.g. cycling routes and improved pedestrian routes) are strongly supported. 2.Options 1 and 2 to restrict hot food takeaways are strongly supported. Option 3 is considered insufficient. 3.Expanding the retail offer is supported. 4.Protecting, enhancing and improving access to open green space for a variety of recreational use including growing schemes is strongly supported. Consideration needs to be given to ensuing 'boundary' and 'disputed' open spaces are cared for as increasingly there is a wider range of organisational owners involved (different social housing agencies, LA and private managed housing estates). 5.The development of a cultural and evening economy is welcomed but careful consideration must be given to addressing potential noise, nuisance and litter problems. 6.While the requirement for more housing is recognised, further consideration needs to be given to the impact of density and increased population on: - Transportation -Unregulated or difficult to regulate HMOs and buy to lets, including deterioration of uncared for housing -Population churn and community cohesion References Marmot Review Team (2010) Fair Society, Healthy Lives available at: http://www.marmotreview.org/</p>	<p>to be involved in the planning, designing and management of local open spaces. With regard to encouraging the use of community gardens, the Strategy recommends development guidelines are established for community groups looking to use Council owned land for community gardens and other food growing initiatives.</p> <p>5. Support noted. Our saved Southwark Plan policy 1.7- Development within Town Centres is used to assess new uses in town centres and proposals must demonstrate that they will not materially harm the amenities of surrounding occupiers and it would not harm the vitality and viability of the centre.</p> <p>6. The Preferred Option policies on transport support enhancements to the network and services in order to address current issues and also to accommodate the anticipated growth in the area. We also have addressed delivery and implementation of infrastructure in the Preferred Options section</p> <p>7. We have identified in the Preferred Options that existing infrastructure will need to be improved and new infrastructure provided to cope with the additional population and visitors. We already have plans and funding for some of these infrastructure projects such as the extension to the Overground but for other projects we need to carry out more work to assess the needs of Peckham and Nunhead and how this will be funded. At the next stage of consultation in September 2012 we will set out a schedule of new or improved infrastructure proposals, funding mechanisms and timings. Our vision for the area is to promote a more successful place where people want will want to live, work and visit and which includes good housing, safe and attractive public realm, good connections, successful schools, shops, health and leisure facilities. We have not set out policies on regulation of HMOs or buy-to-lets, however our objectives in the AAP will help to strengthen the characteristics of the local community and promote growth including maximising housing choice for local people and a growing population.</p>
281	209	2-Peckham and Nunhead			<p>Figures from August 2010. Need updating as there seems to have been deterioration in the situation since the period used in the plan. Ward % of 16-64 age group claiming key out of work benefits July 2011(1) Livesey 21.7% Nunhead 22% Peckham 20.1% Peckham Rye 12.9% Southwark 14.2% England 12.3% Source: Ward Labour Market Profile http://www.nomisweb.co.uk (1) Key out-of-work benefits includes job seekers, ESA and incapacity benefits, lone parents and others on income related benefits. In all four wards, the numbers of those on ESA/Incapacity benefit outnumber those claiming Jobseekers Allowance indicating above average levels of ill-health and disability in the action plan area.</p>	<p>This section has been updated.</p>
282	209	2-Peckham and Nunhead			<p>Could perhaps mention adult education – it's offered in a range of community settings in the area Thomas Calton Centre, Alpha Street, Peckham, SE15 4NX Peckham Library, 122 Peckham Hill Street, SE15 5JR Peckham Rye Tabernacle, 55a Nigel Road, Peckham, SE15 4NP Rye Oak Children's Centre, Whorlton Road, Peckham, SE1 5JR Nell Gwynn Nursery School and East Peckham Children's Centre, Meeting House Lane, Peckham, SE15 2TT http://www.southwark.gov.uk/info/100009/leisure_and_culture/1001/adult_learning_courses/1</p>	<p>We will update the baseline information of our sustainability appraisal at the next stage of consultation. We will also be preparing background papers to set out more information about Peckham and Nunhead.</p>
283	209	2-Peckham and Nunhead	Policy 3		<p>'Supporting the regeneration of the southern end of Rye Lane with more cafes, bars and restaurants' A survey and mapping of food outlets in the Peckham core area indicates there is already a large number of cafes, and hot food outlets in the core area. There are far fewer restaurants if these are defined as establishments offering eat-in meals only. (72</p>	<p>We have set out in the Preferred Options policy 4 (Hot Food Takeaways) that we will restrict further growth of A5 use. This includes the two approaches of establishing a 400m exclusion zone around secondary schools and limiting the number of hot food takeaways to 5% and also preventing clustering of A5 units in</p>

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		d			fast food places, cafes and restaurants, 22 of which are A5 licensed.) A survey of menus suggests that most of the cafes and small restaurants also offer a take away service of relatively unhealthy fast foods, the most common items being fried chicken, kebabs, pizzas and Chinese take aways. So encouraging more cafes, bars and restaurants may lead to the area becoming saturated with more establishments making very similar offers. The challenge is to promote a greater variety in the offer, including the promotion of outlets serving healthier options. It would be good if the economy could be enlivened by other means and ones that enriched the lives and cultural opportunities of local people and provide activities for families. At present people are unlikely to come to Peckham to eat especially but might come for other cultural and shopping experiences. (Neighbouring Lordship Lane has developed as a place to eat out but this development took place in conjunction with growth in the number and types of shop in the area). Seeking to use the night-time economy as a lever of regeneration does need to be carefully considered as sometimes there can be untoward consequences and little benefit to local residents. It is recognised that there are a number of problems with other areas where there is a night time economy (perceptions and/or actuality of binge drinking/lewd behaviour/street nuisance and crime) and it will be important to ensure that growth in the night time economy is not accompanied by any loss of amenity or safety in the area.	Peckham and Nunhead town centre protected shopping frontages. We have undertaken a survey of the Nunhead and Peckham town centre protected shopping frontages and calculated the existing number of different uses in order to inform our policy approach. Through our Preferred Option policy 2 we seek to promote the provision of more cafes and restaurants, leisure and entertainment uses to help make Peckham a better place to go out in the evening and add more variety. Through previous consultation people have said they would like to see the development of the evening and night-time economy in Peckham to help the town centre become more lively. We also want to promote more arts/cultural uses in the area to build on Peckham's reputation as a creative hotspot in London and to help generate new jobs and contribute to the vitality and variety of the town centre. These uses will complement additional evening and night time economy uses.
285	209	3-Vision and objectives			Theme 1 Agree that the range of shops should be increased but have reservations about an increase in the number of restaurants/cafes unless they are making a very special or distinctive offer. (e.g. a restaurant that offers vocational training to local people; a café offering live music or theatre.)	Noted. The policies relating to the town centre and hot food take-aways will help to tackle these issues. We also want to encourage a range of evening uses but we are restricted by planning regulations which only allow us to specify what use classes we think are appropriate.
286	209	3-Vision and objectives			Theme 2 Promoting active and healthy lifestyles etc This is supported	Noted.
287	209	3-Vision and objectives			Theme 2 Over concentration of any use type This is supported – it is recognised that at the moment many people take their 'local spend' out of Peckham – it would be good to increase what is on offer there.	Noted.
289	209	3-Vision and objectives			Theme 3 Discouraging car use Although the intention behind discouraging car use is understandable, there is a need to ensure that this does not develop into a war against the motorist or effectively bar particular demographic groups from living in or visiting certain areas. Some people need to drive /be driven because of disability/frailty and if Peckham is to be treated as a major town centre, it needs to be accepted that some people will come by car, particularly as there are nearby areas where the current public transport links are poor. Suggest that the wording be amended to convey the idea of reducing the need for private car use by providing alternatives. Car clubs/mayor of London's cycle scheme may play a role here.	The policies relating to transport and movement provide more detail on our approach.
290	209	3-Vision and objectives			Theme 4 Housing Is energy efficiency included in 'improving our housing stock' – essential for many of the older properties and high levels of fuel poverty?	All development in the area will have to comply with the Core Strategy and the AAP policies which expect a certain level of sustainability. We also have out Sustainable Design and Construction SPD which sets out guidance on how new and existing buildings can be more efficient and reduce their impact on the environment, climate change etc.
291	209	3-Vision and objectives			More non-food shops in Peckham Town Centre This is supported. However one of the challenges for developing the shopping in Peckham is the level of poverty and probably lowish local spend making a poor business case for some types of shop. Achieving a better shopping offer may also depend on developing local economic activity, increasing employment and business opportunities in the area and, more generally, a reduction in the current high levels of unemployment.	Noted. The policies in the AAP on retail and employment aim to ensure that there are a range of uses in the town centre.
292	209	3-Vision			Developing an evening economy Some reservations have already been expressed above	Noted.

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		and objectives			regarding this. Peckham also sits between Camberwell Church Street and Lordship Lane where there is already a good offer of restaurants and cafes. Several pubs have closed down in recent years suggesting that they have not been profitable.	
293	209	3-Vision and objectives			Protecting and enhancing open spaces Strongly supported, as is any opportunity for horticulture/food growing.	Noted.
294	209	3-Vision and objectives			Providing additional protection to SINC's Again supported – however skilled work is needed to reinstate and maintain a wider variety of flora and fauna so protection needs to go hand in hand with achieving better biodiversity	Noted. Our forthcoming Open Space Strategy includes an action plan and sets out how we will improve our open spaces including SINC's.
295	209	3-Vision and objectives			Development management Nunhead is mainly terraced housing, a lot of which of which has been broken up to provide flats. So is not accurately designated as low density housing (which might be an area with a high number of detached and semi detached houses). Two storey terraced housing such as is found in the area can offer very efficient densities 300-400 HR/Ha. Overall the density is low because of the large amount of green space in the area.	In our view its character is more suburban with the density of housing being relatively low.
296	209	3-Vision and objectives			Facilities for children Strongly supported- there is a pressing need to increase the attractiveness and accessibility of the physical and social activity offer to families, children and young people. In an area where incomes are lower having these public facilities is particularly important for supporting children and families and developing social capital/community cohesion. Also suggest adding a similar objective to the Peckham neighbourhoods section. (Is an audit needed of resources for children and young people across the area of PNAAP?)	Noted. The new section for the character areas sets out detailed information and more detail on local requirements and needs.
297	209		Policy 2		Support any proposals which will improve the quality and conviviality of Peckham Square. Development of the side facing the Peckham Space would help a lot (the Kentish Drovers side). Any developments need to benefit local people as well as developing a cultural offer to people travelling from outside Peckham. Any evening economy developments need to take into account the potential noise, nuisance and community safety concerns. This may be of particular relevance to the residential area north of Peckham Square and noise and nuisance behaviour arising from greater 'after hours' use of the Canal Path as a cyclist and pedestrian thoroughfare. Visitor management plans: These will be a crucial tools and should not be treated as perfunctory add ons. Any visitor management plan will need to ensure: •No tolerance of anti-social behaviour and a clear plan for preventing it •Prevention of alcohol-related violence and sexual offences (currently troublesome issues in Southwark as a whole. See Appendix 1 for more detail) •Clean and attractive environment and public realm •Integrated and safe late night transport system •Attracting a more diverse visitor base (in terms of age and cultural interests)	Support noted. We have set out in Appendix B the Preferred Options proposal site descriptions. We promote the redevelopment of PNAAP 10 – Eagle Wharf. Development on the site will need to strengthen the civic cluster of buildings and increase pedestrian links to Peckham Square and improve and increase the public realm provision in the town centre. The objective is for the redevelopment of the site to increase the use of the square through the provision of new cultural facilities, including being a suitable location for a cinema. This will help reinforce the square as a cultural focus for Peckham. Our saved Southwark Plan policy 1.7- Development within Town Centres is used to assess new uses in town centres and proposals must demonstrate that they will not materially harm the amenities of surrounding occupiers and it would not harm the vitality and viability of the centre.
298	209		Policy 2		As has become clear in many areas in the UK, the commercial development of the night time economy, particularly in terms of bars and clubs has resulted in considerable demands on the public services in terms of policing, the criminal justice system, street cleaning and dealing with other nuisance, use of ambulances, the A and E department, loss of amenity to local residents etc. It is important, particularly given the current economic situation, that these negative externalities do not continue to be borne by the public purse and local communities. Part of this will be by ensuring that there is a strong cultural offer capable of appealing both to the residents and to visitors, so that the night time economy does not solely revolve around clubbing, eating and drinking. Peckham is already within the alcohol saturation zone which is likely to limit new licences where they may have a detrimental impact. The new Police Reform and Social Responsibility Bill going through Parliament has, as one of its aims, the intention of 'rebalancing' licensing in favour of local authorities, the police and local communities and and health will become a responsible body in terms of consultation. This new legislation may be a useful tool in	Through our Preferred Option policy 2 we want to promote the provision of more cafes and restaurants, leisure and entertainment uses to help make Peckham a better place to go out in the evening and add more variety. Through previous consultation people have said they would like to see the development of the evening and night-time economy in Peckham to help the town centre become more lively. We also want to promote more arts/cultural uses in the area to build on Peckham's reputation as a creative hotspot in London and to help generate new jobs and contribute to the vitality and variety of the town centre. These uses will complement additional evening and night time economy uses. Our saved Southwark Plan policy 1.7- Development within Town Centres is used to assess new uses in town centres and proposals must demonstrate that they will not materially harm the amenities of surrounding occupiers and it would not harm the vitality and viability of the centre.

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					promoting more responsible and imaginative developments	
299	209				Retention of a cinema is supported	Support noted. Our preferred option sets out that we will seek to retain a cinema within Peckham town centre.
300	209		Policy 2		Provision of working space for artists, musicians and craftspeople is supported. The affordability of such space however is important as most people in this sector of work don't make a high income. Nevertheless as indicated they are a valuable presence in Peckham and can positively influence further economic and cultural development and reputation.	Support noted. Our Preferred Option policy 6 promotes the provision of flexible new business space which can accommodate a range of units sizes and types of businesses to meet the needs of small and medium sized businesses. Our objective through Preferred Option Policy 2 is to continue to promote more arts/cultural uses in the area to build on Peckham's reputation as a creative hotspot in London and to help generate new jobs and contribute to the vitality and variety of the town centre.
301	209		Policy 2		As already stated, there are already quite a large number of cafes/fast food establishments (and few eat –in only restaurants) From a public health point of view, the most desirable option is to see the food offer of such establishments improved and developed rather than a numerical increase. There is a risk that further increases in the number of food outlets will not be any different to what obtains currently, i.e. cafes and smaller restaurants offering predominantly relatively unhealthy fast foods. One of the recommendations of the Marmot Review was the need to improve the food environment in local areas across the whole social gradient but in particular to improve availability of and access to healthier food choices amongst low income groups while at the same time reducing unhealthy options. This is of particular relevance to more deprived areas.	We have set out in the Preferred Options policy 4 (Hot Food Takeaways) that we will restrict further growth of A5 use. This includes the two approaches of establishing a 400m exclusion zone around secondary schools and limiting the number of hot food takeaways to 5% and also preventing clustering of A5 units in Peckham and Nunhead town centre protected shopping frontages.
302	209		Policy 3		The central area of Peckham is well-furnished with such food outlets such as restaurants, cafes, fast food takeaways and bakeries – approx 72 in all, 22 of which are hot food takeaways. There is a particular clustering on Rye Lane and Peckham High Street. (This total does not include the many convenience stores, chemists and supermarkets which also sell sandwiches, pies etc.) There are very few establishments that only sell food to people who are seated in the premises and it can be hard to distinguish hot food takeaways from the many cafes and restaurants that offer food on a take away basis as well as the chance to eat in. This evidence is summarised in Appendix 2. Given this, we support the restriction of takeaways and the use of exclusion zones round schools. The existing policies referred to in Option 3 cannot be regarded as satisfactory as they have allowed a proliferation of food outlets, mostly offering takeaway food, so that there is already something approaching saturation in the area. Peckham and Nunhead have poorer health compared to the rest of Southwark and nationally. The area has particularly high levels of coronary heart disease, respiratory disease, and hypertension. The borough also has a high rate of infant mortality and low birth weight babies and maternal obesity leads to a higher risk of pregnancy related complications. Child obesity in Southwark is the highest in the country for 4-5 year olds and third highest for 10-11 year olds. Some of the highest rates are in Peckham schools. Overweight and obese children are more likely to become overweight and obese adults and are more likely to develop type 2 diabetes, hypertension, heart disease, some cancers and joint problems. Adult obesity in Southwark is also an issue - approximately 22% of adults are estimated to be obese and many more are overweight. Appendix 3 provides more relevant evidence around the impact of concentration of fast food outlets in neighbourhoods.	We have set out in the Preferred Options policy 4 (Hot Food Takeaways) that we will restrict further growth of A5 use. This includes the two approaches of establishing a 400m exclusion zone around secondary schools and limiting the number of hot food takeaways to 5% and also preventing clustering of A5 units in Peckham and Nunhead town centre protected shopping frontages. We have identified in the Preferred Options that the proliferation of A5 uses and their clustering together can lead to dead frontages and an overconcentration which may affect the viability and vitality of a centre, undermine the predominantly retail function of the shopping centre and collectively impact upon the amenity of the surrounding area. These problems can be added to where there are cafes, restaurants and pubs in the vicinity, especially where they also provide a takeaway service. Our policy would restrict further growth of hot food takeaways. Policy 1 of the Preferred Options also seeks to promote and maintain a vibrant balance of uses along either side of Rye Lane and Peckham High Street to help strengthen the shopping environment. This includes both food and non-food shopping.
303	209		Policy 4		Supported and this mixed zoning may well help with issues of safety and security in the area by introducing more passive surveillance – however any residential usage will need to have its amenity protected from other businesses (such as fast food outlets), night time noise etc. Any residential accommodation will need to be of a good standard and in good repair. Much of it may have been neglected for many years and will need considerable renovation to be fit for habitation or business use.	Support noted. Our preferred approach is set out in Policy 1 which is to support proposals which bring vacant upper floors above ground floor shop units in Peckham town centre back into use. To ensure there is a balanced mix of uses in the town centre we have set out a number of criteria in our preferred option for Policy 1 which will ensure the proposed use is acceptable and increases the vitality of the town centre.
304	209		Policy 5		Supported	Support noted
305	209		Policy 6		Supported - Local shops are central to reducing car use and creating sustainable	Support noted. The document referenced is part of our evidence base for the

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					neighbourhoods, and provide wider social and economic benefits: over 50 per cent of the turnover of independent retailers goes back into the local community, compared to just 5 per cent from supermarkets. Local shops are the focus of detailed recommendations from the GLA's Planning and Housing Committee in their report Cornered Shops. http://www.london.gov.uk/who-runs-london/the-london-assembly/publications/housing-planning/small-shops Suggest cross checking with the recommendations there to ensure that everything possible is done to help the continuing existence of these enterprises. There also needs to be support from other areas of the council (e.g. borough valuer to ensure that rents of council owned properties are manageable by small businesses with a low turn over, transport to ensure that there is adequate free short term parking,)	Local Development Framework. We have set out our support for maintaining local shops and services and encouraging a vibrant mix of uses in shopping frontages in Policy 3 of the Preferred Options. The Policy would also work in conjunction with our saved Southwark Plan policy 1.10 which protects essential local services where they are the last available use of their type within a 600 m catchment area. We work with our colleagues in Property and Economic Development to help support local economic projects and initiatives so that we can seek to ensure employment and businesses opportunities for local people are maintained and increased.
306	209		Policy 9		Supported; However in addition to the aspiration to protect and enhance the MOL and BOL land cited, there is quite a lot of open space as part of social housing and private housing estates. The evidence base prepared by PMPGenesis examined and mapped the amenity green space associated with housing areas. Peckham has 11ha of such space scattered over 40 sites and this is a valued local resource particularly as Peckham does not have its own district park. However, the wide range of ownership of relatively small plots of open space can lead to a dis-jointedness of responsibility where 'boundary' land is not cared for. In the consultation, dissatisfaction with these spaces was highest in Peckham (at 42%) so it is important for these spaces to be considered - and retained - in any overall action plan. Ideas for making good use of amenity space can be found in http://www.neighbourhoodsgreen.org.uk/ http://southwarklivingstreets.files.wordpress.com/2008/07/peckham-improving-streets-public-places-07jun102.pdf	Amenity green space is not designated as protected open space. These spaces are often of poor quality and in need of improvement. The council's residential design standards SPD sets out our approach to re-providing amenity space as part of new development.
307	209		Policy 10		Supported	Support noted
308	209		Policy 11		Supported	Support noted
309	209		Policy 12		Supported	Support noted
310	209		Policy 13		The aspiration for improving health and reducing health inequalities needs to be understood more broadly in this action plan than simply in terms of the provision of health estate, important though this is. Poor environments contribute significantly to poor health and health inequalities - and thus all of the policies in the action plan need to be understood as having the potential to impact positively (or otherwise) on health and need to be read as such. Features of the environment that are powerful determinants of health and well-being are: •The location, density and mix of land uses •Street layout and connectivity •Access to public services, employment, fresh food and other services •Safety and security •Environments that promote and normalise healthy eating, •Open, interlinked and green space •Affordable and energy efficient housing •Air quality and noise •Extreme weather events and a changing climate •Community interaction •Transport – supporting active transport and walking/cycling to school Developments will need to embody healthy design principles, incorporating measurable standards. Such principles would typically cover the issues listed above. • When planning new development or extending existing development ensure plans and proposals will need to demonstrate how all the core set of health promoting design principles are met. • Use the principles to prioritise funding provision (such as Section 106) • Consider rejecting plans and projects that do not sufficiently address issues relating to health and wellbeing where there is a policy basis and sound evidence to do so. The core strategy states that larger developments will need to have health impact assessments. This may apply to some of the developments in the area but we would wish to see the health dimension of new developments considered as a matter of course and not only when a particular size threshold is reached. With the shift in health and social care to care by community services nearer to home and less use of hospital and residential care, the quality, accessibility and safety of the local environment will be increasingly important for older people and others living with long term	The Preferred Options set out a range of objectives and policies which seek to address community well-being and improving quality of life. The Core Strategy policies and saved Southwark Plan policies will also be used to assess whether developments contribute positively to the health of the population and that negative impacts are mitigated.

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					conditions/sensory or physical or learning disability.	
311	209		Policy14		Supported. Suggest that the amenity green spaces also be considered where there is a community wish for such facilities e.g. provision of a simple active play facility, green gym.	Support noted.
312	209		Policy 15		Strongly supported. With regard to the mayor's cycling scheme, at present it comes no further south than Walworth. It would be good to have the facility in Peckham and Nunhead, perhaps along cycle routes 2, 22 or 23. The Living Streets report referred to earlier provided a very thorough and close grained analysis of the barriers to walking and cycling and has many suggestions for improvements many of which are low cost (e.g. decluttering streets, removing guard rails) We would wish to ensure that these ideas are considered in future plans so that the work is not lost as the area plan cannot go into this level of particularity.	Support noted. Currently Transport for London has no plans to extend the cycle hire scheme to Peckham and Nunhead, but the council are continuing to lobby for the expansion of the scheme. This is set out in policy 11 of the preferred option. A number of the recommendations from the Living Streets report are too detailed for the AAP, but many are addressed in the council's Transport Plan. Improvements will be delivered as resources as allocated via the Transport Plan, through funds accumulated through section 106 planning obligations/community infrastructure levy or through other sources of funding. As part of new developments, the public realm and potential routes in the vicinity the development will be improved.
313	209		Polic 16		General aims are supported, particularly the intention to work with TFL improving public transport. This will be the appropriate organisation for buses. However unless TFL has a major co-ordinating role, Southern, South Eastern and Network Rail may need to be added. There is local concern about the loss of the South London Line after 2012. This presently offers a good and frequent service to Central London 7 days a week, something that is important which is important for commuters and leisure use as the bus services to Central London is slow and unreliable. If there is an aspiration for Peckham to become a destination for new businesses, tourists and other cultural visitors, there will need to be fast and frequent direct rail connections serving central London and enabling people to switch easily onto the underground network 7 days a week It is important to remove the disincentives to using public transport (principally unreliability and over crowding). Although the East London Line will be a welcome addition, it does not compensate for a poorer service to London Bridge (a major employment and business zone) and to Victoria.	Policy 12 sets out the policy for public transport, including setting out what our key priorities are for improving the frequency, quality and reliability of public transport. Section 7 sets out where we have committed projects already to improve the supporting infrastructure for the area. At the next stage of consultation we will set out a more detailed infrastructure plan.
314	209		Policy 17		Option 1 is supported as there is likely to be an increased demand for public transport.	Support for Option 1 noted. We have taken forward a combination of option 1 and option 2 from the towards a preferred option as set out in policy 12 of the AAP preferred option and site PNAAP 9 in appendix B.
315	209		Policy 18		Supported	Support noted.
316	209		Policy 19		The Peckham CPZ operates 8.30 am-6.30 Monday to Saturday, a longer period the other CPZs in Southwark around other town and local centres which operate Mon – Fri only except for the London Bridge CPZ. This will be one of the reasons for higher occupancy of the car parks at weekends (which in effect mean Saturday as parking is not restricted on Sundays). Consideration could be given to aligning Peckham with the other CPZs in Southwark unless there is a very clear rationale for the 6 day CPZ. Short stay parking on Saturdays, a busier day for shoppers, could be facilitated in this way. Residents would need to be consulted about any such change and continuing to protect residents parking might be appropriate, but this might offer a solution to developing more short stay parking for future developments and might also stimulate visits to the smaller shops and markets. The free parking at Netto (Asda), Morrisons and Lidl obviously has the effect of supporting usage of these stores. It is important to avoid rail commuters parking in the vicinity of railway stations for the entire day - the solution that has been used as at Herne Hill of preventing parking between 12 and 2 could be explored.	The Peckham town centre car parking and delivery review study (2010) highlights that the supply of car parking is well in excess of current demand, even at peak times and even taking into account forecast increases in demand due to future developments. The study suggests that we will be able to redevelop some of our existing car parks and retain sufficient car parking to support shops and businesses in the town centre. Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. We will continue to monitor the supply and demand for car parking in Peckham, including whether changes to existing Controlled Parking Zone (CPZ) arrangements would be beneficial. No changes to CPZs are proposed through the AAP and any future change would be subject to consultation with the local community.
317	209		Policy 20		Option 2 is supported –, it is best to retain some flexibility according to the projected demographic of a particular development. Care needs to be taken too that adequate loading space is available for developments as there is increasing use of supermarket delivery services. Another factor needs to be considered and that is the increasing pattern of health and social care taking place in the home. Care workers, informal carers, personal assistants, district nurses, physiotherapist etc may need to be able to park in order to undertake their visits. Many disabled people are not wheelchair users and their needs	Our preferred approach is to encourage car free residential development in Peckham core action area, but to allow schemes to include up to 0.3 spaces per unit where this level of parking can be justified through a transport assessment. This is because the core action area has very strong links to public transport. As exceptions to this rule, we will allow disabled car parking and car club spaces to be provided. This is set out in AAP policy 15. Policy 13 refers to the need for all new developments to demonstrate adequate, safe servicing arrangements. All

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					should be considered too. Expansion of car clubs is supported. At present the options in Peckham are few. Is there a case for using some of the currently underused parking spaces for car club bays? Also in reviewing parking, has there been a check on the number of disabled parking bays in the area to ensure that they are sufficient to meet the needs of disabled residents and visitors with blue badges?	commercial developments will be subject to the maximum parking standards that are set out in Appendix 15 of the Southwark Plan and the London Plan. Policy 1.6 of the Transport Plan sets out that when reviewing Controlled Parking Zones (CPZ) we will consult with local people to find out if they support surplus spaces being used for cycle parking, car clubs, street trees or other measures to tailor them to local needs.
318	209		Policy 21		Supported	Support noted.
319	209		Policy 22		Higher densities may lead to undesirable outcomes such as the omission or loss of urban open space, localised congestion, excessive noise, and general loss of amenity such as light, sunshine, and a view of the sky. The concentration of people, though undertaken in the name of sustainability, can also make for higher environmental impacts through noise, pollution and waste which need to be accommodated by the design and management of the developments. Adverse effects may be more likely where accommodation is rented rather than owned. A report from the Greater London Authority in 2007 found that buy-to-let investors had bought more than two-thirds of new build property in London and the churn and change in such settings can prevent people putting down roots in their neighbourhoods and collaborating to solve neighbourhood nuisance problems. Transient populations living in overcrowded conditions may also have an adverse impact on neighbourhood quality and weaken community cohesion and 'neighbourliness'. This may be more likely in areas such as Peckham where property prices are still relatively low compared to other parts of London. At present buy to let investors can find it easier to obtain mortgages than private individuals so this pattern may continue in the immediate future. Buy to let accommodation also may result in higher rates of multiple occupancy/growth in the number of HMOS and also family sized houses may be lost to this kind of use. HMOS may negatively affect communities if they are not well-managed. The changes in benefits for under-35s (who may now only claim for a room rather than their own flat) may increase the number of HMOS. The capping of housing benefits may also increase the level of rented housing in some parts of Peckham as larger families in receipt of housing benefits find that they may not be able to continue living in relatively more expensive areas. Design is important but given that the highest density developments are proposed for the town centre where there is very little green infrastructure, caution is appropriate: an exemplary standard of design cannot and should not be the only criterion. Standards of neighbourhood space, local amenity, internal housing space, potential noise disturbance and arrangements for maintaining communal parts of buildings and external space also need to be considered. It would also be helpful to have a sense of the number of people per hectare as this makes it easier to consider what additional community infrastructure may be needed	Our approach to density is set out in the adopted Core Strategy, including the map which figure 24 is taken from and is reflected in the AAP. The density ranges are quite broad and the density of new development will have to reflect the local area as well as the relevant policies in the AAP, the Core Strategy and the Saved Southwark Plan. We have updated the AAP to include two policies on sustainability - policies 20 and 21 - which aim to balance growth whilst taking environmental issues into account. We also have the Core Strategy policy 13 - high environmental standards which is supported by the Sustainable Design and Construction SPD which sets out our requirements for new development. Development in Peckham and Nunhead will also have to meet the standards set out in our Residential Design Standards SPD. The SPD covers size, amenity space, daylight etc. we have also added our minimum floorspace table policy 18 on the mix and design of new homes. Section 7 in the AAP deals with implementation and how we will provide the necessary level of infrastructure alongside new development. This section will be more detailed at the next stage on consultation and include an infrastructure plan.
320	209		Policy 23		Supported	Support noted.
321	209		Policy 24		Supported	Support noted.
322	209		Policy 25		Supported	Support noted.
323	209		Policy 26		Supported	Support noted.
324	209		Policy 27		Supported	Support noted.
325	209		Policy 28		Supported NOTE. THERE ARE GRAPHS AND TABLES AS APPENDICIES IN THE FILES	Support noted.
326	241			6	Thank you for consulting Network Rail on the Peckham and Nunhead Area Action Plan. Network Rail welcomes the opportunity to work with Southwark Council and key stakeholders to support the growth of Peckham and Nunhead. The representations made in reference to the above document are with particular regard to Peckham Rye Station and surrounding sites in Network Rail ownership. Site 3: Land between railway (East of Rye Lane including railway arches) and Site 6: Peckham Rye Station Network Rail support the	Support noted.

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					redevelopment of Peckham Rye Station and the proposed land uses subject to any forthcoming scheme being commercially viable. Network Rail considers that redeveloping the Peckham Rye area will enhance the passenger experience for customers using the station as well as unlocking the potential of the area.	
327	545		Policy 21		Souhag welcomes these targets. We think they are challenging, but recognise and support the aim of facilitating new homes in this area	Support noted.
328	545		Policy 22		This policy is welcomed in principal, but it is very important that once adopted, it is implemented fairly and consistently. In particular, the term 'exemplary' is open to interpretation. Souhag members can give examples of where schemes have not been taken forward because the design has not been considered good enough to justify the high density. These were in our view high quality schemes and ultimately it is to no-ones benefit if the developments do not go ahead.	A cross-reference to our Residential Design Standards SPD has been added to the supporting text. Section 2.2 of the SPD sets out the criteria that developments are expected to meet before their design is considered exemplary.
329	545		Policy 23		The terms 'affordable housing' and 'social rented' will need to be clarified and may need to change in the light of the new regime and the introduction of the new term 'Affordable Rent' We think the 50:50 tenure split would be very difficult to meet on smaller schemes (which are likely to be a single block of flats). We think a 60:40 rented: intermediate split is often better as the level of risk at 50:50 may make some sites not viable, and that the policy should allow for some variation. We think the split should be more flexible and considered on a site by site basis. We think the threshold should be raised to 15-20 units, where the split can be more easily designed/built/managed. We would be concerned that this restriction could prevent development from taking place (as has happened in LB Croydon).	We have updated the fact box on affordable housing, which follows policy 17, to include the definition of affordable rent. Policy 17 in the AAP sets out our approach for Peckham and Nunhead which is for 50% social rent and 50% intermediate in accordance with the Core Strategy. Any departure from this approach needs to be fully justified. We took a report to planning committee which clarifies this approach which is now available on our website. We will continue to review our approach to affordable housing through the Affordable Housing SPD. The draft Affordable Housing SPD currently explains that we will consider scheme viability through a financial appraisal. This approach provides flexibility for schemes which do not fully meet the policy requirements. All proposals will be considered on a case by case basis.
330	545		Policy 24		We do not think the requirement to develop homes for private sale on all sites of 10 units or more is workable. Many sites in this area are already marginal, and this restriction would make them unviable. There is no reason why this approach should not work on larger schemes, including regeneration schemes, but not on small schemes (which are likely to be one block of flats). We think that if this requirement is to be introduced, the site size threshold should be increased to 20+ units. There should also be some flexibility on a site by site basis – we acknowledge that in some part of the Area homes for private sale are viable, but in others they are probably not. This requirement would definitely deter some RPs from developing in the area. It is likely that many private homes would simply be sold as buy-to-let (particularly in these lower value areas) and the problems this can bring have been well documented. We would argue that housing allocations policy is a better way to create a mixed community, without reducing the supply of affordable housing. We agree that a diversity of tenure is a good aim, but do not think trying to 'force' private home ownership will work in all areas. We suggest that there should be flexibility to consider other options within the proposed 35% housing for sale, such as allowing an RP to develop it as some for o f low cost home ownership.	Our approach to affordable housing is set out in the Core Strategy. Our draft Affordable Housing SPD provides a flexible approach to our affordable housing policies, including setting out how we will consider financial appraisals and scheme viability. All proposals will be considered on a case by case basis and there may be some circumstances where we will accept a departure from policy if it is justified to our satisfaction through a financial appraisal. The onus is on the developer to make the case that the requirements of the policy cannot be met.
331	545		Policy 25		The wording needs clarifying – does it mean any combination of 20% (or 30%) 3, 4 & 5 bed homes. It needs to be acknowledged that the new funding regime means the development by RPs of larger homes (4 & 5 bed) will be severely reduced. We assume private amenity space includes balconies, but this should be clarified. Does 'play space' mean communal external play space, or can it be included within private amenity space? If the former, it needs to be acknowledged that small developments with just a few family sized homes could not support a communal play area.	The wording has been clarified. It means 20% (or 30%) need to have 3 bedrooms or more.
332	545		Policy 26		The averages are a helpful control and this is welcomed. We do think there needs to be room for some variances based on site specific circumstances and scheme viability. For homes for 6+ people we are concerned about the word 'approximately' (10 sqm etc). Approximately is a vague term and open to different interpretations. We would suggest a minimum of 10sm per extra person should be adopted.	This approach is in line with the London Plan. The averages allow for a level of flexibility and the approximate 10sqm is there to take into account the variations in a scheme.

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333	545		Policy 27		To achieve Lifetime Homes for all units would be very difficult to achieve. We always aim for lifetime homes but it does not work on some sites. Anecdotal evidence from some RPs is that there can be difficulties in identifying suitable tenants for existing wheelchair homes – that the demand is not always there – so we would ask that the Planning Dept be satisfied that their requirements are based on sound evidence of need. It has been suggested that as the number of lifetime homes increases, with their built in ‘adaptability’, the need for full wheelchair homes may decrease? For wheelchair homes we are assuming the latest sub-regional standard is the one that will be applied, but this should be clarified.	The approach to Lifetime Homes is set out in Saved Southwark Policy 4.2 which seeks to ensure that all new homes to meet the standards. Our approach to wheelchair housing is also set out within the saved Southwark Plan. The AAP takes forward both these approaches. We will review this policy when we begin work on our Development Management DPD for the whole of Southwark.
335	546	5.2-Sites for major development;		14	As a local resident, I agree with other local residents who wish the Holly Grove Car Park to remain part of the conservation area - an open space. An open park green space. Not meant to be built on.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough’s open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
336					Rep deleted - duplication (Tiger Development)	
337					Rep deleted - duplication (Tiger Development)	
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346					Rep deleted - duplication (Tiger Development)	
347	547	1- Introduction and background			Figure 2: Area covered by the Peckham and Nunhead AAP There is some inconsistency throughout the draft AAP with regard to the defined Major Town Centre boundary. Figure 2 of the draft AAP defines a smaller boundary for the Major Town Centre than that illustrated in Figure 4 of the AAP and that identified within Southwark’s adopted Core Strategy Proposals Map (6 April 2011). The Major Town Centre boundary is an important policy designation and the emerging AAP must be in accordance with the boundary defined within the adopted Core Strategy Proposals Map. The adopted Major Town Centre boundary extends significantly further along Peckham Road than depicted in Figure 2, and includes our clients’ site 110 Peckham Road. Peckham Road is an important gateway from the West of the town centre, linking Peckham High Street (east/west) and Rye Lane (north/south). Peckham Road has a clear commercial character, comprising mixed town centre uses along the length of this frontage, including Peckham Academy (D1), hotel uses (C1), retail (A1-A5), healthcare facilities (D1), leisure uses (D2) and high density residential uses (C3) in the form of recent flat developments. Recent planning permissions along	We have updated the figures in the Preferred Option AAP. We have also amended the town centre boundary. The amended boundaries can be seen in the proposed amendments to the proposals map document which will be published alongside the Preferred Option document.

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					Peckham Road include the mixed use development of the fire station site (82-86 Peckham Road) comprising 7 storeys of residential and commercial uses. The nature of this road as a key bus route and main distributor road means that the existing uses and development opportunities available along this frontage are synonymous with major town centre uses and should be designated as such within the AAP. We therefore object to the Major Town Centre boundary as shown in Figure 2 and request that the Major Town Centre boundary is amended to accord with the adopted Proposals Map.	
348	547	2-Peckham and Nunhead			Figure 4: Public Transport Accessibility We support the Major Town Centre boundary as identified in Figure 4 as it accords with the adopted Proposals Map.	Support noted. However, we have made small amendments to the boundary of Peckham town centre, as shown within the AAP and in the proposed schedule of changes to the proposals map.
349	547	2-Peckham and Nunhead			Figure 5: Existing Town Centre Uses As discussed above, the Major Town Centre boundary should be amended to accord with the adopted Core Strategy Proposals Map. Furthermore, within the amended boundary, further existing and committed mixed town centre uses should be identified in Figure 5, including those fronting Peckham Road comprising educational, leisure (including hotels), retail, office/commercial, healthcare and community uses that serve an important function within Peckham Town Centre. We therefore object to the Major Town Centre boundary as shown in Figure 5 and request that the Major Town Centre boundary is defined as per the Adopted Proposals Map and that Figure 5 is subsequently amended to identify existing mixed town centre uses along Peckham Road, including 110 Peckham Road.	We have updated the figures in the Preferred Option AAP. We have also amended the town centre boundary. The amended boundaries can be seen in the proposed amendments to the proposals map document which will be published alongside the Preferred Option document.
350	547	3-Vision and objectives			Figure 8: The Character Areas Similarly, with the draft AAP reflecting the inaccurate Major Town Centre boundary, there are existing uses along Peckham Road which are at odds with the vision for the 'Peckham Neighbourhoods' character area as shown in Figure 8. The eastern end of Peckham Road shares the strengths and character traits of the remainder of Peckham Town Centre as a key strategic transport corridor, low vacancy levels and suitable and deliverable large development sites. This location however does not sit comfortably within the criteria for the 'Peckham Neighbourhoods' area whereby low scale residential areas are the key focus. We therefore object to the designation of Peckham Road, including 110 Peckham Road, as part of the 'Peckham Neighbourhood' area and request that Figure 8 be amended so that the Peckham Town Centre character area is based on the adopted Major Town Centre boundary as per the Proposals Map.	We have updated the figures in the Preferred Option AAP. We have also removed the areas in Peckham section and replaced it with a more detailed section on character areas which covers the whole of the Peckham and Nunhead area and provides new diagrams for each area.
351	547	3-Vision and objectives			Figure 9: Peckham Town Centre Vision We object to the 'Area of mixed uses and activity' boundary as shown in Figure 9 and request that the boundary is amended to accord with the Major Town Centres boundary identified in the adopted Proposals Map.	We have updated the figures in the Preferred Option AAP. We have also amended the town centre boundary. The amended boundaries can be seen in the proposed amendments to the proposals map document which will be published alongside the Preferred Option document.
352	547		Policy 1	23	Figure 14: Town Centre and Action Area Boundaries We object to the 'Major Town Centre' and 'Core Action Area' boundaries as shown in Figure 14 and request that the boundaries are amended to accord with the Major Town Centres boundary identified in the adopted Proposals Map.	Comment noted. We have amended the town centre boundary to accord with the Proposals map. We have identified a 'wider action area' and a 'core action area', both of which we have refined through the preparation of the AAP. We may refine these further following this stage of consultation. Peckham core action area is focused around Peckham town centre, extending east to just past Queens Road Station and to include the Woods Road site south of Queens Road, west to the former Kennedy's Sausage Factory on Peckham High Street and south east to include the area around the Transport for London bus garage. Peckham Rye station is located in the centre of the core action area, Queens Road Station is located at the far east. We have identified the core action area, as where most of the physical change will occur. The town centre is focused around Rye Lane and Peckham High Street, covering the protected shopping frontages which are already designated through the Core Strategy.
353	547		Policy 1	23	Figure 15: Possible activity clusters in Peckham Town Centre We support the identification of a cultural/leisure cluster at the junction of Rye Lane and Peckham High Street leading	Support noted. We have removed Figure 15. We have set out in our Preferred Options Policy 2 that we will promote the development of additional

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					into Peckham Road; however, this should be extended to encompass the full extent of existing cultural and leisure activities located in this cluster, including the adjacent educational facilities (Peckham Academy) and hotel/leisure facilities at 110 Peckham Road. Expanding the cultural/leisure cluster in this manner strengthens the north-western edge of Peckham Town Centre as a key cultural gateway to the town centre.	arts/cultural/leisure and entertainment uses on the larger town centre sites which include Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6); Land between the railway arches (PNAAP 3) and Eagle Wharf (PNAAP 1) and continue to promote Peckham Square as the focus for cultural events in the town centre. These sites have been identified for their development potential, however we will also support the provision of such uses elsewhere in the town centre where appropriate.
354	547		Policy 2	23	Policy 2: Culture, tourism and the evening economy In order to reflect the wider cultural/leisure cluster identified above, Policy 2, Option 1 should be amended to reflect the entirety of the north-western corner of Peckham Town Centre as a cultural/leisure destination. 110 Peckham Lodge provides a significant opportunity to offer visitor accommodation, making better use of the land to optimise the site and linking its facilities to the wider cultural/leisure vision of this part of the town centre. Option 1 should also include amended support proposals for the intensification and enhancement of existing hotel uses, not just the creation of new hotel uses.	Support noted. We have removed Figure 15. We have set out in our Preferred Options Policy 2 that we will promote the development of additional arts/cultural/leisure and entertainment uses on the larger town centre sites which include Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6); Land between the railway arches (PNAAP 3) and Eagle Wharf (PNAAP 1) and continue to promote Peckham Square as the focus for cultural events in the town centre. These sites have been identified for their development potential, however we will also support the provision of such uses elsewhere in the town centre where appropriate.
355	547		Policy 30	23	Policy 30: Design Policy 30 sets out the key design characteristics for each character area within the AAP. As discussed above in relation to Figure 8, the inaccurate Major Town Centre boundary means that existing and committed development along Peckham Road is currently at odds with the vision for the 'Peckham Neighbourhoods' area. Development along Peckham Road is, in the main, above the 2-4 storey maximum set by the emerging AAP for Neighbourhood areas. As previously requested, Peckham Road, including 110 Peckham Road, should be removed from the Neighbourhood Area boundary and included within the Peckham Town Centre character area, in line with the Major Town Centres boundary identified in the adopted Proposals Map.	We have amended our Town Centre boundary to be more tightly drawn around the key town centre uses – which are predominantly retail. We have also redrawn the core area. The Peckham Lodge is now within the core area and we have amended the character areas to refer to the whole core, including the site referred to. Section 5 of the Preferred option AAP includes five new character area visions setting out the character, opportunities and policies for each. Section 5.2 Peckham core action area has area-specific policies which cover: • Policy 31: Land use • Policy 32: Transport and movement • Policy 33: Built Environment • Policy 34: Natural Environment These policies show how we will ensure that new development in Peckham and Nunhead is of the highest design whilst being appropriate to context and character.
356	547		Policy 31	23	Policy 31: Building Heights We support the proposal that some sites on landmark locations that mark a gateway point within the action area should be permitted to be above 6 storeys. However, the opportunity to enable taller buildings should not be restricted to pre-determined locations as set out in Policy 31 and should be decided on the individual merits of a site, based on an assessment of design, townscape impact and other relevant planning considerations. Furthermore, the justifying text included with Policy 31 does not acknowledge the extent of buildings already above 6 storeys in the Peckham area. There are a number of 7-13 storey buildings in and around Peckham Road and Talfourd Road. A more transparent assessment of existing building heights should be included within the AAP. We therefore object to Policy 31 specifying sites for taller buildings and request that this policy is more flexible to be able to allow a sound and robust assessment of planning applications on a site by site basis. Such an approach is consistent with CABE guidance on tall buildings.	Our approach to tall buildings is set out in policy 25 of the Preferred Option. Our approach identifies sites that are suitable for a tall building to ensure that other, more sensitive locations are protected. Our approach is also based on evidence such as the relevant conservation area appraisal and the characterisation study which examines and analyses the current make-up of the AAP area, its historic context and makes recommendations for future townscape opportunities, including the potential location of taller buildings. We will also be publishing a Tall buildings study as a further piece of evidence base work at the publications/submission stage of the AAP.
357	547		Policy 33	23	Policy 33: Locally Listed Buildings We strongly object to the proposed local listing of Peckham Lodge. The justifying text at Policy 33 and Appendix B do not provide any justification for the proposed listing. Locally listed buildings should be identified based on clear and transparent criteria. Southwark Council have not provided any information as to how locally listed buildings are assessed and/or the criteria for inclusion nor have the owners been contacted in this regard. Peckham Lodge was constructed in 1900 and has undergone a number of extensions and alterations since its construction. Originally designed as three separate buildings, the original roof was replaced after significant damage during WWII, the original front door has been removed and the majority of windows replaced. Inappropriate extensions to the rear of the building have taken place in the 1960's and 1970's have had a detrimental impact on the character of the original building. Our client is concerned that there is no justification for the proposed local listing,	We have inserted a fact box on locally listed buildings and provided more detail within the AAP policy. Our design and conservation team will be consulting on a local list of buildings across the whole of Southwark in Spring 2012. It is likely that this list will be adopted in late 2012. As part of this consultation they will be consulting the owners of properties on the local list and will attend community council. We will update the AAP at the next stage of consultation.

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					and that should the building be locally listed, it would significantly constrain and at worst prevent future development at the site. The Peckham Lodge site provides a significant opportunity for redevelopment that could provide a positive contribution to the AAP vision for this area of Peckham to become a cultural/leisure hub, attracting visitors and thus investment into the local area. As illustrated in Figure 21 of the AAP, the site is extremely well located in terms of public transport linkages, both existing along Peckham Road and proposed in the form of the future tram route. Redevelopment of the site could enable a significant improvement in hotel offer, both in terms of efficient use of the land, enabling higher quality rooms that meet modern build requirements and hotel industry standards as well as the evolving demands of consumers. We therefore strongly object to the proposed local listing of Peckham Lodge and request that this option is removed from the emerging AAP.	
358	547	5.2-Sites for major development;		23	Site Allocation Peckham Lodge is identified under Site 23 with the potential for housing (renovate existing building) or possibly to retain the hotel use and/or provide student accommodation subject to Core Strategy Policy 8 requiring an element of affordable housing. We are not clear as to the extent of the site which has been considered for development, and would welcome the Council's clarification on this point. Our client supports the identification of the site for development, and as stated above, considers that the site could contribute to the vision and objectives of the AAP and Peckham town centre. At present the Peckham Lodge site is in hotel use and it is highly likely that a hotel use will remain on the site in the foreseeable future but our client would welcome the opportunity to discuss development options with the Council further.	Noted. The site description has been amended to reflect the continued use of the site as a hotel. It has been retained as a proposals site if there are further development opportunities in the future.
359	548	5.2-Sites for major development;		14	One of the biggest sites earmarked for development in this area is the Choumert Grove car park. The council currently suggests, in the Peckham and Nunhead Area Action Plan (PNAAP), that the majority of the land could be used for 30 housing units in 4-storey blocks. The car park site is on the edge of the Holly Grove Conservation Area, in the area the Council has proposed for the Rye Lane Conservation Area. This district owes a significant part of its charm to its 2/3 storey period houses. To build 4 storey blocks which are out of keeping with the rest of the area would be inappropriate. In an area which is highly built up and lacking in open space, and in play facilities for children, this is a fantastic opportunity to create a new park for the area. We would like to see the car park used as a park/open space for the local community. If there are any buildings they should be kept to a small number, eg no more than 10% of the park, and limited to 2/3 storey properties to complement the existing architectural setting. The signatories to the petition are: Claire Farrelly Noel Summerville Hugh Leach Katra Barnett Keith Hoy Jean ClarkM. McGann Fletcher Barber Dylan Kendle Jason Coc Amanda Russell Joy Green Vanessa Gash Luke Wyszynski Jeremy burden Robert Stephents Charlotte Kinaird Coln Barber Cawlyn Barradough Spephen Moss Jare Osborne Ruth Msyerowitz Roz Simpson Evie Wyld Clare Colvin Anan Moss roger Lobb Ted Littledale Vivienne Soan Mary Currie Polly Hunter Kate Burn Claire Sadler Catherine Bee Gill Lee Polly Ho-Yen Neil Dougherty Cherry Park Margaret Muhamed Kate Jones Rosemary Leddie Joan Mercer Mr Paterson Daniel Essex Joan Byrne Joe Smith Rupert Compston Matthew Salkezd Laura Timms Sarah Cole Jane Emery David Amor Lorna Amor Lisa Matthew Ruth Fielding Steve Kennedy G. Beskin N. Law J Nagle J. Hilton F Trinick D. Gord Simon Frusher Tim Bell Isabell Gregory Brett St Louis Victoria Watts Neil O'Sullivan Karen Harris Felix Lane Bronwyn Ormsby Haxel Bothma Francesca Ryan Anisista Peplinski Anrea Ptben Alistair Clarke Nettie Huntley Tom Skillito Paola Dazzan Rita D'Agostina Caronice Pariante Natacha Clarke Jon Wood Leo Tong Julie Arnold Cardula Von Derassa Sara Baroni Lisa Ghiggini Rowena Hill Chris Hill Theresa Adetoy Jasper Sutherland Silvia Baba Heal Helen Wood Scott Firth Emmiy Hayes Ian Cubitt A Amery Vicky ackroyd David hingham Sabrina Chaudhni Matthew Bloxidge Dan Morriss Gary Evans Murial Ebert F. Campbell Fiona Sweeney Fiona Barnett Ama Day Ellsa Kay Richard Mallfin Cress Fenneira Shara Cowling S. Strappini Sofia Scratton Simon Kerr Suz Johnston Amelia Scott Toni Edwards Sam Evans Ann Winn Clare Birchall Sarah	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.

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					Holmes Ben fletcher Ozaroff B. Hall Martyn Davies P. bower Kate Sherman L. Sessions S. Harrison Sandra Hesketh Pete Bowers Rev. Paul Collier Sandie Knight Don. Weniz A.J. Marshall Delia Dunford-Swirles Andre Dunford-Swirles Kate Parker Sonia Kidson Guy Robinson Lucy Carruthers Barry Jenkins Carolyn Izzard Miles Izzard Rebecca Wilmshurst S. Riley Joan Brown Hugh Leach Chantel Doyle Petr Abraham Emma Caldived Vesna Gulina Peter Gibson Violet Marriott Kate Shaw W. Magee Dora Jonsdottir Lyndsey Stringer Jo Beneusha Carolilne Stra Daniel Gittings Nicole King Cathy Hart Gill Moore Hugh Leach Bhauesh Morar Constine Boxall Jessica Hayes Joel Kite Grace Kite alan Skidmore Maurice Decapietah Adam Smith Stuart Wheeler gemma McCaonnell Anna Nelson-Smith S. Hart Shane Ranasinghe Jessica Wright Neil Watson Clay McCarthy Derek Kinrade Ann Danng Leah Prah Theo Turpin Coralie Allison Sarah Hiche Emma Cater Simon Thorp Hakim B Charlie Summerville Simon De Glanville Josh gaillemine Sam Warithy Max Thompson Isabel Thompson Mauan Tuna Angelita Brandney Dave Beale R Bowen Danielk Philpott Bethany Aylward Laverne Miller E Tdhill Micsreska Drohomieski P. Cullivan Jackie Barry Sophie Adreru Mawan Ross Tom Barry Anya Clover Edcuaro Clugh S Ashelford U. Munar M. Wheeler A. Rooiver C Batho Alex Friend C. Uppington M. Davy Natalie Margaret Hughes Travis Barker Eileen Conn Sean O'Hagan Robert White Jon Magidsahn Libby Dempster Juhi Davitt H Longman M. Mirza Le Postma Emily Beu Nick Birkett Isobel Taylor Paul Trueman Hannah Rogers Sam Fathi S. Wilnwon A.Clark J. Clark K. Inghall M. Shearer D. Foxford Polly Clegg Nicky Hirst Anna Gren C. Yapp Georgia Yapp George Groman Breda Duggan Sandra fevins Tim Pat Dufficy Vineeta Dufficy Somalee Murphy Emily Skeppner	
360	547				We object to the 'Major Town Centre' and 'Core Action Area' boundaries as shown in figures 16, 19, 20, 22 and 23 and request that the boundaries are amended to accord with the Major Town Centres boundary identified in the adopted Proposals Map.	We have updated the figures in the Preferred Option AAP. We have also amended the town centre boundary. The amended boundaries can be seen in the proposed amendments to the proposals map document which will be published alongside the Preferred Option document.
361	549	5.2-Stes for major develop ment;		5	We set out below representations to the Peckham and Nunhead Area Action Plan (AAP) Towards a Preferred Option document, on behalf of Notting Hill Housing Group (NHH). Notting Hill Housing is currently working closely with the London Borough of Southwark in relation to the delivery of key regeneration schemes within the Borough. These representations have particular regard to the Wooddene site, which is identified as 'Site 5: Site of the former Wooddene Estate' in the draft AAP. Site 5 Allocation: Former Wooddene Estate NHH supports the allocation of the Wooddene site in the AAP, which recognises the potential for redevelopment and regeneration of the site for residential development. The site provides an opportunity to make a significant contribution to providing new high quality homes in this area. The following comments are raised in relation to the allocation. Land Uses The allocation refers to "required land uses" being residential (Class C3), retail (Classes A1-A4) and business (Class B1) uses. It is acknowledged that these uses are all appropriate in this central area, as well those other uses including leisure and student accommodation which are identified as being "acceptable". However, the precise land use mix would be subject to review having regard to the site circumstances and viability taking account of surrounding uses. It is therefore considered that the allocation should refer to "preferred uses" rather than "required uses" to ensure additional flexibility.	Support noted. This is one of the key sites in the core action area and it is therefore necessary to specify what uses would be appropriate on the site. We identify a wide range of required and acceptable uses which will allow the site to be developed flexibly.
362	549	5.2-Stes for major develop ment;		5	Figure 32 It is noted that the site allocation includes "indicative development blocks" and "indicative number of building floors". It is acknowledged that this is indicative and the form of development would be subject to review having regard to a range of factors including surrounding context to ensure that the most effective use is made of the site. The indicative building heights are identified as being 3 to 6 storeys with an opportunity for a 'landmark building' at the corner of Queens Road and Meeting House Lane. The allocation also refers to this being a potential location for taller buildings front Queens Road. It is agreed that this location is appropriate for taller buildings and therefore this is welcomed. It is noted that the Issues and Options version of the draft Peckham and Nunhead AAP	The diagram has been amended to remove the indicative blocks. The reference to the site being suitable for a taller building is retained. More detail will be added at the next stage..

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					(2009) identified the site as a possible location for a '10-15 storey landmark building opportunity'. In addition, the preferred option in the Feasibility Study for the site (March 2007), prepared on behalf of the Council identified potential for a 21 storey landmark tower at the site. The appropriate building height would be subject to review of environmental, infrastructure and townscape considerations, with the potential to exceed 6 storeys along Queens Road, including a landmark building. It considered that this should be recognised in the allocation and that the "indicative building floors" are not treated as maximum heights.	
363	549		Policy 1	5	It is noted that the Peckham Major Town Centre boundary, as shown at Figure 14, is different to the boundary as set out on the LDF Proposals Map (April 2011), which previously included the Wooddene site, and this requires clarification. It is considered that the site at Wooddene, as a large development site, has the potential to contribute to the functions of Peckham Major Town Centre through its ability to provide high density residential-led development.	We have amended the town centre boundary to accord with the Proposals map. The Preferred Options sets out in Appendix B a schedule of proposals site including PNAAP5 – site of the former Wooddene estate guidance for the redevelopment of the site. The council have signed a contract with a registered provider to redevelop this site within the next two to three years and have acknowledged that The site will be key to facilitate regeneration in Peckham and Nunhead, being one of the earliest large sites planned for development.
364	549		Policy 20	5	NHH considers Option 2, allowing for parking provision in the Core Area, is more appropriate than option 1 which allows car free development only. Option 2 does not preclude the potential of considering car free development where appropriate and having regard to the circumstances of specific sites.	Support for option 2 is noted. Our preferred approach is to encourage car free residential development in Peckham core action area, but to allow schemes to include up to 0.3 spaces per unit where this level of parking can be justified through a transport assessment. As exceptions to this rule, we will allow disabled car parking and car club spaces to be provided. This approach is set out in AAP policy 15.
365	549		Policy 23	5	It is noted that the definition of affordable housing does not include the affordable rent product. In order to conform with recently updated national planning policy (PPS3, 2011), the definition of 'affordable housing' should be amended to take this into account. It is noted that Policy 23 requires a tenure split of 50% social rented and 50% intermediate. In order to ensure that development schemes are viable and deliverable, it is suggested that the tenure split should be applied flexibly in the context of site specific circumstances and scheme viability.	We have updated the fact box on affordable housing, which follows policy 17, to include the definition of affordable rent. Policy 17 in the AAP sets out our approach for Peckham and Nunhead which is for 50% social rent and 50% intermediate in accordance with the Core Strategy. Any departure from this approach needs to be fully justified. We took a report to planning committee which clarifies this approach which is now available on our website. We will continue to review our approach to affordable housing through the Affordable Housing SPD. The draft Affordable Housing SPD currently explains that we will consider scheme viability through a financial appraisal. This approach provides flexibility for schemes which do not fully meet the policy requirements. All proposals will be considered on a case by case basis.
366	549		Policy 31	5	The recognition that sites at landmark locations, including the Wooddene site, have potential for buildings to be taller is welcomed. The reference to building heights of 6-10 storeys should not be applied prescriptively. As stated above, it is considered that the proposed building heights set out in the draft AAP should be applied as guidelines with the appropriate height to be determined subject to review of environmental, infrastructure and townscape considerations.	Our view is that 6-10 storeys the most appropriate height for a tall building on this site. This is based on evidence that we have collected so far, including the Conservation Area Appraisal for Peckham Rye Lane, as well as the Characterisation Study. The characterisation study examines and analyses the make-up of the AAP area, its historic context and makes recommendations for future townscape opportunities, including the potential location of taller buildings. The methodology and approach used in this piece of work has informed our policies in the AAP and the characterisation study will be published as part of the evidence base for the preferred option. We will also be publishing a Tall buildings study as a further piece of evidence base work at the publications/submission stage of the AAP.
367	550				CIP Limited supports the identification of key challenges and opportunities within the Peckham action area, which will assist in focusing resources towards the comprehensive regeneration of the area.	Noted.
368	550				CIP Limited supports the objectives set out under Theme 1 'Enterprise and activity'. It is important that developments that increase employment and business opportunities in the area are supported in order that they strengthen the local economy and create job opportunities for local people	Noted.
369	550	3.3.1-			CIP Limited broadly supports the strategy for Peckham Town Centre, in which the	Noted.

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		Peckham town centre			Copeland Road Industrial Estate is located. Specifically, CIP supports the strategy to increase retail and business floorspace as well as new homes within the town centre. It is considered that this strategy will have a number of benefits for local people and meet a number of the Council's objectives including creating more homes in accessible locations; creating employment opportunities for local people; providing local business opportunities; creating a more vibrant town centre; and improving safety and security in the town centre. CIP Limited also supports the strategy to continue to improve public transport in the area, including the east London Line, which will be fundamental to bringing investment into the local area.	
370	550	3.3.1-Peckham town centre	Policy 1		CIP Limited broadly supports both options 1 and 2 under policy 1 (Peckham Town Centre). It is considered that Peckham, as Southwark's main town centre, has the capacity to accommodate a new retail quarter around Peckham Rye Station and Copeland Road. It is noted that the Council's own retail study highlights that there is demand from retailers and capacity for a higher level of both comparison and convenience floorspace. This strategy will expand the focus of the town centre from north to south, rectifying the existing situation, where town centre activity is focused at the northern end of Rye Lane and businesses at the southern end suffer. A new retail quarter around the station and Copeland road will increase footfall and activity in this part of the town centre. This will vastly improve the visual appearance of this part of Peckham, help to support existing businesses in this part of the town and will also improve safety and security through increased activity and a more pleasant environment.	Support noted. We have set out in our Preferred Options Policy 1 that we will promote the majority of additional retail floorspace on the larger town centre sites which include Aylesham Shopping Centre (PNAAP 1); Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6) and Land between the railway arches (PNAAP 3).
371	550		Policy 8		CIP Limited supports the options 1 and 2 for policy 8 (Business Space), through encouraging investment to the area and through growth in housing and retail, it is also considered that there is some capacity for office accommodation within the town centre and close to the station. This will ensure that businesses have good access to public transport and through the improvement of the wider town centre, will also have access to a range of local services, which in turn will be supported by local business.	Support noted. We will be undertaking further work to refine the capacity analysis for the identified proposal sites before we consult on the next stage of the PNAAP.
372	550		Policy 21		CIP Limited supports the Council's policy to increase the number of homes in Peckham town centre. As well as making a significant contribution to meeting housing need, new homes in the town centre will also act to improve safety and security by increasing activity in the town centre at different times of the day. In addition, residents will have good access to public transport links, as well as local services and facilities.	Support noted.
373	550		Policy 22		The policy does not, in accordance with the London Plan (paragraph 3.28), recognise the need to optimise the potential of sites and that it is not appropriate to apply densities mechanistically. The policy should recognise that other factors need to be taken into account in determining appropriate site densities, such as local context design, transport capacity (both existing and planned) and social infrastructure. In addition, it is noted that the policy states that these densities can only be exceeded when developments are considered of exemplary design. However, exemplary design is not defined in this SPD. In addition, this is at odds with the London Plan, which states that issues such as local context, design, transport capacity and social infrastructure should also be factors of consideration. SUGGESTION: In accordance with the London Plan (paragraph 3.28) the policy should recognise the need to optimise the potential of sites and that it is not appropriate to apply densities mechanistically. Other factors need to be taken into account in determining appropriate site densities, such as local context, design, transport capacity (both existing and planned) and social infrastructure. Exemplary design should be removed as a measure for appropriate densities as all development is required to be of a high quality design	Our approach to density is set out in the adopted Core Strategy, including the map which figure 24 is taken from. The density ranges are quite broad and the density of new development will have to reflect the local area as well as the relevant policies in the AAP, the Core Strategy and the Saved Southwark Plan. Policy 3.11 of the Saved Southwark Plan sets out the factors that new development should adhere to, including local context. A cross-reference to our Residential Design Standards SPD has been added to the supporting text. Section 2.2 of the SPD sets out the criteria that developments are expected to meet before their design is considered exemplary. The inclusion of exemplary design as a factor in determining densities is in line with Core Strategy policy 5. A cross-reference to Saved Southwark Plan policy 3.11 Efficient use of land has been added to clarify our approach to determine whether the potential of a site has been optimised. The GLA agreed that the density ranges in Core Strategy policy 5 are in conformity with the London Plan before the EIP. The AAP policy follows the same approach.
374	550		Policy 23		The policy makes no reference to affordable rent, which now forms part of the definition of affordable housing in national guidance (Planning Policy Statement 3). It is considered that the Council need to refer to this type of affordable housing in the policy in addition to social rented and intermediate housing and in accordance with the definitions set out in PPS3.	We have updated the fact box on affordable housing, which follows policy 17, to include the definition of affordable rent. Policy 17 in the AAP sets out our approach for Peckham and Nunhead which is for 50% social rent and 50% intermediate in accordance with the Core Strategy. Any departure from this

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					The policy does not reflect the need to take into account individual site circumstances (including development viability), the availability of public subsidy and the implications of phased development, as set out in part B of Policy 3.12 (Negotiating affordable Housing on Individual Provide Residential and Mixed Use Schemes) when negotiating appropriate levels of affordable housing. CIP Limited note and support the Council's objective to provide a higher level of intermediate housing to create greater housing choice within Peckham. SUGGESTION: The policy needs to refer to affordable rent as a type of affordable housing in addition to social rented and intermediate housing in accordance with national guidance. In addition, the policy should refer to the need to take account of individual site circumstances (including development viability), the availability of public subsidy and the implications of phased development, in accordance with part B of Policy 3.12 (Negotiating affordable Housing on Individual Provide Residential and Mixed Use Schemes) when negotiating appropriate levels of affordable housing.	approach needs to be fully justified. We took a report to planning committee which clarifies this approach which is now available on our website. We will continue to review our approach to affordable housing through the Affordable Housing SPD. The draft Affordable Housing SPD currently explains that we will consider scheme viability through a financial appraisal. This approach provides flexibility for schemes which do not fully meet the policy requirements. All proposals will be considered on a case by case basis.
375	550		Policy 25		CIP Limited considers this policy to be onerous considering the nature of certain development sites within the Peckham Action Area. It should be recognised that certain areas and certain sites are more suited to family housing than others. This means that some sites will be more suited to deliver higher levels of family housing than others. The requirement that 20% of all housing in the core action area be family accommodation which must have direct access to private amenity space and play space is onerous and it is likely that it will not be suitable or deliverable on all sites within the action area. The policy does not recognise that Peckham is bounded by two of the borough's major parks (Burgess Park and Peckham Rye) which provide fantastic outdoor recreation opportunities for families within the local area. SUGGESTION: The policy should recognise that not all sites within the core area are suitable for high (20%) levels of family housing. In addition, the requirement that all 3 bed plus units should have direct access to outdoor amenity space should be removed. The policy should recognise that the action area is bounded by two of the boroughs major parks which offer opportunities for outdoor recreation.	Our approach to family homes is consistent with the adopted Core Strategy. We recognise that the Core Area will be less able to provide family housing and this is reflected in the 20% target, rather than 30% which is applied in the South of the AAP area. In addition, the Strategic Housing Market Assessment and the Housing Requirements Study both identify a particular need for family housing.
376	550		Policy 29		Whilst CIP Limited do not object in principle to a Combined Heat and Power system, this has to be based on a thorough feasibility study, including an assessment of viability and impact on developments. It is encouraging that the Council have stated their intention to do this work before onerous requirements are placed on development. We would welcome the opportunity to comment further on this issue once this information is available.	A draft Peckham Energy study has been prepared and will be consulted alongside the preferred option Peckham and Nunhead AAP. We have set out a policy in energy in the preferred option AAP (policy 20) which states that we will; • Expect all development to apply the energy hierarchy as set out in the London Plan. • Require all major developments to evaluate the feasibility of connecting to existing heating and cooling networks and Combined Heat and Power (CHP) systems. Where a new CHP system is appropriate proposals should also assess the feasibility of extending the system beyond the site boundary to adjacent sites. Where practical and viable, developments will be required to connect to existing or future networks. • Require all development to be future proofed and designed to be capable of connecting to a future CHP/communal heating network.
377	550		Policy 33		CIP Limited support the identification of broad locations for tall buildings. It is considered that appropriately located tall buildings can be positive in place making and regeneration terms. CIP Limited consider that well designed tall buildings within Peckham town centre will increase its prominence and boost regeneration.	Support noted.
378	550	5.2-Stes for major develop ment;		1	The Council have referred to opportunities to relocate the cinema on other sites within the town centre. It is not explained why this site would not also be potentially suitable for this use. SUGGESTION: Include a statement that identifies this site as a potential location for a cinema	The acceptable land uses have been amended to include leisure and community uses which could include a cinema.
380	550	5.2-Sites for major develop ment;		2	Under key opportunities it states that there is an opportunity to diversify retail offer on the town centre with a range of unit sizes. For the Copeland Road Industrial Park site it also states this but with the further requirement that it should include non-food retail. There is no explanation as to why the retail requirements on site 2 and site 3 should be different. As such, they should both have consistent wording in this regard. This states that the building is a potential location for a tall building but this is not shown on the figure 31. It is	The amount of detail in the site descriptions has been reduced. There is no longer a reference to food or non-food retail.

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					considered that this is the correct approach. If a location is broadly acceptable for a tall building then exact locations should be determined through the design and planning process. SUGGESTION: Either amend site 2 to read: Opportunity to diversify retail offer in the town centre with a range of unit sizes and types of retail to include non-retail. OR amend site 4 to read: Opportunity to diversify retail offer in the town centre with a range of unit sizes and types of retail to include non-retail.	
381	550	5.2-Stes for major develop ment;		4	CIP Limited support the identification of this site for a mix of residential, business, retail and cultural uses as it is considered that the redevelopment of this site represents a significant and exciting opportunity within the town centre to meet a number of the Council's objectives for the area and to make a significant contribution to the regeneration of Peckham. Notwithstanding this, CIP Limited have some comments relating to the detailed wording of this part of the area action plan. Under key opportunities it states that there is an opportunity to diversify retail offer on the town CIP Limited support the identification of this site for a mix of residential, business, retail and cultural uses as it is considered that the redevelopment of this site represents a significant and exciting opportunity within the town centre to meet a number of the Council's objectives for the area and to make a significant contribution to the regeneration of Peckham. Notwithstanding this, CIP Limited have some comments relating to the detailed wording of this part of the area action plan. Under key opportunities it states that there is an opportunity to diversify retail offer on the town appropriate site for a tall building due to its relationship with the station on the opposite site of the road. A tall building in this location would mark an entrance to Peckham from those travelling to the area by rail or overground services. SUGGESTION: Either amend site 2 to read: Opportunity to diversify retail offer in the town centre with a range of unit sizes and types of retail to include non-retail. OR amend site 4 to read: Opportunity to diversify retail offer in the town centre with a range of unit sizes and types of retail to include non-retail. Identify student accommodation as another acceptable land use.	Support noted. Much of the detail relating to the site has been removed, including reference to food on non-food retail. Student accomodation has been added to other acceptable land uses on the site.
382	550	6-Deliverin g:workin g together to make it happen			CIP Limited welcome the Council's stated intention to work with CIP Limited in bringing forward the Copeland Road Industrial site for a mixed use development that will make a significant contribution in meeting a number of objectives for the regeneration of Peckham	Noted.
383	552	5.2-Stes for major develop ment;		14	The Idea of building 4 storey blocks on the Choumert Grove Car Park is madness for the following reasons: a) Concentrated high raise building, without allowing an area to `breathe`, always leash to an increase in crime. There are no outlets, for the young especially to `exercise` b) Street parking in the area is already a a premium. If you close the car park it will become impossible c) The shops in the area rely on the car park for business, especially over the weekends when they come from afar for bulk buying. Close the car park and several local shops will collapse through lack of trade. d) The car park is essential for worshippers at the local mosque, especially on a Friday e) The car park has been used several times in the past for emergency helicopter landings. f) The car park is in a conservation area where high rise buildings are prohibited g) If the car park has to be close for reasons unknown to us, then some form of community recreation facilities could be more usefully built on it . There has been extreme local anger at the prospect of losing the car park and numerous campaigns and petitions launched to prevent it. Do we live in a democracy or an arrogant dictatorship? I'll leave you to answer that.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP.
386	553		Policy 3		There are too many of the same type of hot food takeaways, namely southern fried chicken. There should be more variety and no more chicken places.	We have set out in the Preferred Options policy 4 (Hot Food Takeaways) that we will restrict further growth of A5 use. This includes the two approaches of

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						establishing a 400m exclusion zone around secondary schools and limiting the number of hot food takeaways to 5% and also preventing clustering of A5 units in Peckham and Nunhead town centre protected shopping frontages.
387	553		Policy 19	2	If the multi-storey car park isn't used perhaps it should be demolished and the site put to better use.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years.
388	553		Policy 1		I'd like to see more variety of shops in Peckham town centre. There are currently seven or eight types of shop/business replicated along Rye Lane from the station southwards: butcher, fishmonger, mobile phone shop, fruit and veg stalls, hairdresser / nail bar, poundshops, hair product shops, southern fried chicken shops. These all tend to be downmarket and messy, with rubbish spilling on the street. Some shop units are in a v bad state. A new off licence has opened in the arches in front of the station, and the window was broken before it opened. How can shops in this state be legally rented out? Rye Lane is often full of rubbish at all hours. Shop owners do not take pride in their environment. I have seen shop owners, staff drop litter on the street as they know it will be cleaned eventually. It's a disgrace. Can we have some more upmarket, well known shops as well as the existing, so that there is something for everyone and not just the local African population. There is nothing open at night and Rye Lane becomes a ghost town, despite being so busy in the day. There are no coffee shops on Rye Lane.	We have set out in our Preferred Options Policy 1 that we will promote and maintain a vibrant balance of uses along either side of Rye Lane and Peckham High Street to help strengthen the shopping environment. The Council's Retail Capacity Study (2009) which has informed our draft policies, identified that there is some scope to improve the comparison goods shopping and also provide a limited amount of convenience goods retailing within the town centre to retain and strengthen Peckham's market share. The study included an in-centre survey which cited the poor range of either comparison retailers, foodstores, restaurants/cafes or the poor range of department stores as their primary dislike of the centre, Through the promotion of new retail floorspace in the town centre this will help ensure local people have access to a better range of shops and services and reduce the need to make trips to other centres to do their shopping. We have also set out in our Preferred Option policy 2 that we will promote the provision of more cafes and restaurants, leisure and entertainment uses to help make Peckham a better place to go out in the evening. We also want to promote more arts/cultural uses in the area to build on Peckham's reputation as a creative hotspot in London and to help generate new jobs and contribute to the vitality and variety of the town centre. The Preferred Option policy 1 sets out that the objective for Rye Lane's existing retail parades is to strengthen them by promoting and maintaining a balance of different uses, to help improve the shopping environment. We want to increase the versatility of the retail offer in the area and we know through our evidence gathering that there is scope to improve comparison goods shops (clothes, books, shoes, household goods etc).
389	554		Policy 1	6	I support the idea of a new square outside Peckham Rye station, new markets/ retail in the arches behind the station and a new copeland art quarter. There should not be too much new retail as there is a lot of empty shops.	Support noted.
390	554		Policy 2		New bars and restuarants should be encouraged but only on the high street and the copeland quarter.	We have set out in our Preferred Option policy 2 that we will promote the provision of more cafes and restaurants, leisure and entertainment uses to help make Peckham a better place to go out in the evening. We also want to promote more arts/cultural uses in the area to build on Peckham's reputation as a creative hotspot in London and to help generate new jobs and contribute to the vitality and variety of the town centre.
391	554		Policy 19		The amount of car parking should be reduced, there is far too much. No more developments should have car parking spaces and the council car parks should be free to people with resident permits who live near the core area where it is hard to park in the street.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP.

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						Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. New developments will be required to comply with the maximum car parking standards set out in Appendix 15 of the Southwark Plan and in the London Plan. We will encourage car-free development, particularly in the core action area. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years.
392	554		Policy 24		There is a very high % of social housing in the area. Although I agree with the idea of social housing I think the area would benefit from more private housing to increase the number of better off people who pay council tax and spend money in the local area.	The Core Strategy introduced the percentage approach to the proportions of type and tenure of housing. The AAP repeats the approach and sets a numerical target for the number of new homes. The AAP target is for 35% private housing as well as 35% affordable housing to balance the housing types in the area and meet local need.
393	554		Policy 1		The area next to the Pulse and Libary should be developed into a a park with more trees and flowers, the canal should be a wild life haven and better separation between cyclists and pedestrians should be created.	We have set out in Appendix B the Preferred Options proposal site descriptions. We promote the redevelopment of PNAAP 10 – Eagle Wharf which is the site adjacent to the library. We have set out that development on the site should strengthen the civic cluster of buildings and increase pedestrian links to Peckham Square and improve and increase the public realm provision in the town centre. The objective is for the redevelopment of the site to increase the use of the square through the provision of new cultural facilities, including being a suitable location for a cinema. This will help reinforce the square as a cultural focus for Peckham. Our objective is to also promote a network of high quality and easy to access open spaces that serve a range of functions, including recreation and children's play, sports facilities, nature conservation and food growing. Through Preferred Option Policy 19 we will require new development to improve the overall greenness of the area, through planting street trees, creating living roofs and walls and providing habitats for wildlife which increase biodiversity
394	554		Policy 31		I think we need to be careful large buildings dont dominate those around them and have some civic use as well as residential.	Policy 25 sets out that the location of tall buildings will be assessed on a variety of factors such and surrounding context and historic character. Mixed uses are encouraged, particularly within the core action area.
395	554		Policy 4		The owners of the empty buildings above shops should be forced or encouraged to use them and the same for empty buildings around the area.	Support noted. Our preferred approach set out in Policy 1 is to support proposals which bring vacant upper floors above ground floor shop units in Peckham town centre back into use. To ensure there is a balanced mix of uses in the town centre we have set out a number of criteria in our preferred option for Policy 1 which will ensure the proposed use is acceptable and increases the vitality of the town centre.
396	554		Policy 19	14	The car park on Choumert Grove is often 3/4 empty and at least half should be used for a mixed use development.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years.
397	554		Policy 1	5	The station should be a priority as it gives a bad impression of the area. Historic buildings should be renovated and used, the copeland rd cultural quarter, should be encouraged, the arches behind the station should be developed, the old waiting room should be renovated, we need less car parks, less take aways, better street cleaning, flexibility in planning to allow more fun, pop up and experimental things like the car park roof top bar.	We have set out in our Preferred Option general support for new markets and street trading areas in Peckham town centre to help add to and increase the variety of retail offer. We have not identified a preferred site for a new market, however have identified the land to the rear of Peckham Rye station could be a possible location for further consideration.
398	555		Policy 25		I think the targets for larger homes aren't ambitious enough	Our approach to family homes is consistent with the adopted Core Strategy. In the AAP we recognise that we need to balance the different needs in the area

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						and provide for a range of sizes and types of new homes.
399	555		Policy 15		better cycle lanes e.g. from morrison's to nunhead	The AAP supports improvements to the local cycling environment. Our broad priorities are set out in policy 11 and more local issues are detailed in Section 5, which focuses on the different character areas. The policies, in accordance with the council's Transport Plan, specifically refer to prioritising improvements to links between key destinations such as Peckham town centre, Nunhead local centre, stations and schools.
400	556		Policy 10		There are existing facilities such as libraries and leisure facilities that need to be strengthened and supported to ensure maximum use from it community.	Our preferred option policy 7 sets out that we will encourage better uses of community facilities that are currently under-used and we will require flexible community space in new developments so that different groups can share the spaces to meet a wide range of needs. Section 106 planning obligations are used to ensure the delivery of key infrastructure and to mitigate the impact of development. We have an adopted planning obligations supplementary planning document which explains our approach to section 106 in more detail. We will be preparing a Community Infrastructure Levy over the next two years which will be a new charge to help fund new infrastructure. Later this year we will carry out the first stage of consultation on our CIL. We will provide more detail on our approach and how it links with the AAP at the next stage next of consultation on the AAP.
401	556		Policy 20		Spaces for cars are essential if you have a family or a disabled person in your household. Car are an important if our lives and for many are a neccessatiy.	Our preferred approach is to encourage car free residential development in Peckham core action area, but to allow schemes to include up to 0.3 spaces per unit where this level of parking can be justified through a transport assessment. As exceptions to this rule, we will allow disabled car parking and car club spaces to be provided. In the urban and suburban zones, some limited car parking will be acceptable. This approach is set out in policy 15. Where a development includes a number of units that are targeted at families, we will expect this to be addressed in the transport assessment. The maximum car parking standards set out in the London Plan will also apply to development throughout the borough.
402	556		Policy 31		New development should be no taller than 6 storey high. This is much more safer, easier and effective way of living. People feel very vunerable living in high rise buildings. This inturn will getto-ize areas which would enable gangs/groups to target.	Our approach to tall buildings is set out in policy 25 of the Preferred Option. Our approach identifies sites that are suitable for a tall building to ensure that other, more sensitive locations are protected. Our approach is also based on evidence such as the relevant conservation area appraisal and the characterisation study which examines and analyses the current make-up of the AAP area, its historic context and makes recommendations for future townscape opportunities, including the potential location of taller buildings. We will also be publishing a Tall buildings study as a further piece of evidence base work at the publications/submission stage of the AAP.
403	557	3-Vision and objectives	Policy 9		I think the environmental option should be the most important since now traffic and air pollution is unbearable in large parts of Peckham and Nunhead!	We have set out objective N3 in the preferred option Peckham and Nunhead AAP, to reduce the impact of development on the environment and help tackle climate change, air quality, pollution, noise, waste and flood risk. This includes the impact from increased transport as a result of new development. We have also set out an additional policy on waste, water, flooding and pollution in the preferred option AAP (policy 21) which sets out how we will ensure development meets the highest possible environmental standards. Our sustainability appraisal has tested all of the policies set out in the AAP looking at the social, environmental and economic impacts to ensure that new development occurs in the most sustainable way possible.
404	558	2-Peckham and Nunhead	Policy 1		I understand that the council is a large freeholder of buildings in Rye Lane, Peckham? The condition of these buildings is outrageous. The council needs to force leasholders to comply with their leases ensure that they are maintained properly.	We have identified in Section 5 of the Preferred Options (Peckham Core Action Area character area) that whilst parts of Rye Lane have a strong character and identity particularly when you look up above the shop frontages, much of Peckham core action area has suffered from neglect and is in need of some investment. The linear Peckham Road/Peckham High Street/Queens Road has

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						suffered from decline, with many run-down buildings. Our policies on design and heritage (Policies 23-26) set out requirements for ensuring good quality design and protecting our important heritage. They will ensure that new development improves the look and feel of Peckham and Nunhead. Our Preferred Options Policy 29 for Peckham core action area, which includes Rye Lane, seeks to ensure that the design of new or refurbished shopfronts considers the policies set out in policy 24 and relevant guidance in the Rye Lane Peckham conservation area appraisal.
405	558		Policy 32		If you want to improve the lives of Peckhamites, the only way to smarten it up so that decent people and families move adn stay to the area. This means that you need to restore the Victorian integrity and look of the buildings and streets.	The Rye Lane Peckham and Peckham Hill Street Conservation Areas were adopted on 18 October 2011. Section 5 of the Preferred option AAP includes five new character area visions setting out the character, opportunities and policies for each. These area-specific policies show how we will ensure that new development in Peckham and Nunhead is of the highest design whilst being appropriate to context and character. We have commissioned a characterisation study which is a piece of work which closely examines and analyses the make-up of the AAP area, its historic context and makes recommendations for future townscape opportunities. The methodology and approach used in this piece of work has informed our policies in the AAP and the characterisation study will be published as part of the evidence base for the preferred option.
406	558		Policy 32	6	The condition and maintenance of Peckham Rye Station areas and Rye Lane is a scandal. The buildings are historic and yet the whole neighbourhood looks like it is in the developing world.	We have included more detailed policies within the preferred option. Policy 23 sets out policies on public realm which will help to ensure that there is a high qualityu of public square, streets and spaces. Policy 26 on heritage provides further detailed policies. Much of Peckham town centre, including much of Rye Lane is now also protected as part of Rye Lane Peckham conservation area. Additionally we are looking at ways to invest money into Peckham town centre, and have recently been awarded money from the GLA regeneration fund to improve Peckham Rye Station. We have also applied for Townscape Heritage Initiative funding to improve the shop fronts along Rye Lane.
407	558		Policy 1		Cheap ethnic shops all selling the same things, cheap street furniture and cheap new paving do not make a good place to live	We have set out in our Preferred Options Policy 1 that we will promote and maintain a vibrant balance of uses along either side of Rye Lane and Peckham High Street to help strengthen the shopping environment. The majority of new retail provision will be on the large development sites identified in Policy 1. There is scope to provide more comparison goods shopping (i.e. clothes, shoes, books, household goods etc) in Peckham town centre. More of these types of shops will help to create a more diverse shopping environment. Our Preferred Options Policy 29 sets out we will improve the quality of existing major pedestrian thoroughfares such as Rye lane, Peckham High Street and Queens Road to provide a more pedestrian friendly environment which will include improvements to the public realm.
408	558		Policy 24		Upmarket private residential houses and apartments are need to bring in people that will contribute and add to the current poor ethnic neighbourhoods.	The Core Strategy introduced the percentage approach to the proportions of type and tenure of housing. The AAP repeats the approach and sets a numerical target for the number of new homes. The AAP target is for 35% private housing as well as 35% affordable housing to balance the housing types in the area and meet local need.
409	559	3-Vision and objectives			The vision needs greater and more radical aspiration. Peckham is a unique urban neighbourhood. The base of a diverse and multi ethnic fabric that could be channelled to make something great. The area needs a large anchor public project from which private investment can then flow in behind. The choice of anchor project will dictate the theme of future investment and development. I personally believe a large iconic Architectural Gallery exploring the development of Urban culture housing exhibits on street art, free running, urban decay and renewal, the journey of immigration and integration etc etc, would bring in outside visitors. Look at PS1 or the tenement museums in New York for inspiration but this	The vision has been updated and reflects this. We have also introduced a section on the character areas of Peckham and Nunhead. Each section has its own vision and a set of locally specific objectives.

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					would be something completely new. A must see sight in the heart of this vibrant community linked to central London by the overground and a developed greenway using the surrey canal.	
410	559	3-Vision and objectives			Again the objectives need greater more inspirational scope. More than just being proud about the area the neighbourhood needs to shout "come and visit me and learn something new"	We have updated the vision and the policies on town centre uses in the AAP which set out our aspiration for the area, particularly for new cultural uses in Peckham.
411	559		Policy 32	6	The new market should occupy the area between the railway viaducts in front of Peckham Rye Station currently occupied by DR scaffold Group. It is VITAL that this area is saved and preserved and NOT built on. The historical cobbles and old tram tracks need to be retained. The area is incredibly atmospheric. Reveal the large majestic and gritty Victorian railway arches and open up the space creating direct line of sight with the fine frontage of Peckham Rye Station. The noise of the trains, add to the atmosphere and the space is superior even to Borough Market. OPEN IT UP AND USE IT please do not build on it and loose it forever.	The site referred to is currently a proposal site: PNAAP 3: Land between the railway arches (East of Rye Lane including railway arches). The site guidance for our proposals sites Appendix A: Schedule of proposals sites outlines guidance for each site. Our intentions for the site are to open it up and create better links through the railways arches. Located within the Rye Lane Peckham conservation area, the AAP acknowledges that development on this site should seek to conserve and enhance the wider heritage setting. Saved Southwark Plan policy 3.18 provides policy on the historic environment. This policy would be applied to this site including taking into account its historic setting. In addition this site is within Rye Lane Peckham conservation area, which recognises its historic importance.
412	559	5.2-Sites for major development;		3	I strongly DO NOT agree that the area between the Victorian viaduct east of Peckham Rye Station, occupied by DR scaffolding group and currently identified as Site 3 'opportunity for taller buildings' 10 floors!, should be built on. This would ruin this historical atmospheric and beautiful site that could be the key to unlocking Peckham's potential. PLEASE DO NOT BUILD ANYTHING ON THIS SITE. instead develop the railway arches and create a market or cultural quarter with links to the south towards the Bussey building and north towards the cinema. The Bussey Building and this area are unique and should be Grade II listed. The industrial area to the south of the Bussey building is the perfect location for the anchor project gallery/ museum of urban culture and taller building could be built around but not in this core area.	Noted.
413	562		Policy 1	6	The area around the station is in desperate need of improving and regenerating. Also Choumert Rd Market needs desperate attention - probably needs to be moved and no parking in this area!	We are also working with Network Rail and the Greater London Authority to open up the space in front of Peckham Rye Station to create a new public square in the heart of Peckham. Choumert Grove car park has been identified as having spare capacity, but due to its central location, its use is expected to increase as the town centre grows. Consultation on the previous stage of the AAP has highlighted an overwhelming level of local support for not developing Choumert Grove car park. We have set out we will retain the car park in our Policy 14 of the Preferred Options.
414	562		Policy 18		need to get rid of most/if not all of the one ways around Bellenden and east of peckham rye. Also change priority at the end of Chadwick rd where it contacts with Bellenden rd - very dangerous to cross!	Key road network improvements are now set out for the individual character areas in Section 5. The projects referred to here have been developed as a result of transport modelling work that considered the potential traffic impacts of the development proposed through the AAP. They are our current priorities and have committed funding to deliver them. We will continue to monitor the operation of the road network and determine new priorities for improvement, in conjunction with the local community, over the lifetime of the PNAAP.
415	562		Policy 1	6	Please can this start soon. Rye lane and the surrounding area is in desperate need of improvment. Around the station should be a square with cafes and small shops. Choumert Rd market is a mess and needs to be moved. That area needs improving and no parking should be aload in that area. The one ways need to cease and wider paths are required. If east of rye lane is going to be two way roads should rye lane be one way - not enough room on teh paths for pedestrians.	We have set out in our Preferred Options Policy 1 that we will promote the majority of additional retail floorspace on the larger Peckham town centre development opportunity sites which include Aylesham Shopping Centre (PNAAP 1); Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6) and Land between the railway arches (PNAAP 3) and we will also promote and maintain a vibrant balance of uses along either side of Rye Lane and Peckham High Street to help strengthen the shopping environment. We promote more A (A1/A2/A3/A4) B and D use, including retail, cafes, restaurants, arts, cultural, leisure, entertainment, office and community facilities to help regenerate

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						Peckham town centre, providing attractions for everyone to enjoy. We are also working with Network Rail and the Greater London Authority to open up the space in front of Peckham Rye Station to create a new public square in the heart of Peckham. Choumert Grove car park has been identified as having spare capacity, but due to its central location, its use is expected to increase as the town centre grows. Consultation on the previous stage of the AAP has highlighted an overwhelming level of local support for not developing Choumert Grove car park. We have set out we will retain the car park in our Policy 14 of the Preferred Options. We will continue to work with Transport for London and other partners to manage traffic movement and congestion and to improve accessibility and safety for all. Whilst there have been some recent improvements to Rye Lane we have identified in the Preferred Options that more high quality links are needed, particularly east-west through the town centre to make active travel more convenient, enjoyable and safer and also improving the quality of the existing pedestrian thoroughfares such as Rye lane, Peckham High Street and Queens Road to provide a more pedestrian friendly environment.
416	563	Other			In general these plans seem to be an excellent set of proposals to improve Peckham, balancing the vibrant diverse community and the need to modernise and improve. BUT the one thing that doesnt seem to be addressed is persistent criminal and anti social behaviour in the Meeting House Lane area. The row of shops at the junction with Montpellier Road has been occupied by a Turkish Cypriot gang who sell drugs openly on the streets and in shops. Nothing has been done about this criminal activity. In addition they use the surrounding streets for light industrial import and export from large vans, using the pedestrian workways as a space to unload making it impossible for residents to use them. They are an unpleasant and unwanted physical presence in a residential area. The local police team seem unable to tackle this highly visible crime. Until it is tackled it is going to be very hard for Peckham to shake the negative aspects of its image, and will significantly limit the impact of the investment/action plan being proposed by Southwark. If you don't feel relaxed and confident walking the streets no amount of improvement to the physical space will make any difference. I am happy to discuss this further.	We have included a new section on Character Areas which includes specific information, issues and opportunities for each area within the action area. Meeting House Lane is with the Peckham East character area. The section on Peckham East refers to the protection of the shops along the Lane to encourage activity and movement which will help to reduce anti-social behaviour.
417	564		Policy 32	6	It is vital to regenerate around Peckham Rye station. I am strongly in favour of opening up the old waiting rooms, the old staircase and the piazza in front of the station with new retail units and a new public space with improved connections to buses.	Noted. The site referred to is currently a proposal site - PNAAP 6: Peckham Rye Station. Appendix A: Schedule of proposals sites outlines guidance for each site. The consultation on the AAP has at every stage highlighted the support for improving the station and removing the existing forecourt buildings. This is one of the key aspirations of the AAP that will help to transform the area. We are working with the GLA and Network Rail to deliver our aspirations for the station. Southwark Council have publicly announced that it will be funding some of the improvements to the station and forecourt. In addition, in January 2012 the Council was successful in its bid for money as part of the GLA Regeneration Fund to assist those areas affected by the 2011 riots. Within the bid the key proposal is to create public square in front of the listed station building as well as making improvements to the station building itself. We will provide more information on the implementation of this project at the next stage of consultation.
418	565		Policy 18		I do believe Asylum Road should not be a cross-through road anymore. The access should be modified by Queen's Road Peckham station, in order to just to let the P12 bus and the vans accessing the day-care centre to go. Why? This will be fitting into the larger Peckham and Nunhead action plan to improve the Queens Road corridor as a gateway into Peckham. It will make it safer to access the station. It will enable higher quality business to thrive around. This is why I do believe Asylum Road should not be a cross-through road anymore and this should be deal with before the extension of the East London Line to Queen's Road Peckham. Parking should also be regulated on Asylum Road.	Key road network improvements are now set out for the individual character areas in Section 5. The projects referred to here have been developed as a result of transport modelling work that considered the potential traffic impacts of the development proposed through the AAP. They are our current priorities and have committed funding to deliver them. Further improvements may be delivered through s106 funding or through other external funding. We will continue to monitor the operation of the road network and determine new priorities for improvement, in conjunction with the local community, over the lifetime of the PNAAP. There are no current plans to regulate parking around Asylum road. Any

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						future changes would be subject to consultation with the local community by our transport team.
419	513	5.2-Stes for major development;	Policy 19	14	I do not agree with the proposal to build housing on Choumert Grove car park. This would be far better as a valuable open/green space. Furthermore I am concerned about the volume and type of traffic that has to come down Chadwick Road from the car park - this narrow street is already busy enough. Many vehicles (including the P13 bus) come down this road as they currently have no choice owing to the design of the one-way system.	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. We are currently consulting on an open space strategy for the borough. The strategy is underpinned by an audit of the borough's open spaces. The Choumert Grove car park is not identified as a possible open space for designation and protection in the strategy. Our approach to open space in Peckham and Nunhead is set out in policy 19 of the AAP. Reviewing the operation of the two one-way systems around Bellenden Road has been identified as a priority and has funding committed to the project. This is set out in the West Peckham Character Area, Section 5.4. This followed transport modelling work that considered the traffic impacts of the development proposed in the AAP. We will continue to monitor the operation of the road network and determine new priorities for improvement, in conjunction with the local community, over the lifetime of the PNAAP
420	568	3-Vision and objectives			I don't like these "yes/no" options. The visions and objectives sound laudable enough, it's just that I would much rather more of an emphasis on minimal intervention, by retrofitting existing buildings and infrastructure for maximum efficiency and sustainability...just not DOING so much demolition and re-build.	The Preferred Options document includes new policies covering sustainability. All development in the area will also have to meet the sustainability policy in our Core Strategy which sets targets for achieving higher levels of sustainability.
421	568		Policy 9		"The way these options are presented make them difficult to disagree with. E.g. how could one prefer low quality open space as opposed to "high quality" ones mentioned in question 12? but my questions would be; 1.) what is meant by "high quality" 2.) how is this to be achieved? Things take on a quality of their own given time, and people find ways round things. I feel that local authorities sometimes feel the need to much to be seen to be doing something/building something new, re-shaping, controlling....And as far as nature conservation goes, sometimes by far the best thing for wildlife is just to leave the space well alone. Re-building/re-designing takes an lot of resources and time, and I feel is not always for the better. "	Our draft open space strategy sets out further information on the quality and value of protected open spaces. Quality has been assessed using a number of different factors including the range of facilities provided as well as feedback from local residents. Our draft open space strategy sets out an Action plan showing how we will improve the quality of protected open spaces. We are consulting on this alongside the AAP.
422	568		Policy 18		Re. Q. 21...making it easier to travel around Peckham might increase car use, which I would not be in favour of.	Noted. The Core Strategy and the Transport Plan both stress the council's commitment to sustainable transport and encouraging alternatives to private car use and the policies in the AAP promote a variety of travel options, particularly encouraging active travel such as walking and cycling. However, it is important to strike a balance and some targeted improvements to the road network are necessary to improve vehicle flows, reduce congestion and improve the local environment for people in Peckham and Nunhead.
423	568		Policy 21		I would always favour using, adapting, retrofitting existing building for habitation over building new ones. Encouraging housing co-operatives might be a good way to achieve this.	Development in the area will have to meet the policies on sustainability set out in the Core Strategy, the Southwark and in the AAP. Encouraging housing co-operatives is too detailed a proposal to add into the Aap.
424	568	3.3.3-Peckham neighbourhoods	Policy 9		Please protect Kirkwood nature garden adjacent to Cossall Walk, Cossall Estate.	We are proposing to amend the boundary of OS108 to include Kirkwood Road Nature Garden as protected Borough Open Land (BOL). Saved Southwark Plan policy 3.27 sets out how we will protect land designated as BOL.
425	568	2-Peckham and Nunhead			No strong opinion on actual boundary	Noted.
426	569		Policy 8		Parking may be problematic with expansion and should be thought about carefully.	To inform our Preferred Option policies we have undertaken a car parking study

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						(2010) to examine the future demand for parking resulting from different levels of growth in Peckham and Nunhead. This study has concluded that some car parks need to remain and others are underused. Of the council owned car parks, our intention is to retain Choumert Grove car park as a car park, and develop Copeland Road car park (site PNAAP 7) and the Cerise Road multi-storey car park (site PNAAP 2). We have also identified the non-council owned Aylesham Centre, which includes the Morrisons car park (site PNAAP1), the Bellenden Road Retail Park, which includes the Lidl car park (site PNAAP 14) and the Asda site (site PNAAP 22) as proposals sites. This approach is illustrated in figure 10 and our policies for these sites are set out in section 6 and appendix B.
427	569		Policy 25		However I don't agree with proposals to have family housing in the core action area at all. These sites just won't be suitable for such a provision. Provision for family housing should only be provided outside in the wider action plan area where my response to questions 28 and 29 would be yes !	ur approach to family homes is consistent with the adopted Core Strategy. We recognise that the Core Area will be less able to provide family housing and this is reflected in the 20% target, rather than 30% which is applied in the South of the AAP area. However, the majority of new hosing will be provided in the core and so we think it is appropriate to require a mix of unit sizes to ensure we achieve a balance. We think that 20% is appropriate as it allows a range of other unit sizes.. We are also aware, as set out in the Strategic Housing Market Assessment and the Housing Requirements Study, that there is a particular need for family housing in the area.
428	569		Policy 32		It is critical that further key individual buildings and street scapes are protected before they are lost as proposed under 35 and 36 above.	AAP Policy 26: Heritage sets out how the character of Peckham and Nunhead will be strengthened by conserving and enhancing the significance of Peckham and Nunhead's heritage assets. This includes considering the impact of development on the area's heritage assets and their settings such as conservation areas, listed buildings, possible locally listed buildings, archaeology and registered historic parks. Policy 23 – 25 of the AAP states that we will work to ensure high quality design to protect and enhance the character of areas in Peckham and Nunhead. Development must consider their impact on neighbouring conservation areas to ensure they conserve and enhance these historic areas
429	569		Policy 17		The Faxyard site may need retaining for the tram ? Some sites will be more sensitive than others and so should be suitably hedged around with conditions where necessary.	Noted. We have taken forward a combination of option 1 and option 2 from the towards a preferred option. Our preference will be to develop the site as a tram terminus, but as an alternative we would consider a mixed-use development. This approach is set out in policy 12 of the AAP preferred option and site PNAAP 9 in appendix B.
430	569	Consulta tion			As ever with such proposals, it is always very difficult to more fully engage with the majority of those likely to be affected by the proposals who aren't used to either planning documents or processes. I welcome your attempts to do so whilst being somewhat uneasy about how many would consider they have really had their say or even recognised that they have had the opportunity. Even my response has been very last minute and I've known about the deadline for weeks !	Noted. Please refer to our consultation plan and consultation report which will be published at each stage of consultation.
431	569	Consulta tion			No further comments other than to say I think this has been a very good set of proposals.	Noted.
432	571		Policy 19	14	With reference to the possible redevelopment of the Choumert Grove car park: as the Vicar of All Saints church in Blenheim Grove (adjacent to the car park), I on behalf of our church council would like to flag up our use of the car park on Sunday mornings. We are a large church with an average congregation of 250 +. Many are young families who drive to church. Without the use of the car park they will be forced to park in neighbouring streets, causing problems both for them but also for local residents. We ourselves only have 6 parking places on our own ground. In addition to Sunday services, there are also occasional one-off events at other times attracting large numbers - last Saturday for example over 500 people were in church, again many of them coming by car. A number of our church community have written to me about their concerns. They may well have	Due to feedback from consultation on the towards a preferred option, our preferred option in the AAP is to maintain Choumert Grove car park and pursue the redevelopment of the Cerise road/cinema multi-storey and Copeland road car parks. This is set out in policy 14: parking for shoppers and visitors. This approach is supported by the Peckham town centre parking and delivery review study (2010), which highlighted that the number of car parking spaces in the town centre exceeds current and projected demand over the lifetime of the AAP. Releasing surplus sites for development will contribute to the regeneration of Peckham town centre. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years.

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					expressed those concerns themselves on this web-site, but it isn't totally clear how to do so. For example: I could not see the Choumert Grove car park mentioned on the previous page, and needed the help of Jeremy Giles on the phone to navigate my way through to here!	
433	467	3-Vision and objectives			"The rationale for the "possible green links" in Figure 7 need explanation R N-S one north of Peckham High Street obviously already exist along the Canal Path As for the other, it is hard to understand how Rye Lane or Peckham High Street can become that without considerable work – is this what is intended? Pleasant walking/cycling link(green?) is needed between Peckham Town Centre and Nunhead"	The vision diagrams have been amended and updated. They are illustrative and a tool to show how we want the area to look. In the active travel policy of the AAP we specifically refer to improving the links between Peckham Town Centre and Nunhead Local Centre. The importance of the the pedestrian and cycling links between these two located is also set out in the Peckham core action area and the Nunhead, Peckham Rye and Honor Oack character area policies on transport and movement.
434	467		Policy 7	5	The development of retail and office service on Commercial Way is a very good idea. The road itself need to become conducive to having a "place" function rather than solely a "Through" function as at present The Wooddene should not be redeveloped without dramatic changes to The A262 in front of itIt is too fast and wide at present	Support noted. We have identified in Section 5 of the Preferred Options the character areas including Peckham North. There are opportunities for development on Cator Street / Commercial Way. Redevelopment opportunities at three sites could include residential (C3) use as well as community/leisure/cultural (D1) uses. We estimate that there is capacity for approximately 270 residential units. There may also be an opportunity for some small scale shops along Commercial Way.
435	467		Policy 18		A clear commitment needs to be made to 20mph speed limits throughout the whole AAP area. This is a massive way to encourage walking & cycling .	Policy 5.5 in the Transport Plan states that we will make Southwark a 20mph borough. This could involve a range of measures being introduced to slow vehicle speeds. Transport Plan policy 5.6 suggests that busy streets can also have the effect of reducing vehicle speeds, so development proposed in the Peckham and Nunhead AAP could also have the effect of slowing vehicle speeds if it results in more people living, working and visiting the area.
436	467		Policy 15	5	The proposed new pedestrian routes east of Rye Lane are excellent Mention should be made of the A202 and the need to civilise /humanise this in the longer term in conjunction with TfL. Funding can be drawn from the development sites along this route The A202 and especially the area in front of the Wooddene estate must be considered and included in the AAP	We are committed to working with our partners and using development as an opportunity to create an environment that is more pedestrian-friendly throughout Peckham and Nunhead. We no longer intend to highlight individual routes in the AAP and instead set out our broad priorities in policy 11, in accordance with the council's Transport Plan. More local issues are detailed in Section 5, which focuses on the different character areas. The opportunities to improve the public realm and pedestrian links to the east of Rye Lane are referred to in Section 5 in policies relating to Peckham core action area.
437	467		Policy 29		New buildings should be built to zero carbon standards – or even carbon positive using renewable	Our environmental standards for new development are set out in policy 13 of the core strategy. This includes requiring Code for Sustainable Homes level 4 for residential development and BREEAM excellent for non-residential development. We have set out further detail in our sustainable design and construction SPD. We will also follow the London Plan target for all development to be carbon zero by 2016.
438	467	5.4-Potential housing sites			The key thing in developing all these sites as housing so close to the town centre is the fact that a town centre needs to exist to sustain these new residents. From this issue the following flows: The need for active frontages - new residential has to add to the life of the town at ground level A full range of amenities need to be created and within walking distance Access to green space is important... pleasant walking and cycling routes need to allow quick access to well maintained open/green spaces	The purpose of the AAP is to balance new growth with the facilities that are needed to support the community. The AAP sets key policies on things like design, including shopfronts, improving walking and cycling opportunities, open space etc. The AAP also has a specific policy on town centres which encourages a range of uses alongside residential.
439	467		Policy 30		This is very encouraging document with some excellent objectives A number of other idea/principles should be included: The greening of the area's streets and making them more "multi –purpose / multi function". There are many streets in the town centre that have little parking / little vehicular movement (eg Claude Road, Brayards Road, most of Consort Road). These are very sterile and dead places and need to be brought to life and serve other purposes – eg closed to traffic as "play streets" and become attractive links through to other places. Their role as improves of health, (through walking) and community	Support noted. This is covered in the AAP under Policy 19: Open spaces and Sites of importance for nature conservation (SINCs), Policy 22: Trees and Policy 23: Public Realm include requirements for new development to improve the overall greenness of the area, through planting street trees to green streets, reinforce planting where trees are integral to the historic townscape and support the development of green routes. Policy 24: Built form sets out how the incorporation of active uses at ground floor level where buildings front public

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					cohesion) having more local people present in them) should be made more of.	squares or spaces to encourage integration with the public realm and to help generate activity around them.
440	467		Policy 9		A network of Green Links (as being developed in the open spaces strategy) should be formally created/initiated for the AAP area.	We have set out further detail in the preferred option Peckham and Nunhead AAP on green links in the area. The council's draft open space strategy also sets out further information on delivering green links.
441	572		Policy 9		EQRA welcomes the proposed to designate Calyups Gardens as an open space	Support noted.
442	572		Policy 17	11	Although EQRA has indicated support for retaining the Flaxyard site as a possible terminus for Cross River Tram (CRT) or a quality alternative, we question whether this is the best site for the terminus. The Flaxyard site is a short distance away from, and separated by a busy main road from, the shops and businesses in the "heat" of Peckham (centred on Rye Lane). This would mean that CRT or an alternative would provide poor access to Peckham town centre. EQRA believe that, ideally, the tram or alternative should penetrate the town centre properly. We believe Southwark Council should consider designating the northern part of the Aylesham centre site to provide a terminus for the tram or alternative which would also link to the existing bus station. This would provide easier interchange with bus services from south and east of Peckham as well as better access to the redeveloped Aylesham Centre site. This would then enable the Flaxyard site to be released for other uses. (see attached plan).	The Flaxyard site (PNAAP 9) was identified as the preferred location for a tram terminus in Peckham as part of Transport for London's initial studies and reports concerning the possible route of the Cross River Tram. Locating a tram terminus here would ensure easy access to Peckham's main retail core around Rye Lane as well as existing and proposed leisure and cultural uses around Peckham Square. This approach also ensures greater flexibility for the redevelopment of the Aylesham Centre and the opportunity to provide a stronger retail presence along Rye Lane. Further detail is set out in appendix B under sites PNAAP 1 and PNAAP9.
443	572		Policy 19		EQRA believes that the Action Plan should specifically include provision for short-stay car parking and also for public cycle parking in Peckham Town Centre. EQRA also believes that there to be a policy to provide good quality infrastructure to enable bus services efficient, convenient access to the town centre. This would include ensuring that bus stops are attractive, convenient and in locations which are safe, it would also include adequately-enforced bus priority measures where appropriate. EQRA suggest also that the Action PP needs to include a policy which will facilitate deliveries to shop and business units without unduly inconveniencing other users of the town centre.	The Peckham town centre car parking and delivery review study highlighted that the supply of car parking exceeds both current and projected demand. The study also indicates that existing short-stay car parking is currently underused. Our preferred option is therefore to reduce the number of car parking spaces by developing surplus off-street car parks at Cerise road and Copeland road. This approach is set out in policy 14. We will continue to monitor the supply and demand for car parking as development takes place in the town centre over the next 15 years. The Southwark Plan contains minimum cycle parking standards that all new developments in the borough must meet and preferably exceed. This includes a requirement to provide an additional 10% for visitors that can also be used by the public. As development takes place in the town centre, we will therefore see an increase in the number of safe, secure cycle parking spaces. Policy 1.12 of the council's Transport Plan also states that we will increase provision of public cycle parking spaces in areas of high demand. Policy 12 in the AAP sets out that we will work with a number of organisations to improve the frequency, quality and reliability of public transport in Peckham and Nunhead. Policy 13 in the AAP sets out that our preferred approach with regard to servicing and deliveries. It states that developments will be required to demonstrate through a transport assessment that adequate measures are in place and that any negative impacts can be mitigated.
444	572		Polic 16		EQRA suggests that the Action Plan should specifically acknowledge that some parts of the Peckham and Nunhead area are distant from access to rails services, and we therefore more dependent on bus services compared to many other parts of Inner London	Section 2 of the AAP on Peckham and Nunhead today refers to this, as do the character area sections for all four of the character areas outside Peckham core action area.
445	572	6-Delivering working together to make it happen	Polic 16		EQRA believes there is scope to require new developments to contribute to improving the public transport system in Peckham and Nunhead (for example to improve infrastructure such as bus stop countdown displays or to contribute to start-up funding for new bus services) Alternatively, S106 funding could be secured to deliver environmental and urban realm improvements such as green spaces and /or permanent public art features (eg sculptures) which may contribute to Peckham developing a positive ideality	Policy 46 of the preferred option sets out our policy on section 106 and Community Infrastructure Levy. As set out in the policy we will be carrying out the first stage of consultation on our CIL later this year. We will provide more detail on our approach and how it links with the AAP at the next stage of consultation on the AAP.
446	572		Policy 7	19	Site 19 (Sumner Road Workshops): There are currently a lack of local shops in this part of North Peckham. EQRA suggests that retail unit(s) at ground floor level should be included	We have identified redevelopment opportunities on this site to include residential use (C3) as well as business use (B8) potentially (see PNAAP . Any development

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					in this development	on this site should improve the streetscape, particularly the frontage onto Sumner Road. There is also an opportunity to encourage some retail uses along Commercial Way. We have identified that there are currently very few shops in the area and residents have commented that they would like more local shops to serve the new homes.
447	573	2-Peckham and Nunhead			To have these two areas joined in this way does suggest that they will not be easy Bedfellows. By every measurement Peckham will be by far the dominant zone and will require to be thus treated. This is admitted throughout the document-e.g. Nunhead is a "quiet" area and relative to Peckham it receives less attention. It could be argued that in view of the major need to offer new lines of possible development to deal with the current chaotic conditions in parts of Peckham areas could be divided into two zones: 1 A Southern area (Nunhead) from Honor Oak Park to the line of the East Dulwich Road\Nunhead. 2 The remainder to the Burgess Park/Old Kent Road boundary. In all ways especially for residents there would be a greater feeling of belonging in that division than in the suggested one. Core Area The proposed boundary does appear more realistic .It is useful to include the area to Queen's Road Station in the core area and similarly North of Peckham Square. But in both cases as everywhere little will be achieved without some sort of new road traffic arrangement IN THE WHOLE AREA UP TO CAMBERWELL, GREEN.	We have introduced a new character area section which has specific policies and supporting text for each area. The character areas are based on new boundaries. This ensures that the AAP is more area focused and provides a more detailed approach to local issues. We will be preparing a Supplementary Planning Document for Camberwell in the future which will encompass Camberwell Green.
448	573	2-Peckham and Nunhead			In contrast to what you say it would appear that the much publicised Bellenden Area project has turned out as just another well-meaning clean up job. An original brasserie-type cafe is now a very much down-market pizza parlour: there are at least 5 empty shop spaces: a useful mini-market does get trade but is not special and a few professional firms will not attract new trading. True a bookshop has opened and good-luck to that as well as to a refurbished pub. But overall-why the shouting?	Noted.
449	573	2-Peckham and Nunhead	Policy 18		It is the opinion of very many that unless and until the chaotic road traffic arrangements are forced to improve little can be done to really improve the core area of Peckham. There is no need to go over the scenario save that it usually takes 15 minutes to travel from Rye Lane to Camberwell and 30 minutes often to Victoria. .It never will improve unless a really rich authority would sanction tunnel building to remove at least 60% of lorry traffic which passers through and has not a jot of interest in Peckham And that is a pipe dream. Get that done and the place would improve overnight.	We are committed to improving transport options throughout Peckham and Nunhead, reducing the volume of traffic and improving the functioning of the road network. We will work with TfL, transport operators and other partners to improve public transport and we will improve the broader environment to make walking and cycling and other forms of active travel more attractive and safer. These priorities are set out in the Transport Plan and in the Core Strategy. Key road network improvements are also important and our current priorities are set out for each of the individual character areas in Section 5. We will continue to monitor the operation of the road network and determine new priorities for improvement, in conjunction with the local community, over the lifetime of the PNAAP.
450	573	2-Peckham and Nunhead	Policy 32	6	The second essential which is always mentioned is to force Network Rail to further transform the station at Peckham Rye-and then open up that currently disgraceful area in front. The difference would happen overnight-a place to be proud of-not disgusted with Gangs and urban criminals are far less likely to destroy a restored areas like that than a so-called improvement to bus flow by spending millions in North Rye Lane in 2010/11	Noted. The site referred to are currently proposal sites: PNAAP 6: Peckham Rye Station PNAAP 3: Land between the railway arches (East of Rye Lane including railway arches). Appendix A of the AAP: Schedule of proposals sites outlines guidance for each site. Our intentions for PNAAP 3 are to open it up and create better links through the railways arches. Located within the Rye Lane Peckham conservation area, the AAP acknowledges that development on this site should seek to conserve and enhance the wider heritage setting. The consultation on the AAP has at every stage highlighted the support for improving the station and removing the existing forecourt buildings. This is one of the key aspirations of the AAP that will help to transform the area. We are working with the GLA and Network Rail to deliver our aspirations for the station. Southwark Council have publicly announced that it will be funding some of the improvements to the station and forecourt. In addition, in January 2012 the Council was successful in its bid for money as part of the GLA Regeneration Fund to assist those areas affected by the 2011 riots. Within the bid the key proposal is to create public square in front of the listed station building and improvements to the station building itself. We will provide more information on the implementation of this project at the next

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						stage of consultation.
451	573	2-Peckham and Nunhead			It is true that people travel distances to shop-Croydon was a surprise .But a good number-with babies, huge prams and baskets travel to and from Kennington Park en-route to Morrisons in Peckham and from Brixton perhaps. Another large unneeded traffic flow	The AAP encourages people to shop in the local area by encouraging walking, cycling and the use of public transport, particularly to access the shops and facilities in the town centre.
452	573	2-Peckham and Nunhead	Policy 17		It was very disappointing that the Cross-River Tram idea was thrown out .As said at the time a gyratory system to Brixton and the idea to reach Peckham would have been very useful. That said the new Clapham Junction connection will be useful and may help congestion a little.	Noted The overarching Core Strategy policy 2 refers more generally to safeguarding land for planned public transport improvements and where the need is likely to arise in the future. The proposals map safeguards a possible route for the tram, which would run from Peckham, towards the Aylesbury Estate and on to Waterloo. In the AAP preferred option, we have taken forward a combination of option 1 and option 2 from the towards a preferred option. Our preference will be to develop the site as a tram terminus, but as an alternative we would consider a mixed-use development. This approach is set out in policy 12 of the AAP preferred option and site PNAAP 9 in appendix B.
453	573		Policy 18		The Southern Rye Lane will not improve unless and until the traffic congestion on Northern Rye Lane is addressed.	Policy 13 sets out that we will continue to work with partners to improve travel choice and improve the functioning of the road network. This is consistent with the Core Strategy and Transport Plan, which stress the Council's commitment to promoting more sustainable transport, reducing reliance on private car-use and tackling congestion throughout the borough.
454	573	3-Vision and objectives			Also is it wise to emphasise creation of more cafes ,bars and restaurants in view of the "obesity" scare in the UK?	The policies in the AAP have been tested through our sustainability appraisal to ensure they have overall a positive impact on social, economic and environmental sustainability indicators. Health is included as one of these indicators. The AAP policy 2 sets out our approach to cafes and restaurants.
455	573	3.3.1-Peckham town centre	Policy 1	6	As already mentioned this will be the crux of the plans. The agreement to totally redevelop the "hub" of Peckham must be clear and most urgent. A demolition of the ludicrous tunnel outside Peckham Rye station-itself a likely crime collection point-is essential.	We have set out in our Preferred Options Policy 1 that we will promote the majority of additional retail floorspace on the larger town centre sites which include Aylesham Shopping Centre (PNAAP 1); Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6) and Land between the railway arches (PNAAP 3). This will help to strengthen the town centre We are working with Network Rail and the Greater London Authority to open up the space in front of Peckham Rye Station to create a new public square in the heart of Peckham.
456	573	3.3.1-Peckham town centre	Policy 2		There is also far too noise about the whole of Rye Lane as competition for road, pavement and markets occurs at almost all time. An evening economy could only take place in a quieter environment.	We have identified number of large development sites in the town centre and Peckham core action area provides the opportunity for a range of new public spaces of various sizes. We have identified sites in Appendix B of the Preferred Options which Redevelopment of the Aylesham Centre, cinema and multi-storey car park and Copeland Road Industrial Park will provide a range of new developments fronting and activating public spaces in the town centre. Their locations off Rye Lane will offer the opportunity to extend pedestrian movement east and west through the town centre,and leading to relieving congestion along Rye Lane. The Preferred Options The quality of the public realm
457	573	3.3.2-Queens Road	Policy 15		Queen's Road is a challenge but the road is mostly wider and a revitalised Station area would be a good start. Some useful linkage with Nunhead may be possible in that connection.	Policy 11 sets out our broad priorities for improving the pedestrian and cycle environment in Peckham and Nunhead. They include improving routes between Peckham town centre, Nunhead local centre and the stations. Section 5 of the AAP contains guidance specific to the individual character areas that have been identified in Peckham and Nunhead. As part of the guidance for the core action area, we acknowledge the opportunity to strengthen both the area around Queen's Road station and Queen's Road itself as a pedestrian route. The council are working with Network Rail and Southern Railways to improve the public realm around Queen's Road station and further detail is provided in PNAAP28 in Appendix B. The A202 will also be the route of one of the Mayor's cycle superhighways, which is scheduled for completion by 2015.

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458	573	3.3.3-Peckham neighbourhoods	Policy 13		It seems wrong to especially encourage the growth of .Lister Health Centre further than at present. An abiding memory anyone's stay in Peckham is the constant sound of sirens up and down the whole area-whether for true or False reasons-at every hour of day and even night. No health centre can deal with these by itself.	We have set out in the Preferred Options Policy 9 that we will continue to work with NHS Southwark to improve services in the area as opportunities arise.
459	573		Policy 18		On a similar matter must be addressed the damage to vehicles be the thousands of "traffic humps". These were introduced and local authorities were given a large cash incentive to place these at almost every 75 metres throughout the area. The depths of these vary but they are often of at least 9 inches high, and the irritation caused to drivers far outweighs the limited benefit. On many roads it is impossible to travel at over 15mph due to parking on both sides.	Noted, although this issue is too detailed for the AAP. Policy 5.5 of the council's Transport Plan states that we will make Southwark a 20mph borough. This was largely supported through consultation. Although this may involve the use of "traffic humps", the policy acknowledges that they are not always practical and a range of measures will be considered.
460	573		Policy 1		There are points on both options. The Aylesham centre is desperate for re-designing, as is Rye Lane. But WHY the narrowing of Rye Lane at huge cost, little apparent control over time-it took 6/7 months to complete a small job? Again nobody to blame. .It is sure to be dug up before long. Little wonder people despise councils. Big shops also need space. A link to e.g. Bellenden Road from Rye Lane would be imaginative	We have set out in our Preferred Options Policy 1 that we will promote the majority of additional retail floorspace on the larger town centre sites which include Aylesham Shopping Centre (PNAAP 1); Copeland Road Industrial Park (PNAAP 4); Peckham Rye Station (PNAAP 6) and Land between the railway arches (PNAAP 3). These identified development sites provide the opportunity for a range of new public spaces of various sizes which will aid in relieving congestion along Rye Lane and also provide the opportunity to improve linkages to the surrounding area. We have also identified in the Preferred Options Peckham South character area guidance that we will review the operation of the two one-way systems in the Bellenden area together with restrictions on access to Rye Lane.
461	573		Policy 5		New sites are vital-specialised trade-e.g. French cheeses and bread etc	We have set out in our Preferred Option Policy 5 general support for new markets and street trading areas in Peckham town centre to help add to and increase the variety of retail offer. We have not identified a preferred site for a new market, however have identified the land to the rear of Peckham Rye station could be a possible location for further consideration.
462	573		Policy 7		Commercial Way is a "rat run" with poor small shops and major traffic humps-not conducive or of great quality. Possible development near canal walk.	We have identified in the Preferred Options character area guidance for North Peckham an opportunity for the existing small parade of shops along Commercial Way to be extended through development at the Cator Street/Commercial Way opportunity sites to improve help meet residents day-to-day needs.
463	573		Policy 18		Much has been said already about the outstanding need for the authorities to get together with whatever funding can be found and make a totally new plan for the whole road transport from Camberwell to at least Queen's Road station. Rail has been mentioned. The constant bus connections, however, produce a chaotic and constant traffic blockage. It is clear that the vast majority of traffic on these roads have not the slightest chance of helping Peckham. They have no interest in the place-everyone wants them gone. Overseas visitors too are welcomed by a 15/20 hold up between Rye Lane and Camberwell. A great many are immigrants -?Polish. A dreadful introduction to their new workplace. And who cares? No one. "Not our responsibility" they cry!! When will a tunnel be constructed to remove these obstructions? "Too dear" Alas-no style	We are committed to improving transport options throughout Peckham and Nunhead, reducing the volume of traffic and improving the functioning of the road network. We will work with TfL, transport operators and other partners to improve public transport and we will improve the broader environment to make walking and cycling and other forms of active travel more attractive and safer. These priorities are set out in the Transport Plan and in the Core Strategy. We will continue to lobby for the Cross River Tram proposal to come to Peckham and also for the expansion of the Mayor's cycle hire scheme to broaden transport choice in the area. Key road network improvements are also important and our current priorities are set out for each of the individual character areas in Section 5. The projects referred to here have been developed as a result of transport modelling work that considered the potential traffic impacts of the development proposed through the AAP. We will continue to monitor the operation of the road network and determine new priorities for improvement, in conjunction with the local community, over the lifetime of the PNAAP.
464	573	Other			During a residence of nine years in Peckham it was possible to observe and assess the community. Despite the realities of deprivation, high serious crime, congestion and delays of all kinds the population offers great diversity and tenacity in very hard times. These times appear to be likely to continue for some years. The 15-year outline plan goes a long way to define the future needs. A new transport policy is essential to attract new investment does appear self-evident. Civic pride often only appears when a single event	Noted

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					occurs. The analogy is Glasgow in the late 1980s-a city for sure but far meaner and more desperate than ever Peckham is. The arrival of a new Lord Provost and a team with a slogan launched the city into a place where everyone decided to lend a hand and the results were self-evident and remain so. "Peckham works 'arder"	
465	575		Policy14		Peckham and Nunhead Area Action Plan - Homestall Road Fields I am writing with regard to the above Plan, of which I have only recently become aware. This plan contains proposals for the fields at Homestall Road that negatively impact upon the community living here and local, people are concerned I wish to object to these proposals for the following reasons: 1. They represent a wholly inappropriate intensification of use that the local community cannot sustain Existing levels of use already generate too much negative impact upon residents. Intensification will cause an unacceptable impact upon our health, amenity and environment. 2. The plan proposes the construction of an all-weather floodlit pitch. This introduces floodlit use 7 days a week from morning till night, with unacceptable impacts upon our amenity, environment, health and well-being. 3. The fields directly abut many properties in our community. The proposals constitute unacceptable light pollution and intrusion into many homes in our community. 4. Alternative locations for the floodlit pitch are not considered. The proposals are driven by Athenlay Football Club, which has not consulted with the local community who live in the area. The Council needs to look at alternative locations rather than imposing an unwanted floodlit pitch upon our local community. 5. Much of nearby Peckham Rye Park has already been lost to newly installed soccer pitches, with unacceptable impacts upon people living in Colyton Road. Now the Council is proposing to make this worse by having yet more soccer to their rear at Homestall fields, effectively surrounding them. Are they to have no respite? 6. The proposals are not inclusive and offer little to those people who live locally. The council should explore other uses, instead of putting all weather football pitches on it. 7. Once built, there will follow inevitable plans by Athenlay football club to expand Homestall Road into ever bigger facilities so it can generate revenue from its floodlit pitches, with no regard to the concerns of people who actually live here. I would like to see the Council explore retaining the current grass pitches at their existing levels of use, with the rest of the fields used for the benefit of the whole community. Examples could include allotments (there is a shortage of these) and/ or a nature garden. This could encourage local people to grow their own food and help educate young people about healthy foods. I look forward to your response and confirmation that my views and the views of people who live locally to Homestall Road fields will be included in progressing the Area Action Plan.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
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469	578		Policy14		It is inappropriate to upgrade a small secondary playing field, immediately surrounded by long standing residential development. Athenlay are over ambitious. The field is entirely unsuitable for such intensives use. Tim Clee's letter (nov 2011) suggests your "proposal" are fait accomli with no regards to views of local residents	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
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471	580		Policy14		Peckham and Nunhead Area Action Plan - Homestall Road Fields I am writing with regard to the above Plan, of which I have only recently become aware. This plan contains proposals for the fields at Homestall Road that negatively impact upon the community living here and local, people are concerned I wish to object to these proposals for the following reasons: 1. They represent a wholly inappropriate intensification of use that the local community cannot sustain Existing levels of use already generate too much negative impact upon residents. Intensification will cause an unacceptable impact upon our health, amenity and environment. 2. The plan proposes the construction of an all-weather floodlit pitch. This introduces floodlit use 7 days a week from morning till night, with unacceptable impacts upon our amenity, environment, health and well-being. 3. The fields directly around many properties in our community. The proposals constitute unacceptable light pollution and intrusion into many homes in our community. 4. Alternative locations for the floodlit pitch are not considered. The proposals are driven by Athenley Football Club, which has not consulted with the local community who live in the area. The Council needs to look at alternative locations rather than imposing an unwanted floodlit pitch upon our local community. 5. Much of nearby Peckham Rye Park has already been lost to newly installed soccer pitches, with unacceptable impacts upon people living in Colyton Road. Now the Council is proposing to make this worse by having yet more soccer to their rear at Homestall fields, effectively surrounding them. Are they to have no respite? 6. The proposals are not inclusive and offer little to those people who live locally. The council should explore other uses, instead of putting all weather football pitches on it. 7. Once built, there will follow inevitable plans by Athenley football club to expand Homestall Road into ever bigger facilities so it can generate revenue from its floodlit pitches, with no regard to the concerns of people who actually live here. I would like to see the Council explore retaining the current grass pitches at their existing levels of use, with the rest of the fields used for the benefit of the whole community. Examples could include allotments (there is shortage of this) and/ or a nature garden. This could encourage local people to grow their own food and help educate young people about healthy foods. I look forward to your response and confirmation that my views and the views of people who live locally to Homestall Road fields will be included in progressing the Area Action Plan.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
472	580		Policy14		1) No peace and quiet at all for retired people relaxing in their gardens during the summer months 2) Flood lights preventing people's sleep at night 3) Southwark Council should use the money for far better use in the borough	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
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474	581		Policy14		We have problems with parking herd which will only get worse with late evening ? ? Football - and noise and nusiance. Field could be used as a children's garden or wild life area. There is plenty of room next to the Harris sjports centre for more astroturf.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
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476	583		Policy14		Peckham and Nunhead Area Action Plan - Homestall Road Fields I am writing with regard to the above Plan, of which I have only recently become aware. This plan contains proposals for the fields at Homestall Road that negatively impact upon the community living here and local, people are concern I wish to object to these proposals for the following reasons: 1. They represent a wholly inappropriate intensification of use that the local community cannot sustain Existing levels of use already generate too much negative impact up residents. Intensification will cause an unacceptable impact upon our health, amenity and environment. 2. The plan proposes the construction of an all-weather floodlit pitch. This introduces floodlit use 7 days a week from morning till night, with unacceptable impacts upon our amenity, environment. health and well-being. 3. The fields directly abound many properties in our community. The proposals constitute unacceptable light pollution and intrusion into many homes in our community. 4. Alternative locations for the floodlit pitch are not considered. The proposals are driven by Athenlay Football Club, which has not consulted with the local community who live in the area. The Council needs to look at alternative locations rather than imposing an unwanted floodlit pitch upon our local community. 5. Much of nearby Peckham Rye Park has already been lost to newly installed soccer pitches, with unacceptable impacts upon people living in Colyton Road. Now the Council is proposing to make this worse by having yet more soccer to their rear at Homestall fields, effectively surrounding them. Are they to have no respite? 6. The proposals are not inclusive and offer little to those people who live locally. The council should explore other uses, instead of putting all weather football pitches on it. 7. Once built, there will follow inevitable plans by Athenlay football club to expand Homestall Road into ever bigger facilities so it can generate revenue from its floodlit pitches, with no regard to the concerns of people who actually live here. I would like to see the Council explore retaining the current grass pitches at their existing levels of use, with the rest of the fields used for the benefit the whole community. Examples could include allotments (there is shortage of this) and/ or a nature garden. This could encourage local people to grow their own food and help educate young people about healthy foods. I look forward to your response and confirmation that my views and the views of people who live locally to Homestall Road fields will be included in progressing the Area Action Plan.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
477	583		Policy14		Please bear in mind that this field is bordered on three sides by houses. Any further activity will have a negative effect on our quality of life.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
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479	584		Policy14		<p>Please consider allotments on the site</p>	<p>The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.</p>
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481	585		Policy14		Whilst we support the need for activities for young people the use of the is field really needs careful consideration and respect for residents concerns as it is a quiet residential area chosen by many of us to live in for this reason and housing adjoins the boundaries directly on three sides. We are already negatively impacted by current noise levels and very distressed at suggestions that they may be increased as much as are being proposed. We respectfully ask that our voices are heard by the council and Athenlay FC	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
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485	589		Policy14		Peckham and Nunhead Area Action Plan - Homestall Road Fields I am writing with regard to the above Plan, of which I have only recently become aware. This plan contains proposals for the fields at Homestall Road that negatively impact upon the community living here and local, people are concerned I wish to object to these proposals for the following reasons: 1. They represent a wholly inappropriate intensification of use that the local community cannot sustain Existing levels of use already generate too much negative impact upon residents. Intensification will cause an unacceptable impact upon our health, amenity and environment. 2. The plan proposes the construction of an all-weather floodlit pitch. This introduces floodlit use 7 days a week from morning till night, with unacceptable impacts upon our amenity, environment, health and well-being. 3. The fields directly abut many properties in our community. The proposals constitute unacceptable light pollution and intrusion into many homes in our community. 4. Alternative locations for the floodlit pitch are not considered. The proposals are driven by Athenlay Football Club, which has not consulted with the local community who live in the area. The Council needs to look at alternative locations rather than imposing an unwanted floodlit pitch upon our local community. 5. Much of nearby Peckham Rye Park has already been lost to newly installed soccer pitches, with unacceptable impacts upon people living in Colyton Road. Now the Council is proposing to make this worse by having yet more soccer to their rear at Homestall fields, effectively surrounding them. Are they to have no respite? 6. The proposals are not inclusive and offer little to those people who live locally. The council should explore other uses, instead of putting all weather football pitches on it. 7. Once built, there will follow inevitable plans by Athenlay football club to expand Homestall Road into ever bigger facilities so it can generate revenue from its floodlit pitches, with no regard to the concerns of people who actually live here. I would like to see the Council explore retaining the current grass pitches at their existing levels of use, with the rest of the fields used for the benefit of the whole community. Examples could include allotments (there is shortage of this) and/ or a nature garden. This could encourage local people to grow their own food and help educate young people about healthy foods. I look forward to your response and confirmation that my views and the views of people who live locally to Homestall Road fields will be included in progressing the Area Action Plan.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
486	590		Policy14		Peckham and Nunhead Area Action Plan - Homestall Road Fields I am writing with regard to the above Plan, of which I have only recently become aware. This plan contains proposals for the fields at Homestall Road that negatively impact upon the community living here and local, people are concerned I wish to object to these proposals for the following reasons: 1. They represent a wholly inappropriate intensification of use that the local community cannot sustain Existing levels of use already generate too much negative impact upon residents. Intensification will cause an unacceptable impact upon our health, amenity and environment. 2. The plan proposes the construction of an all-weather floodlit pitch. This introduces floodlit use 7 days a week from morning till night, with unacceptable impacts upon our amenity, environment, health and well-being. 3. The fields directly abut many properties in our community. The proposals constitute unacceptable light pollution and intrusion into many homes in our community. 4. Alternative locations for the floodlit pitch are not considered. The proposals are driven by Athenlay Football Club, which has not consulted with the local community who live in the area. The Council needs to look at alternative locations rather than imposing an unwanted floodlit pitch upon our local community. 5. Much of nearby Peckham Rye Park has already been lost to newly installed soccer pitches, with unacceptable impacts upon people living in Colyton Road. Now the Council is proposing to make this worse by having yet more soccer to their rear at Homestall fields, effectively surrounding them. Are they to have no respite? 6. The	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.

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					proposals are not inclusive and offer little to those people who live locally. The council should explore other uses, instead of putting all weather football pitches on it. 7. Once built, there will follow inevitable plans by Athenlay football club to expand Homestall Road into ever bigger facilities so it can generate revenue from its floodlit pitches, with no regard to the concerns of people who actually live here. I would like to see the Council explore retaining the current grass pitches at their existing levels of use, with the rest of the fields used for the benefit the whole community. Examples could include allotments (there is shortage of this) and/ or a nature garden. This could encourage local people to grow their own food and help educate young people about healthy foods. I look forward to your response and confirmation that my views and the views of people who live locally to Homestall Road fields will be included in progressing the Area Action Plan.	
487	590		Policy14		I would embrace an allotment a 100% if the plan should go ahead. It would turn the whole area in to a SLUM. It would harbour all sorts of undersirables which would change the face and reputation of the community.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
488	591		Polic 16		Transport links to Duwich, as well as links to the north of the borough should be addressed	Policy 11 sets out our approach to active travel. We have removed the figure referring to specific routes. Our approach, in accordance with our Transport Plan is to prioritise links to key destinations. This includes schools and train stations.
489	591		Policy 30		The PNAAP should address the design of the future developments to ensure that they are of high quality	Core Strategy strategic policy 12 says that development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in. We also have the following policies in the Saved Southwark Plan: Policy 3.12 – Quality in Design Policy 3.13 – Urban Design Policy 3.14 – Designing Out Crime Policy 3.15 – Conservation of the Historic Environment Policy 3.16 - Conservation Areas Policy 3.17 - Listed Buildings Policy 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites Policy 3. 20 – Tall Buildings Policy 3.22 - Important Local Views Our Residential design standards SPD provides further detailed guidance on how new housing development should meet the design standards set out in the Core Strategy. Policy 23: Public Realm and Policy 24: Built Form set out how we ensure the high quality design of buildings and spaces will be required to meet the highest possible design standards, in line with our Core Strategy. We have also included specific site guidance for our proposals sites in Section 6 of the AAP: Sites in Peckham and Nunhead and Appendix A: Schedule of proposals sites. Section 5 of the Preferred option AAP includes five new character area visions setting out the character, opportunities and policies for each. These policies show how we will ensure that new development in Peckham and Nunhead is of the highest design whilst being appropriate to context and character.
490	591		Policy 15		The PNAAP should ensure the opportunities to improve Rye Lane as a key shopping link between Peckham and Nunhead are not missed	The potential to improve Rye Lane as a key shopping link is an integral part of our vision and is highlighted in the challenges and opportunities section at the start of the AAP. Policy 1 Peckham town centre specifically refers to strengthening the retail offer along Rye Lane, and the character area policies for Peckham core action area in section 5 of the AAP provide more detail. This includes bidding for funding from the Townscape Heritage Initiative Fund to improve the shop fronts along Rye Lane.
491	591		Policy 11		The PNAAP should ensure that the need for new primary school places is addressed adequately	We have developed a robust methodology for planning for school places. Our strategy set out in the Preferred Options Policy 8 is to provide additional places at

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						existing primary schools in the area to meet future growth
492	591		Polic 16		Questions should be asked as to whether the PNAAP should continue to safeguard land for the Cross River Tram	Core Strategy policy 2 protects the route of the possible Cross River Tram. Policy 12 of the preferred option sets out that our key priority is the Cross River Tram or an alternative high quality public transport service to link Peckham to north London. We have set out that we will safeguard the land at the south of Sumner Road (Flaxyards site). However, we also set out that if this land is not required for a terminus the site will be developed for mixed use development. We may set out more detail on funding if it is available at the next stage of consultation.
493	591	Other			The preferred option document is welcomed so that the area can get much needed care and attention and as it out for public consultation until 30th September, member of the public should be encouraged to make comments during this period	Noted.
494	592		Policy14		I am writing with regard to the above Plan, of which I have only recently become aware. This plan contains proposals for the fields at Homestall Road that negatively impact upon the community living here and local, people are concern I wish to object to these proposals for the following reasons: 1. They represent a wholly inappropriate intensification of use that the local community cannot sustain Existing levels of use already generate too much negative impact up residents. Intensification will cause an unacceptable impact upon our health, amenity and environment. 2. The plan proposes the construction of an all-weather floodlit pitch. This introduces floodlit use 7 days a week from morning till night, with unacceptable impacts upon our amenity, environment. health and well-being. 3. The fields directly abound many properties in our community. The proposals constitute unacceptable light pollution and intrusion into many homes in our community. 4. Alternative locations for the floodlit pitch are not considered. The proposals are driven by Athenlay Football Club, which has not consulted with the local community who live in the area. The Council needs to look at alternative locations rather than imposing an unwanted floodlit pitch upon our local community. 5. Much of nearby Peckham Rye Park has already been lost to newly installed soccer pitches, with unacceptable impacts upon people living in Colyton Road. Now the Council is proposing to make this worse by having yet more soccer to their rear at Homestall fields, effectively surrounding them. Are they to have no respite? 6. The proposals are not inclusive and offer little to those people who live locally. The council should explore other uses, instead of putting all weather football pitches on it. 7. Once built, there will follow inevitable plans by Athenlay football club to expand Homestall Road into ever bigger facilities so it can generate revenue from its floodlit pitches, with no regard to the concerns of people who actually live here. I would like to see the Council explore retaining the current grass pitches at their existing levels of use, with the rest of the fields used for the benefit the whole community. Examples could include allotments (there is shortage of this) and/ or a nature garden. This could encourage local people to grow their own food and help educate young people about healthy foods. I look forward to your response and confirmation that my views and the views of people who live locally to Homestall Road fields will be included in progressing the Area Action Plan.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
495	592		Policy14		We are in agreement with your view regarding the proposals for the field [that the proposed investment will have a negative impact on local residents], we feel strongly about such plans and support you in whatever action you take	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
496	593		Policy14		1) Athenlay football club provides training guidance for in the region of 200 players every week 2) There is a great community spirit at the club as it offers opportunity to all with no exclusions 3) The club has been there since the 70's and has nurtured 1000's of children	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports

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					and youth's during that time. 4) The two Harris academy schools close by will, as I understand it, be able to utilise the facilities	facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
497	594		Policy14		My son plays and trains with the Athenlay FC U13s. The club and the facility is hugely important and I fully support the plans for redevelopment.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
498	595		Policy14		I don't often write emails in support of causes but feel moved to on this occasion. Athenlay Football Club is an excellent local club that is doing truly wonderful work in our community. I am a television producer and I have spent years working for the Premier League. I have attended many community events run by premier league clubs and have seen the value of the work they have provided. Athenlay compares favourably with that standard. My children have been trained at the ground for a number of years and at all times I have found the coaches and volunteers, courteous, knowledgeable and with the best interests of the children at heart. I know of nowhere else in our community that provides a focus for so many people from widely different backgrounds. Athenlay brings people together and teaches people to plays football in the right spirit. It is a successful club in terms of winning trophies and it is an exceptionally successful club in terms of setting an example to the rest in how the game should be played. The ground's facilities are woefully lacking. The volunteers do their best with what is available, but a redevelopment of the area is well overdue. It would be money and resources put to a very good use and I urge you to back the development. One final thing; as ever with a development like this, itis only to be expected that local residents express anxiety at change. I would say, however, that I have seen the club always try to address any concerns brought up to them in the past by the neighbours as positively as they can.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
499	596		Policy14		I am a parent of two children currently in Athenlay football teams, who train at Homestall Road Playing Fields. I wanted to write in support of the plans to develop the fields and urge you to help us in our plight. The fields have become a real home to our boys (and the odd girls too -whether players or siblings). We have such a wonderful sense of community between the parents, players and coaches and the grounds give us such a sense of home for our children and families. They have a real feel of the local areas available to us back when we were children and I can't understand how they would have anything other than a positive impact on local communities. It certainly has a very positive impact on the lives of the footballers that are trained there. I hope you can support us further in our campaign to have the proposed works completed in the near future.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
500	597		Policy14		I am in support of the development proposed by Athenlay	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.

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501	598		Policy14		As a local parent of a 13 year old boy who has played at Athenlay for the last 6 years, I would like to say that I fully support the new development of the playing fields in Homestall Road. It is of vital importance to the whole community that there is a more positive and healthy alternative for young people than hanging around bored, or playing computer games (we all know that can lead to trouble). Football brings different members of the community together and bonds the teams in a friendly, positive and healthy environment. This club has been running for a long time with lots of people giving a great deal of time and effort to these children. Please don't let a few disgruntled residents stop this opportunity for Southwarks young people.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
502	599		Policy14		We are writing to to you as a local resident of Athenay Football club to state my support for the development of the Homestall playing fields. We are in dire need of structured playing environments for such a strong family residential area. WE sincerely hope that you will go ahead and support their plans	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
503	600		Policy14		I would just like to add my support for the development of Homstall Road home of Athenlay Football club. I am a parent of three boys who love to play football, my first son arrived to play football at Athenlay aged 6yrs and 5 mths back in 2008/9 season , due to the warm welcome and the engaging manner of parents I decided to assist the club in coaching the under 7s and I'm still coaching both Tuesday and Saturday and attending the matches on Sunday . We have an identity at this ground and it's both useful for the local community and young kids with ambitions to make a success of their lives as professional footballers, they have good role models and we have history in producing professional footballers eg Anton Ferdinand and Ben Watson who have gone on to represent their countries at u21 level. We are aware of the concerns of the local residents but can reassure them that we will assist in making the changes to the ground and surrounding areas as minimal as possible.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
504	601		Policy14		This is an email to express my support for the redevelopment plans of the Homestall Road Playing Fields. My son, Oliver, who is 6, started training with Athenlay FC towards the end of last year. He thoroughly enjoys playing with the U6 boys and gets a lot from training with his group of friends on a Saturday morning - he can't wait until next year when they are allowed to play other teams competitively. I met the chairman of the club for the first time last week and I think it is fantastic what the group of volunteers do to keep the club going and the kids happy - and to raise funding to develop the grounds as a community asset for children and young people of all walks of life is a great achievement, and one that appears to have taken a lot of time and effort. Athenlay FC thrives on the commitment of an impressive number of volunteers who give up their time to manage a self-sustaining leisure facility and encourage children and young people to lead a healthy lifestyle and realise their potential. As a local resident and user of the facilities I hope that the redevelopment plans get the support they deserve	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
505	602		Policy14		This is a letter to express my support for the redevelopment plans of the Homestall Road Playing Fields. I'm proud that the club has been able to access corporate funding to develop the grounds as a community asset for children and young people of all walks of life. Athenlay FC thrives on the commitment of an impressive number of volunteers who give up their time to manage a self-sustaining leisure facility and encourage children and young people to lead a healthy lifestyle and realise their potential. For young people the club provides an invaluable focus, teaching them the benefits of commitment, team work, loyalty and positive community relationships. Regular contact with adults, positive role models and consistency provide an answer to many of the issues that came to light	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.

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					following the August 2011 riots. 21st century children need 21st century investments to maintain a sense of pride in the area now and for the future.	
506	603		Policy14		This is a letter to express our support for the redevelopment plans of the Homestall Road Playing Fields. I'm proud that the club has been able to access corporate funding to develop the grounds as a community asset for children and young people of all walks of life. Athenlay FC thrives on the commitment of an impressive number of volunteers who give up their time to manage a self-sustaining leisure facility and encourage children and young people to lead a healthy lifestyle and realise their potential. For young people the club provides an invaluable focus, teaching them the benefits of commitment, team work, loyalty and positive community relationships. Regular contact with adults, positive role models and consistency provide an answer to many of the issues that came to light following the August 2011 riots. 21st century children need 21st century investments to maintain a sense of pride in the area now and for the future.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
507	604		Policy14		I am writing to express my support for the redevelopment plans for Athenlay Football Club on Homestall Road Playing Fields. The club is, and has been for over 30 years, a fantastic benefit for the local children. I have 3 boys who currently play for Athenlay and have seen first hand what a great opportunity it provides for young children and adolescents. There is so much benefit for children to belong to such a club, participating in a team sport, learning about commitment and loyalty and being taught by dedicated volunteer adult coaches. The club is also has a strong community focus for the parents and friends of Athenlay. We should be very proud to belong to such a great club. Recently the club has secured funding to redevelop the area; to relay the grass pitches, develop an all weather pitch and build a new club house and toilet/changing facilities. This is work that will only improve the club and it's function and appearance. The result of the redevelopment work will improve the club for the community, it is a very positive step forward in updating facilities and giving the boys and girls, and all in those involved in Athenlay FC a club really to be proud of.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
508	605		Policy14		I want to express my support for the Proposed Athenlay Ground Developments. I have a long association with the Club. My eldest son played for the club for 5 years and now has gone off to University, my youngest is now part of the club and enjoying all the Benefits of being part of a team. For young people the club provides an invaluable focus, teaching them the benefits of commitment, team work, loyalty and positive community relationships. It is fantastic how a community builds around a club any any improvement to the facilities will extend the legacy for youngsters and their families well into the future	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
509	606		Policy14		I would like to express my support for the redevelopment plans of the Homestall Road Playing Fields, and my concerns that there have been some residents opposed to the development plans of Athenlay FC. I believe that the success of the club in accessing both corporate and private funding to develop the grounds as a community asset, for children and youth, shows the public and indeed corporate awareness for the need for such facilities. Athenlay FC thrives on the commitment of an impressive number of volunteers who give up their time to manage a self-sustaining leisure facility and encourage children and young people to lead a healthy lifestyle and realize their potential. For young people the club provides an invaluable focus, teaching them the benefits of commitment, team work, loyalty and positive community relationships. Regular contact with adults, positive role models and consistency provide an answer to many of the issues that came to light following the August 2011 riots. 21st century children need 21st century investments to maintain a sense of pride in the area now and for the future. Every time one of my three sons, or niece, pull on their yellow and blue shirts they have a true sense of pride and community spirit. This sense of belonging and success is spread to all the other London boroughs when Athenlay FC play away matches. I would like to call upon the support of my local councilors to represent myself and the MAJORITY of local residents, and expel	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.

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Representation Ref	Object or Ref	Section	Main Policy	Development sites	Details of Representation	Officer Response to Representation
					the idea that a community run, well maintained, open air leisure facility can possibly have a negative effect on our neighborhood.	
510	607		Policy14		This is a letter to express our support for the redevelopment plans of the Homestall Road Playing Fields. We're proud that the club has been able to access corporate funding to develop the grounds as a community asset for children and young people of all walks of life. Athenlay FC thrives on the commitment of an impressive number of volunteers who give up their time to manage a self-sustaining leisure facility and encourage children and young people to lead a healthy lifestyle and realise their potential. For young people the club provides an invaluable focus, teaching them the benefits of commitment, team work, loyalty and positive community relationships. Regular contact with adults, positive role models and consistency provide an answer to many of the issues that came to light following the August 2011 riots. 21st century children need 21st century investments to maintain a sense of pride in the area now and for the future.	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
511	608		Policy14		I am strongly supporting the plans for re-developing the Homestall Road Play Ground which will give our children a promising start in years to come. Thank you parents from Homestall Road Play Ground	The AAP sets out the strategic vision for Peckham and Nunhead. The vision for Nunhead sets out where there will be improvements to open spaces including at Homestall Road playing ground. Policy 10 also mentions that the play and sports facilities will be improved at Homestall Road. The AAP does not provide detail on the improvements that will take place. The council have committed to upgrading the existing sports facilities on Homestall Road playing ground but at this stage no further decision has been made. Section 7 sets out how we will deliver our policies, and we set out that we will set out more information at the next stage of consultation through an infrastructure plan.
513	209		Policy 9		The 2010 Living Streets Report on Peckham also points out that although there are many pleasant and attractive streets in Peckham, it is noticeable that a number of streets that are close to the town centre are barren and devoid of character. It suggests that these are prime candidates for a major rethink with the options of turning them into pocket parks, allotments, Green Links or low cost versions of HomeZones via the DIY Streets scheme from Sustrans). Given the intention of creating more housing in the centre, it is important that there is sufficient green infrastructure. Living Streets report	Core strategy policy 11 sets out our approach to improving, protecting and maintaining a network of open spaces. This includes promoting and improving access to and links between open spaces. We have set out further detail in the preferred option Peckham and Nunhead AAP on green links in the area. The council's draft open space strategy also sets out further information on delivering green links.